



Cabinet

Members are invited to a **Meeting of the Cabinet** to be held in the Conference Room, Riverside, Lowestoft, on **Tuesday, 2 January 2024 at 6.30pm.**

This meeting will be broadcast to the public via the East Suffolk YouTube Channel at <https://youtube.com/live/ehjlfQDE9u8?feature=share>.

Members:

Councillor Caroline Topping (Leader of the Council), Councillor David Beavan (Deputy Leader and Housing), Councillor Paul Ashton (Corporate Services – Digital, Customer Services, HR and Assets), Councillor Jan Candy (Community Health), Councillor Tom Daly (Energy and Climate Change), Councillor Toby Hammond (Economic Development and Transport), Councillor Vince Langdon-Morris (Resources and Value for Money), Councillor Rachel Smith-Lyte (The Environment), Councillor Sarah Whitelock (Communities, Leisure and Tourism), Councillor Kay Yule (Planning and Coastal Management)

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 Announcements

To receive any announcements.

4 Minutes

To confirm as a correct record the minutes of the meeting held on 5 December 2023.

1 - 10

KEY DECISIONS

Part One – Open to the Public		Pages
5	Fees and Charges for the Financial Year 2024/25 ES/1789 Report of the Cabinet Member with responsibility for Resources and Value for Money.	11 - 96
6	Southwold Harbour Management Committee – Fees and Charges 2024/25 ES/1790 Report of the Cabinet Member with responsibility for Resources and Value for Money.	97 - 108
NON-KEY DECISIONS		
7	General Fund Budget 2024/25 and Medium Term Financial Strategy (MTFS) ES/1791 Report of the Cabinet Member with responsibility for Resources and Value for Money.	109 - 171
8	Capital Programme 2023/24 to 2027/28 ES/1792 Report of the Cabinet Member with responsibility for Resources and Value for Money.	172 - 191
9	Housing Revenue Account (HRA) Budget Report 2024/25 to 2027/28 ES/1793 Report of the Cabinet Member with responsibility for Resources and Value for Money and the Deputy Leader and Cabinet Member with responsibility for Housing.	192 - 220
10	People Strategy 2024–28 ES/1794 Report of the Cabinet Member with responsibility for Corporate Services - Digital, Customer Services, HR and Assets.	221 - 241
11	Sea Link Nationally Strategic Infrastructure Project – Statutory Consultation Response ES/1795 Report of the Cabinet Member with responsibility for Energy and Climate Change.	242 - 301
12	Housing Regulation – Quarterly Update ES/1796 Report of the Deputy Leader and Cabinet Member with responsibility for Housing.	302 - 320
13	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 items of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraphs 3 and 4 of Part 1 of Schedule 12A of the Act.	
Part Two – Exempt/Confidential		Pages
14	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). 	

KEY DECISIONS

15 East Point Pavilion (revised model of operation)

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

16 Provision of Procurement Services to Great Yarmouth Borough Council

- Information relating to the financial or business affairs of any particular person (including the authority holding that information).
- Information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or office holders under, the authority.

Close



Chris Bally, Chief Executive

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democraticservices@eastsoffolk.gov.uk

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Unconfirmed



Minutes of a Meeting of the **Cabinet** held in the Deben Conference Room, East Suffolk House, Melton, on **Tuesday, 5 December 2023 at 6.30pm.**

Members of the Cabinet present:

Councillor Paul Ashton, Councillor David Beavan, Councillor Jan Candy, Councillor Tom Daly, Councillor Toby Hammond, Councillor Vince Langdon-Morris, Councillor Rachel Smith-Lyte, Councillor Caroline Topping, Councillor Sarah Whitelock, Councillor Kay Yule

Other Members present:

Councillor Peter Byatt, Councillor Julia Ewart, Councillor Alan Green, Councillor Mark Jepson, Councillor Graham Parker

Officers present:

Chris Bally (Chief Executive), Chris Bing (Head of Legal and Democratic Services), Kate Blakemore (Strategic Director), Lorraine Fitch (Democratic Services Manager), Ben Hunter (Senior Environmental Protection Officer), Andrew Jarvis (Strategic Director), Nick Khan (Strategic Director), Paul Mackie (Lead Officer - Environment and Climate Change), Matt Makin (Democratic Services Officer (Regulatory)), Fiona Quinn (Head of Environmental Services and Port Health), Nicole Rickard (Head of Communities), Lorraine Rogers (Chief Finance Officer)

1 Apologies for Absence

There were no apologies for absence from Cabinet Members.

It was noted that Councillor Rivett was unwell and Councillor Jepson attended the meeting from the Conservative Group.

2 Declarations of Interest

There were no Declarations of Interest.

3 Announcements

Leader of the Council

There were no announcements from the Leader of the Council.

Cabinet Members

There were no announcements from Cabinet Members.

Chief Executive

There were no announcements from the Chief Executive

4 Minutes

On the proposition of Councillor Hammond, seconded by Councillor Candy it was

RESOLVED

That the minutes of the meeting held on 7 November 2023 be agreed as a correct record and signed by the Chair

5 Council Tax Base 2024/25

Councillor Langdon-Morris the Cabinet Member with responsibility for Resources and Value for Money introduced report ES/1752 which related to the Council tax base for 2024 / 2025.

As outlined in the report the council tax base was the total taxable value at a point in time of all the domestic properties in the council's area. It was annual calculation and represented the estimated number of chargeable dwellings after allowing for exemptions and discounts, reliefs, projected changes in the property base and after applying an estimated collection rate.

Councillor Langdon-Morris highlighted that growth in properties appears to be slowing and was less than estimated in the previous year.

At the current stage there were no significant movements from the current position was assumed in calculating the 2024 / 2025 tax base. Monitoring of the current base indicated that the current 99% collection rate used in the calculation could be maintained.

Appendix A of the report showed the estimated 2024/25 council tax base for the district of 91,018.73 Band D equivalents by parish. Overall, the tax base for the district showed an increase of 677.81, or around 0.75%, on the tax base for the current year of 90,340.92 Band D equivalents.

There were no questions from Cabinet or other members in attendance and on the proposition of Councillor Langdon-Morris seconded by Councillor Daly it was

RESOLVED

That Cabinet approve:

1. That the council tax base for 2024/25 for the East Suffolk district is 91,018.73 Band D equivalent properties.

2. That the council tax bases for 2024/25 for individual town and parish areas are as shown in Appendix A.

6 Parking Collection and National Pay Platform

Councillor Hammond the Cabinet Member with responsibility for Economic Development and Transport introduced report ES/1753 which related to the Parking Collection and National Parking Platform.

It was noted the report title referred to the Parking Platform as Pay Platform in error. The title of the report should have read: Parking Collection and National Parking Platform.

The National Parking Platform was government scheme making all the apps interoperable and that any app would work on different systems.

The report sought approval from Cabinet on changes to the terms and conditions of the RingGo contract in readiness for the National Parking Platform.

Councillor Hammond highlighted that in 2022/23 the 20p convenience fee charged by RingGo for each parking event cost the Council some £177,700. The estimated convenience fee cost for 2023/24 is £208,659.97. To date the convenience fee was absorbed by the Council. Under the new terms and conditions the fee would have to be passed on to the customer that would result in an estimated saving of over half a million pounds over three years.

Councillor Whitelock raised a query regarding whether any changes would be communicated to the public.

Councillor Hammond responded to state that there should be a broader communication regarding parking policies to residents and would consider the timing in which to do it.

Councillor Yule wanted to clarify if there were changes being made to the 30 minute limit.

Councillor Hammond responded to state that the changes related just to the RingGo app and the 20p convenience fee for using the app to park.

Councillor Daly commented that the cash option was still available for customers and parking in the district was cheaper than other local areas.

Councillor Hammond highlighted that there should be an improvement for consumers with a single route of using one app.

Councillor Jepson queried if there had been a reduction in the number of collections being made or were there no collections being made at all.

Councillor Hammond responded that there had be a huge reduction in the number coins needing to be transported around the district which had translated to tangible carbon savings calculated by the Parking Services Team.

Councillor Byatt referenced the previous administration's action to review parking tariffs across the district and queried if there had been a review regarding the accessibility of machines for community members in wheelchairs.

Councillor Hammond responded to stated that the parking review process was being undertaken on a town by town basis to deliver a more customized set of parking tariffs that are suitable to each town. A future part of the review would be the current schedule of tariffs. This would be a future piece of work.

The Head of Operations added that East Suffolk Council participates in the British Parking Association's Park Mark accreditation. As part of that the whole car park is assessed. It was not possible to have all car parks completely accessible. A good number across the district are and increasing accessibility continues to be explored when possible.

In debate Councillor Smith-Lyte added that keeping the cash element was important due to problems with using the RingGo app that could occur and not blocking people throughout digitisation.

Councillor Hammond agreed and confirmed the commitment to retain the coin operated machines and make sure they were in working order. The National Parking Platform hoped to create some competition between apps and usability could be considered a draw for people to use what they know work.

On the proposition of Councillor Hammond seconded by it was Smith-Lyte it was

RESOLVED

1. That Cabinet approves Option 2 to agree changes proposed by RingGo to the terms and conditions of the current contract.
2. That Cabinet approve ESC joining the National Parking Platform ideally as part of the pilot scheme.

7 Renewal of Dog Related Public Space Protection Orders

Councillor Smith-Lyte the Cabinet Member with responsibility for The Environment introduced the Report ES/1754 which related to the Renewal of Dog Related Public Space Protection Orders (PSPO).

The report sought approval for the renewal of the 3 existing PSPOs which were dogs on lead in general, Aldeburgh Beach, Controls and restrictions on Dogs (and other activities) at Landguard Point and covered a number of areas, as outlined in the report.

Councillor Smith-Lyte highlighted that from a consultation over 80% of feedback was positive to the renewal of the PSPOs.

It was noted there was a typographical error in the report regarding the expiration date of the PSPOs which should have read 3rd January 2027.

There were no questions from Cabinet.

Councillor Byatt stated that it was good there were replies received and thank Councillor Smith-Lyte and the team for an interesting report. He enquired about the number of enforcement notices given out. Councillor Byatt also enquired if there had been any reported incidents with American bully cross dogs.

Councillor Smith-Lyte advised that she would need to find out and report back.

The Senior Environmental Protection Officer advised there had been a number of executions of the PSPOs.

The Leader added that dogs should be under control at all times and stated that it was hard to police and enforce restrictions.

Councillor Daly wished to advocate for dogs and whilst dog safety was paramount, dogs need spaces to be able to run off lead.

On the proposition of Councillor Smith-Lyte seconded by Councillor Ashton it was

RESOLVED

1. That the renewal of both the Exclusion of Dogs from Aldeburgh Beach and Dogs on Leads General Public Space Protection Orders as detailed in Appendices E and G to the report and amended to correct the typographical error in the expiration dates be approved.
2. That the proposed amendments and renewal of the Landguard Nature Reserve Public Space Protection Order as detailed in Appendix F to the report be approved.

8 Strategic Recruitment Partner Procurement

Councillor Ashton the Cabinet Member with responsibility for Corporate Services – Digital, Customer Services, HR and Assets introduced report ES/1759 which related to the Strategic Recruitment Partner Procurement

The report sought approval to go out to tender for a recruitment partner to support the recruitment needs of the council. The contract would be up to five years with break clauses at years two and four.

The process will seek a recruitment partner motivated to recruit permanent staff. Recruitment had become more challenging in recent years and the number of agency contractors had increased. Agencies staff / contracts were more costly to the organisation.

Service areas had gone to agencies directly, which missed the potential for economies of scale to be achieved and made it harder to track procurement spend on agency costs.

Councillor Ashton stated that the contract set out a framework of charges which charges on a 'pay as you go basis'.

Councillor Ashton concluded that the report was at Cabinet as it was anticipated over the period of the contract the spend would likely exceed his authorisation limit.

There were no questions from Cabinet

Councillor Byatt stated he welcomed the report, highlighted PG175 contract rules and regulations and queried if it should include the procurement and contract management strategy 2022 -2025 as part of the statement for the procurement process.

The Strategic Director responded to state the strategy document was what all procurement was done by and this procurement process would be carried out in line with that strategy.

Councillor Byatt stated he was very proud of previous work undertaken.

On the proposition of Councillor Aston, seconded by Councillor Yule it was

RESOLVED

That Cabinet approves for authority to be delegated to the Strategic Director with responsibility for Corporate Services, in consultation with the Portfolio Holder for Corporate Services, to tender and award the contract for a strategic recruitment partner, on terms that best protect the Council's interests and after undertaking a procurement exercise pursuant to the Council's Contract Procedure Rules and Public Contract Regulations 2015.

9 Equality, Diversity and Inclusion Action Plan

Councillor Whitelock the Cabinet Member with responsibility for Communities, Leisure and Tourism introduced report ES/1755 which related to the Equality, Diversity and Inclusion Action Plan.

Councillor Whitelock stated that it was an ambitious document with focus on the 10 protected characteristics. The action plan was developed through two workshops with staff from all teams in the Council. Centred around equal outcomes for everyone in East Suffolk with a set of principles to tackle inequalities.

The Council stated to be an:

- Inclusive employer
- Community leader

- Think equality in all things it does

There were no questions from Cabinet or members in attendance.

During debate Councillor Daly stated he was glad to see socio economic disadvantages highlighted in the document. He queried if asylum seekers and refugees were considered. There was an implication however the group were not specifically highlighted.

Councillor Whitelock agreed it was implied within the document.

The Head of Communities responded to state that asylum seekers and refugees would be picked up under the race element of the action plan and that it was important to add the socio economic disadvantage element for consideration.

Councillor Langdon-Morris wished to second Councillor Daly's comments and had spotted asylum seekers and thanked him for the point made.

Councillor Whitelock concluded the debate to confirm it would be picked up within the action plan.

On the proposition of Councillor Whitelock, seconded by Councillor Smith-Lyte it was

RESOLVED

That Cabinet approve the new East Suffolk Council Equality, Diversity and Inclusion Action Plan and that all Councillors and officers of the Council play an active role in embedding Equality, Diversity and Inclusion in all that we do as a Council.

10 Environment Task Group - Quarterly Update

Councillor Smith-Lyte the Cabinet Member with responsibility for The Environment introduced report ES/1756 which related to the Environment Task Group – Quarterly Update.

Councillor Smith-Lyte outlined that the group has been re-established with a collaborative cross group full of members passionate about the environment. A wide range of topics were being considered. The group were looking forward to bringing recommendations to Cabinet in the future as well as receiving tasks from Cabinet.

There were no questions from Cabinet.

Councillor Byatt thanked Councillor Smith-Lyte and the team for the report and noted there were a number of matters considered for discussion. Councillor Byatt highlighted that it would be good to know the timelines for the work programme.

Councillor Byatt also highlighted the task and finish group established from the recent Full Council motion and that the two groups should link with each other.

Councillor Byatt queried if the previous motion for the Ocean would be brought back for consideration. It was appreciated the motion was from the previous administration.

Councillor Smith-Lyte thanked Councillor Byatt for raising the questions and would take it to the next meeting for review.

Councillor Jepson sought clarity on the areas being considered, direction and what action the group would be taking.

Councillor Jepson highlighted a previous motion brought by Councillor Smith-Lyte in 2019 regarding Citizen Assemblies, and queried if that would come under lobbying.

Councillor Smith-Lyte stated that Citizen Assemblies were not strictly about lobbying and they were something she continued to feel passionately about. Citizen Assemblies were complicated to implement correctly. Councillor Smith-Lyte reflected that the group started with a massive wish list of important areas to look at and they have been working on reducing these to a more focused list. But recognised this was a huge area to consider, with so much to do.

The Leader stated that the group needed to be a deep dive task and finish group, rather than a lobbying group.

Councillor Jepson responded that he was not entirely convinced about the direction of the group and queried what the group would be focussed on, what an action plan would look like and hoped that after the next meeting there would be clearer perspective.

Councillor Yule stated there were Community Partnerships (CPs) in place and wondered if there was a link to be made to include a topic on an agenda for discussion at a CP.

Councillor Smith-Lyte responded to state that a Community Partnership would be one part of it. However the idea of Citizen Assemblies you hear from experts, however the people in the room are randomly selected to be there and drew comparison to the jury service system to highlight her point.

Councillor Candy responded to Councillor Jepson's point to state that the group were trying to address topics with great clarity and form a clear way forward.

Councillor Langdon-Morris highlighted point H in the report which was to consider the best ways of engaging the key partners of the council on environmental issues. Councillor Langdon-Morris highlighted the excellent work set up by Councillor Mallinder regarding weeds and bees. He felt it could do with a tweak, and if the Environmental Task Group could give a clear steer to Parish Councillors on how parks are managed. That would include involving them in the allocation process of areas for re-wilding and which areas should be left, as there can be clashes between Parish Councillors and the public.

Councillor Langdon-Morris stated that this would reduce the amount of mowing that would need to be done. This would have time and cost saving implications.

The Leader requested some rebranding, guidelines and a steer on increasing community engagement regarding the rewilding (Pardon the Weeds) scheme from the Task and Finish group.

Councillor Langdon-Morris supported the rebranding and highlighted the support that could be offered to Parish councillors in liaising with the public to understand park management more comprehensively.

Councillor Byatt stated he would like to see Citizen Assemblies be discussed further. He wished to apologise if the impression was given that the Task and Finish Group were not making progress. There have been a couple of good meetings, with a direction which needs to tie into the Environmental Task Group.

Councillor Smith-Lyte added that she was aware there needed to be some rebranding and there were some ideas going around. The work of the previous group was being built on and recognised the need to support Parish Councils and public communications.

On the proposition of Councillor Smith-Lyte, seconded by Councillor Hammond it was

RESOLVED

1. That the report from the Environment Task Group be accepted and approved.
2. That Cabinet confirms that the Group is to continue to deliver the task it was set.

11 Exempt/Confidential Items

On the proposition of Councillor Hammond, seconded by Councillor Ashton it was

RESOLVED

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

12 Community Asset Transfer of Public Open Space to Rushmere Parish Council

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

The meeting concluded at 7.45pm.

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CABINET
Tuesday, 02 January 2024

Subject	Fees and Charges for the Financial Year 2024/25
Report by	Councillor Vince Langdon-Morris Cabinet Member with responsibility for Resources and Value for Money
Report Author(s)	Danielle Patterson Acting Financial Planning Manager Danielle.patterson@eastsoffolk.gov.uk
Head of Service	Lorraine Rogers Chief Finance Officer and Section 151 Officer Lorraine.rogers@eastsoffolk.gov.uk
Director	Chris Bally Chief Executive 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:

The purpose of this report is to recommend to Cabinet a schedule of fees for discretionary services provided by the Council during the financial year April 2024 to March 2025. The report also notifies Cabinet of statutory fees chargeable during the same period, which are set by various other governing bodies.

Options:

The charges presented to Cabinet within the schedule have been recommended based on some key principles, such as customer affordability, cost recovery and commercial acumen. However, the option exists to not increase or to lower uplifts applied to fees and charges for 2024/25.

Recommendation/s:

That Cabinet:

1. Approves the discretionary Fees and Charges for 2024/25, included within **Appendix A** to this report.
2. Notes the statutory Fees and Charges for 2024/25, included within **Appendix A** to this report.
3. Grants the Head of Environmental Services and Port Health delegated authority, in consultation with the Cabinet Member with responsibility for Community Health, to determine the Port Health discretionary charges for 2024/25, once regulatory information is made available.

Corporate Impact Assessment

Governance:

None arising directly from this report.

ESC policies and strategies that directly apply to the proposal:

East Suffolk Strategic Plan.

Environmental:

None arising directly from this report.

Equalities and Diversity:

Equalities Impact Assessment (EqIA) has been prepared in respect of various service areas where fee increases are proposed. No adverse impacts have been identified.

Financial:

The fees and charges proposals are intended to broadly reflect a 3% increase despite the higher levels of inflation¹ being experienced in the 12 months to date. The financial impact of this is that inflationary pressures are therefore being managed via means other than fees and charges, where possible. Where legislation permits cost recovery of specific

¹ CPI for October 2023 according to ONS is 4.6% - [Consumer price inflation, UK - Office for National Statistics](#)

services, those services are priced in line with the approach prescribed, thereby limiting the financial impact.

Human Resources:

No direct HR impact is expected to result from these proposals.

ICT:

None arising directly from this report.

Legal:

N/A

Risk:

The changing nature of the current economic climate has resulted in a current cost of living crisis, therefore, demand for discretionary services may be suppressed. As part of the annual review across discretionary services, managers have sought to balance this with the need to cover the rising cost-of-service delivery.

External Consultees:	Beach Hut and Chalet Association was consulted within 2023/24 regarding fees for beach hut related licenses and services for both Felixstowe and Sizewell.
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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"/>
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 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 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 checked="" 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 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 checked="" type="checkbox"/>
How does this proposal support the priorities selected?			
The annual fees and charges review provides an opportunity for the Council to review the cost of delivering services and the competitiveness of its pricing strategies and propose changes to allow it to remain financially sustainable.			

Background and Justification for Recommendation

1 Background facts	
1.1	<p>Income from fees and charges is an integral part of the financial planning process, to inform the Medium-Term Financial Strategy (MTFS) and acts as a key element of the annual budget setting process, forecasting the generation of essential funding for the Council to help minimise the impacts of Council Tax increases and/or service changes.</p> <p>It is vital to ensure that the annual fees and charges proposed considers local demand, along with reflecting changes in the cost of delivering the services that have either already occurred or are expected to occur over the next financial year.</p> <p>Overall, it is crucial that the charge setting process considers all financial opportunities and constraints faced by the Council, along with remaining consistent with East Suffolk's Strategic plan and relevant Government legislation, aiming to improve financial sustainability and invest in the services provided.</p>
2 Current position	
2.1	<p>Fees and charges income is a key source of revenue to the Council, providing income in the region of approximately £24 million per annum to the General Fund, including Port Health. The Council's policy is to review fees and charges annually. The Medium-Term Financial Strategy – Key Principles, states the current policy on fees and charges:</p> <p>“Increase existing fees and charges on a market forces basis whilst having regard to the Council's policies and objectives. As a minimum, fees and charges should be</p>

	<p>increased by price inflation. The Council will also review opportunities to introduce new fees as appropriate.”</p> <p>Fees and charges can be categorised into two groups:</p> <ul style="list-style-type: none"> • Discretionary fees and charges for approval by Cabinet; and • Statutory fees and charges that must be set in accordance with legislation and Government regulations. <p>Following approval, the proposed fees and charges will take effect from 1 April and will be reflected within the upcoming years’ service budgets. However, if the fees and charges are set by statute these may vary per the date set by Government regulation.</p>
2.2	<p>Fees and Charges Schedule – Appendix A</p> <p>Appendix A provides a detailed breakdown of the fees and charges for the 2024/25 financial year to be applied by the individual services within the Authority. The fee schedule includes both discretionary and statutory charges and details the proposed charges. The recommended minimum uplift is 3% where appropriate, based on the forecast for CPI over the next twelve months.</p>
2.3	<p>Discretionary fees and charges</p> <p>Discretionary fees represent services which the Council has the power, but not the duty, to provide. Overall, the income generated is restricted to the cost of providing the service but is not restricted on how the costs are calculated, so are an important part of enabling the Council to invest in the services provided. Charges identified as discretionary may also include some statutory services, for which the council sets fees based on legislation, but where there is discretion on how the pricing is set.</p> <p>The proposed discretionary fees and charges for 2024/25 as set out in Appendix A, have been set taking account of the following:</p> <ul style="list-style-type: none"> • Where only the full cost of service provision can be charged, the fee or charge reflects the full cost, including an apportionment of support service costs. • Where the discretionary fee or charge is set at the market rate, these have been benchmarked and set at the appropriate rate considering demand for the service but ensuring that any competitive advantage is neutralised if in competition with the private sector. • Opportunities to introduce new fees as appropriate. • Consideration of the impact of fee change on the use of the services. • Other discretionary fees and charges which do not fall into any of the above, are increased by 3%. The target rate is below the forecast 5.0% inflation rate for the end of the 2023 calendar year. <p>Building Regulation charges are no longer published at the request of the Head of Planning and Coastal Management. This is because there is considerable competition from the private sector for the provision of this service and the publication of the Council’s charges in this area would result in the Building Regulation service facing a competitive disadvantage and loss of income.</p>

2.4	<p>Fees and charges which have been subject to key changes contained within Appendix A are highlighted below.</p> <p>Environmental health (Appendix A, section 1): New charges have been introduced in recognition of the additional effort required to regulate new activities for protection of residents. An administration charge is also now introduced in recognition of the resource required to deliver public health funerals.</p> <p>Dog control administration and kennelling fees are proposed to increase from £40 and £17, to £42 and £18.</p> <p>Safer Food, Better Business fees have a proposed uplift of 4.55%, increased to reflect the need to recover costs. The average fee impact totals £1.</p> <p>Additional Fixed penalty notices have been raised within 2024/25 for both fly tipping and offences regarding commercial waste receptacles, proposed standard penalties totalling £150 and £100. An additional set charge of £562.50 is also proposed for the seizure of noise making equipment without prosecution. Following the return of the enforcement service in house within 2023/24. The costs and administration requirements have been closely monitored and fees adjusted and added accordingly.</p> <p>Port Health (Appendix A, section 1.15): Suffolk Coastal Port health service has completed an in-depth time and study motion to identify the actual costs of delivering the services, to ensure cost recovery is achieved.</p> <p>Vessel inspection fees currently reflect a nil increase from 2023/24 but are currently set in accordance with APHA. Further guidance is expected within 2024.</p> <p>Some charges are heavily reliant on published information which is not yet available so fees may be subject to a small increased prior to the implementation on 1 April 2024.</p> <p>Licences (Appendix A, section 2): The majority of the discretionary fees have been increased by 3%, and many of the statutory fees are subject to no change.</p> <p>Parking services (Appendix A, section 4.1): Core parking service fees which came into force on 21 August 2020 remain unchanged. Suspension fees relating to both Off-street and On-street parking places have continued to remain the same following evidence indicating it takes a similar level of resource to process both. In allocated areas season and annual tickets will be made available to reflect changing demand patterns. The 2024/25, fees also exclude sites such as The Elms and Framlingham, due to them no longer being within the authority's ownership.</p> <p>Household waste services (Appendix A, section 4.3): Waste services have been impacted significantly by inflationary pressures post pandemic, predominantly rising fuel, gate fees and staffing cost increases. East Suffolk Council are working alongside East Suffolk Services Limited (ESSL) to continually review the overall costs of supplying services to ensure the services remain efficient, effective and reflect good value for money.</p>
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For 2024/25 charges, It is proposed that household waste charges for bulky items are increased by the recommended 3%, following higher uplifts in prior years.

Garden Waste services have been impacted significantly by inflationary pressures. Therefore, the proposal is to increase the garden waste collection service fee by £1.50 or 5%, to £52.50, to support the cost of delivering the service.

Finally, developer bin delivery charges are proposed to increase significantly to reflect the rising costs of fuel and staffing costs following a review of the services provided by East Suffolk Services Limited (ESSL), an increase of £45 to £75. This service was previously operating at a loss, with the uplift reflecting to true cost of providing the service.

Southwold harbour and caravan-camp site (Appendix A, Section 4.5 & 4.4): The Southwold Harbour Management Committee considered the proposed fees and charges at its meeting on 9 November and are recommended to Cabinet in a separate report. Following the committee decision, the fees are detailed within the attached appendices factoring a 3% uplift.

Recreation and outdoor sports (Appendix A, section 4.6): Following the work completed within 2023/24 to re-align fees across East Suffolk for both North and South of the district, the recommended approach for 2024/25 is to uplift fees by the recommended 3%. The Felixstowe Cricket and Rugby Pitches have been removed following a new lease agreement between the Council and Felixstowe Sports Club to lease the facilities directly.

Following recent announcements from HMRC surrounding VAT implications for public authority leisure services, detailed within **Appendix A**, charges may be subject to further VAT adjustments prior to the publication in the new financial year.

Beach huts & chalets (appendix A, section 4.8): A 5% increase has been agreed with the Beach Huts Association for the licence of beach hut sites in Sizewell, Felixstowe and Lowestoft. Fee uplifts of 5% have also been applied to Felixstowe chalets for 2024/25.

New additional beach hut rentals were included from 2023/24 reflecting the huts which the Council has recently build or brought back in house from third party operators. As these are new, the Council is still working to balance the pricing with its regeneration ambitions in the area. Therefore, for 2024/25, no price increase has been proposed for these beach hut rentals.

New fees have been introduced for 2024/25 following the addition of new Seashore Village Accessible Beach Chalets.

Cemeteries (Appendix A, section 4.9): The recommended 3% uplift has been applied to all services provided by Cemeteries, including Green Burial and Commemorative Benches with the exclusion of exhumations. The charge in relation to exhumation's has been proposed to increase from £1,203, to £2,340. The proposed fee uplift reflects the historic nature of the original charge and

following a review, the new charge factors the current costs associated with providing the service.

Oulton Broad Yacht Station (Appendix A, section 4.12): Visitor moorings for 24-hour periods have proposed increased in order to remain in line with equivalent service providers. Water top up charges are proposed to increase by £1, to £2, the first uplift in eight years. Weekly Buoy charges are proposed to increase from £40, to £45, which equates to an increase of £0.71 per day.

Planning Applications and Planning Related Applications (Appendix A, section 5.5): The fees for Planning Applications and for Planning related applications are set by National Government through The Town and Country Planning Regulations 2012, which have been amended more than once. The latest of changes were made 8 November 2023 and came into force 6 December 2023.

The latest amendments to the Regulations included significant complex changes, resulting in significant increases to fees of up to 25% or 35%, but also included the insertion of additional fee thresholds and as a result, different payment levels for each threshold. Therefore, no direct correlation remains between prior financial years for the fee rate categories provided. Based on these changes, fees have been removed from the schedule and translated into a simpler format embedded within the fees and charges document.

The 2023 amendments to the fee regulations also introduced a new process for future adjustments to the planning fees. They are to be indexed linked as of 1 April 2025, so will likely increase year on year from that time. However, they will remain to be set nationally, and officers expect that the adjusted fees will be published annually on a national basis; the timing for those fees lists remains unknown.

Public path orders & agreements (Appendix A, section 5.6): Public path orders and agreements can only be recharged at cost. A review was undertaken between districts, which identified that the average fee was significantly higher than the fee presented within the fees and charges information. For 2024/25, it is proposed that the hourly charge is revised to £74, an increase of £9.17 and the initial applicant fee is revised from £400 to £500.

Housing services (Appendix A, Section 6): Housing continues to review and improve the services offered ensuring that services are completed on a cost recovery basis in order to remain sustainable. Using this rationale, park home fees propose increases of 5.93% for processing, inspections and the issue or amendments of licences.

Enforcement fees are also proposed to increase from £59 to £62.50 plus officer time.

For 2024/25, additional charges have been introduced to support the increased administration need, assisting with Energy efficiency installers ECO4 declarations. Additional charges have also been raised to support the administration of Shared Ownership facilities, minimising the financial impact within the Housing Revenue Fund (HRA).

2.5	<p>Statutory fees and Charges – Appendix A</p> <p>Appendix A contains fees and charges that have been set by legislation or by organisations other than the Council and are clearly indicated within the Fee Status column as ‘ST’. Therefore, there is no requirement to make pricing decisions on the services listed and are therefore gathered into a repository for ease of reference for residents.</p>
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3 How to address current situation

3.1	<p>Cabinet is asked to consider and approve the schedule of Discretionary Fees and Charges for 2024/25 as set out in Appendix A and to note the schedule of Statutory Charges as set out in Appendix A. The date for implementation of the discretionary fees is 1 April 2024, unless otherwise stated.</p>
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4 Reason/s for recommendation

4.1	<p>To set the Council’s discretionary fees and charges from 1 April 2024, considering significant inflationary pressures, changes to services and the operating environment of the Council.</p>
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Appendices

Appendices:	
Appendix A	Fees and Charges 2024/25

Background reference papers:	
None.	

Fees and Charges

2024/25

East Suffolk Council



FEES AND CHARGES NOTE

Note

Generally any increase in fees and charges will take effect from 1 April 2024 and apply through to 31 March 2025. Details of variations from this date are included in the schedule.

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

Fee Status Key

- D Discretionary Fee
- ST Statutory Fee

VAT Code Key

The current standard rate of VAT is 20%.

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

- S Standard Rated
- EX Exempt
- OS Outside Scope
- ZE Zero Rated

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ENVIRONMENTAL & PORT HEALTH

1.1 Charges for licences

	2024/25	Fee Status	VAT Status
Animal welfare			
Pet shops **	£330.00	D	OS
Dog breeding establishments **	£330.00	D	OS
Dangerous wild animals **	£490.00	D	OS
Animal boarding establishments **	£330.00	D	OS
Home Boarding Franchise (“Arrangers”) If the number of “Hosts” exceeds 6, an additional £72.00 fee will be charged per 6 “Hosts”			
Riding establishments Application Fee	£173.00	D	OS
Grant fee 1 year Licence	£150.00	D	OS
Grant fee 2 year Licence	£262.00	D	OS
Grant fee 3 year Licence	£362.00	D	OS
Additional fee for each additional activity *	£73.00	D	OS
Re-rating request *	£168.00	D	OS
Appeal inspection fee *	£168.00	D	OS
Variation Application Fee-			
1 star	£150.00	D	OS
2 star	£76.00	D	OS
3 star	£52.00	D	OS
4 star	£38.00	D	OS
5 star	£31.00	D	OS
Paperwork only variation (all ratings)*	£31.00	D	OS
All the above fees marked with an asterisk (*) plus vet fees at cost, if required			
All the above fees marked with a double asterisk (**) an application fee of £160.00 must be paid when the application is submitted. The balance is payable when the licence is ready to be issued.			

ENVIRONMENTAL & PORT HEALTH

1.1 Charges for licences (continued)

	2024/25	Fee Status	VAT Status
Advice regarding various licences			
Hourly rate	£79.00	D	S
Zoo licensing			
Notice of intention to apply for a zoo licence	£145.00	D	OS
Application for the grant of a new zoo licence for four years	£505.00	D	OS
Special inspection of licenced zoo	£180.00	D	OS
Periodic inspections (renewal & every three years)	£735.00	D	OS
<i>Vet inspection fees are in addition to all animal welfare licences</i>			

ENVIRONMENTAL & PORT HEALTH

1.2 Local Authority Pollution Prevention & Control (LAPPC)

	2024/2025	Fee Status	VAT Status
Environmental Permitting (England & Wales) Regulations 2016 (NAT F)			
Initial application for permit	£1,650.00	ST	OS
Additional fee for operating without a permit	£1,188.00	ST	OS
Reduced fee activities (except Vehicle refinishers)	£155.00	ST	OS
PVR I & II combined	£257.00	ST	OS
Vehicle Refinishers (VRs)	£362.00	ST	OS
Reduced fee activities : additional fee for operating without a permit	£71.00	ST	OS
Where the process comprises mobile crushing and/or screening plant			
First and second application	£1,650.00	ST	OS
Third to seventh application	£985.00	ST	OS
Eighth and subsequent applications	£498.00	ST	OS
Additional fee for an application if any of the above is combined Part B and Waste Application	£279.00	ST	OS
The above fee period is April 2023 to March 2024, and we expect to be notified of the fees for 2024/25 in April 2024. Charging scheme for Local Authorities: Part B installations and mobile plant and solvent emission activities https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/636243/env-permit-part-b-fees-2017.pdf			
<u>These fees have not been updated since 2017 by Defra.</u>			

Reduced fee activities are; Service Stations, Vehicle Refinishers, dry cleaners and small waste oil burners under 0.4MW.

Newspaper advertisements may be required under EPR at the discretion of the Council as part of the consultation process when considering an application (Chapter 9 of the General Guidance Manual - see link below). This will be undertaken and paid for by the Council and the charging scheme contains a provision for the Council to recover costs.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/211863/env-permitting-general-guidance-a.pdf

Subsistence charges can be paid in four equal instalments paid on 1st April, 1st July, 1st October and 1st January. Where fee is paid quarterly there is an additional fee of £36.00.

ENVIRONMENTAL & PORT HEALTH

1.2 Local Authority Pollution Prevention & Control (LAPPC) (continued)

Annual Subsistence	2024-25			Fee Status	VAT Status
	Low	Medium	High		
Standard process (The additional amounts in brackets must be charged where a permit is for a combined Part B and Waste installation)	£772.00	£1,161.00	£1,747.00	ST	OS
	[£104.00]	[£156.00]	[£207.00]	ST	
Reduced fee activities	£79.00	£158.00	£237.00	ST	OS
PVR I & II combined	£113.00	£226.00	£341.00	ST	OS
Vehicle Refinishers (VR's)	£228.00	£365.00	£548.00	ST	OS
Where the process comprises mobile crushing and/or screening plant					
First and second application	£626.00	£1,034.00	£1,551.00	ST	OS
Third to seventh application	£626.00	£1,034.00	£1,551.00	ST	OS
Eighth and subsequent applications	£385.00	£617.00	£924.00	ST	OS
Late payment fee	£52.00	£52.00	£52.00	ST	OS

The above fee period is April 2023 to March 2024, and we expect to be notified of the fees for 2024/25 in April 2024. Charging scheme for Local Authorities: Part B installations and mobile plant and solvent emission activities https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/636243/env-permit-part-b-fees-2017.pdf

These fees have not been updated since 2017 by Defra.

Where a Part B installation is subject to reporting under the E-PRTR Regulation there is an additional fee of £99.00 to the above amounts unless additional fee has already been indicated.

ENVIRONMENTAL & PORT HEALTH

1.2 Local Authority Pollution Prevention & Control (LAPPC) (continued)

	2024/25	Fee Status	VAT Status
Transfer and Surrender			
Standard process transfer	£169.00	ST	OS
Standard process partial transfer	£497.00	ST	OS
New operator at low risk reduced fee activity	£78.00	ST	OS
Reduced fee activities: partial transfer	£47.00	ST	OS
Temporary transfer for mobiles			
First transfer	£53.00	ST	OS
Repeat following enforcement or warning	£53.00	ST	OS
Substantial change			
Standard process	£1,050.00	ST	OS
Standard process where the substantial change results in a new PPC activity	£1,650.00	ST	OS
Reduced fee activities	£102.00	ST	OS
A2 Processes			
Application	£3,363.00	ST	OS
Additional fee for operating without a licence	£1,188.00	ST	OS
Annual subsistence fee : Low	£1,343.00	ST	OS
Annual subsistence fee : Medium	£1,507.00	ST	OS
Annual subsistence fee : High	£2,230.00	ST	OS
Late payment fee	£52.00	ST	OS
Substantial variation	£1,368.00	ST	OS
Transfer	£235.00	ST	OS
Partial transfer	£698.00	ST	OS
Surrender	£698.00	ST	OS
Standard process where the substantial change results in a new PPC activity	£3,363.00	ST	OS

The above fee period is April 2023 to March 2024, and we expect to be notified of the fees for 2024/25 in April 2024. Charging scheme for local authorities: Part A (2) installations and small waste incineration plants (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/636245/env-permit-part-a2-fees-2017.pdf) These fees have not been updated since 2017 by Defra.

ENVIRONMENTAL & PORT HEALTH

1.3 Scrap metal dealers (Scrap Metal Dealers Act 2013)

	2024/25	Fee Status	VAT Status
Site Licence			
Assessment for a new licence	£454.00	ST	OS
Assessment for variation of a licence	£185.00	ST	OS
Assessment for a renewal	£350.00	ST	OS
Collectors Licence			
Assessment for a new licence	£265.00	ST	OS
Assessment for variation of a licence	£102.00	ST	OS
Assessment for a renewal	£225.00	ST	OS

ENVIRONMENTAL & PORT HEALTH

1.4 Charges for registration

	2024/25	Fee Status	VAT Status
Skin piercing			
Tattooing, micropigmentation/semi-permanent makeup, cosmetic-piercing (including ear-piercing), electrolysis, and acupuncture (Premises)	£298.00	D	OS
Tattooing, micropigmentation/semi-permanent makeup, cosmetic-piercing (including ear-piercing), electrolysis, and acupuncture (Persons)	£175.00	D	OS
Add a skin piercing activity to an existing registration.	£92.00	D	OS
Replacement or duplicate registration certificate (electronic and/or paper).	£31.00	D	OS
Change of a person's name (electronic and/or paper).	£31.00	D	OS

1.5 Food premises register

	2024/25	Fee Status	VAT Status
Copy of food premises register	£162.00	D	OS
Copy of food premises register - single entry	£22.00	D	OS

1.6 Certificates & health charges

	2024/25	Fee Status	VAT Status
Issuing of export health certificate - Local Authority or Food Safety Premises Endorsement for Export	£135.00	D	OS
Issuing of export health certificate - APHA (Association of Port Health Authorities')	£260.00	D	OS
Issuing of export certificate of conformity	£105.00	D	OS
Issue of voluntary surrender certificates	£200.00	D	OS
Disposal of food	n/a	D	OS

ENVIRONMENTAL & PORT HEALTH

1.7 Food hygiene ratings

	2024/25	Fee Status	VAT Status
Revisit	£206.00	D	OS

1.8 Safer Food, Better Business (SFBB)

	2024/25	Fee Status	VAT Status
SFBB for caterers	£23.00	D	ZE
SFBB for caterers with residential care homes supplement	£23.00	D	ZE
SFBB for retailers	£23.00	D	ZE
SFBB Indian, Pakistani, Bangladeshi and Sri Lankan cuisines	£23.00	D	ZE
SFBB Chinese cuisine - English language version	£23.00	D	ZE
SFBB Chinese cuisine - Cantonese language version	£23.00	D	ZE
SFBB childminders	£14.00	D	S
12 month diary pack	£7.50	D	S

ENVIRONMENTAL & PORT HEALTH

1.9 Dog control

	2024/25	Fee Status	VAT Status
Costs of reclaiming a stray dog	£138.00	D	OS
Surcharge for dogs with no/unregistered/out-of-date/otherwise invalid microchip	£46.00	D	OS
Plus administration costs	£42.00	D	OS
Plus daily kennelling fees	£18.00	D	OS
Plus vet fees at actual cost			

1.10 Provision of supplementary environmental information

	2024/25	Fee Status	VAT Status
This is at the Council's discretion, having regard to relevant factors (in accordance with ICO - Information Commissioner's Office- guidance) this fee will be waived for very simple enquiries and non commercial enquiries	£119.00	D	OS
Complex requests (i.e. taking more than 2 hours to process):			
Flat Rate	£119.00	D	OS
Plus charge per hour	£78.00	D	OS

ENVIRONMENTAL & PORT HEALTH

1.11 Fixed penalty notices (FPNs)

<u>Offence</u>	Standard Penalty (14 days)	Amount if paid within 14 days	Maximum fine for offence through the court process	Fee Status	VAT Status
Nuisance parking	£105.00	£62.00	n/a	D	OS
Vehicle abandonment	£206.00	£105.00	n/a	D	OS
Litter	£150.00	£80.00	£2,500.00	D	OS
Fly Tipping	£500.00	£250.00	£50,000 or imprisonment	D	OS
Leaflet distribution	£85.00	£62.00	£2,500.00	D	OS
Graffiti and Fly posting	£85.00	£62.00	unlimited	D	OS
Failure to produce waster transfer note	£310.00	£186.00	unlimited	D	OS
Failure to provide waste carrier licence	£310.00	£186.00	unlimited	D	OS
Offences regarding waste receptacles (domestic)	£82.00	£62.00	£1,000.00	D	OS
Offences regarding waste receptacles (Commercial)	£100.00	£75.00	£5,000.00	D	OS
Breach of Public Space Protection Order (PSPO)	£82.00	£62.00	£1,000.00	D	OS
Breach of Community Protection Notice (CPN)	£100.00	£60.00	n/a	D	OS
Householder waste duty of care	£300.00	£180.00	n/a	D	OS
Smoke Free - Failure to provide signage to prohibit smoking in a prohibited place	£200.00	n/a	n/a	ST	OS
Smoke Free - Smoking in a prohibited place	£50.00	£30.00	n/a	ST	OS
Seizure of noise making equipment without prosecution - Set Charge			562.5	D	OS

ENVIRONMENTAL & PORT HEALTH

1.12 Public Health funeral administration

	2024/25	Fee Status	VAT Status
Administration fee	£360.50	D	OS
Death certificate costs	£11.00	D	OS
Funeral expenses incurred	<i>Actual Cost</i>	D	OS

1.13 Private Water Supplies Regulations 2016 Sampling

To carry out a risk assessment under Regulation 6 of The Private Water Supplies Regulations 2016.

	2024/25	Fee Status	VAT Status
Risk Assessment			
	<i>Hourly rate (as below)</i>	D	OS
Risk Assessments and investigations undertaken by ESC officers will be charged on a 100% cost-recovery basis			
Risk Assessment and investigations carried out by a contractor	<i>Actual cost</i>	D	OS
	<i>Hourly rate (as below)</i>	D	OS
Officer time supporting contractor activities (administration of sampling, data management and correspondence)			
Sampling			
	<i>Hourly rate (as below)</i>	D	OS
Sampling costs will be charged on a 100% cost recovery basis			
Sampling costs will also include elements to recover the actual third party costs of transporting samples to the laboratory	<i>Actual cost</i>	D	OS
	<i>Hourly rate (as below)</i>	D	OS
Sampling costs will include an element to recover the administrative costs, data management, correspondence etc.			
Revisit to verify failed result (applies only to the first revisit for re-sampling to verify failed parameters)	No charge	D	OS
	<i>Actual cost</i>	D	OS
Analysis of all samples will be charged at the cost charged to ESC by the laboratory (including re-samples to verify failed parameters)			
Hourly Rate			
Officer time hourly rate (includes on-costs and overheads)	£60.00	D	OS
Missed appointments			
	Hourly Rate (as above)	D	OS
Missed appointments for sampling or risk assessments will attract fees at the standard rate unless cancelled at least 48 hours beforehand			

ENVIRONMENTAL & PORT HEALTH

1.14 Lowestoft Port Health - Charges for Inspections of ships (Ship Sanitation Inspection Certificates)

Where legislation requires that sampling and analysis is carried out, charges will include the cost of any materials such as sterile scoops that are needed.

	2024/25	Fee Status	VAT Status
Ship Sanitation Inspection Charges			
A fixed fee will be charged for Ship Sanitation Inspections at the current rates agreed by the Association of Port Health Authorities.			
- Ships up to 1,000 gross tonnage	£125.00	D	OS
- Ships from 20,001 to 30,000 gross tonnage	£415.00	D	OS
- Ships over 30,000 gross tonnage	£480.00	D	OS
With the exception of:			
Vessels with the capacity to carry between 50 and 1,000 persons	£480.00	D	OS
Vessels with the capacity to carry more than 1,000 persons	£820.00	D	OS
Extensions	£95.00	D	OS

The fees are reviewed annually and will not be available until January 2024.

<https://www.porthealthassociation.co.uk/>

ENVIRONMENTAL & PORT HEALTH

1.15 Port Health - Suffolk Coastal Port Health Authority

Port Health inspection charges are calculated annually on a cost recovery basis

This means that the charges represent the cost of overheads plus third party costs, including staff office space and other equipment plus the cost of any materials needed.

For many products the cost of the sample varies depending on size and the nature of the analysis.

<https://www.legislation.gov.uk/eur/2017/625/contents>

We continually monitor our activities to check that we are providing a good service to our stakeholders. We continue to develop new ways of working to streamline our service delivery by reviewing our working practices and adopting IT and mobile working solutions. It is anticipated that this will ensure that our operating costs, and hence charges, are kept to a minimum in the future.

Online payments can be made below.

<https://ip.e-paycapita.com/AIP/itemSelectionPage.do?link=showItemSelectionPage&siteId=697&languageCode=EN&source=AIP>

Products of Animal Origin (POAO)	2024/25	Fee Status	VAT Status
Charges for POAO imports are based on the gross weight of the product rounded up to the next full tonne.			
There are two levels of charge, a standard charge which applies to the majority imported products and one that applies to those from New Zealand, which is reduced to reflect the lower amount of work that we carry out in respect of these imports as a result of an Equivalence Agreement between the EC and New Zealand.			
The charges are calculated annually based on the exchange rate between sterling and the ECU.			
All imported products			
Consignments up to 6 tonnes minimum charge	£61.68	D	OS
Additional tonnage between 7 - 46 tonnes (per tonne)	£10.24	D	OS
Consignments over 46 tonnes maximum charge	£469.05	D	OS
Products which transit through Great Britain (Entry/Exit)			
Minimum fee	£33.70	D	OS
Increasing by, per 15 minutes for every member of staff involved in the controls	£23.69	D	OS
All products of Animal Origin from New Zealand			
Consignments up to 6 tonnes minimum charge	£47.84	D	OS
Additional tonnage between 7 - 46 tonnes (per tonne)	£7.82	D	OS
Consignments over 46 tonnes maximum charge	£364.04	D	OS
Other administration charges for CHED-P's (Common Health Entry Document for products of animal origin)			
Sale of fish from C Where Parent and Daughter CHEDs (Common Health Entry	£54.16	D	OS

Additional charges for statutory sampling will be made as required

ENVIRONMENTAL & PORT HEALTH

1.15 Port Health - Suffolk Coastal Port Health Authority (continued)

	2024/25	Fee Status	VAT Status
High Risk Products - CHED charges			
Document check	£64.98	D	OS
Sampling (<i>additional analytical costs apply for all sampling fees</i>)			
Less than 10 sub samples	£88.46	D	OS
10 - 59 sub samples	£119.74	D	OS
60 or more sub samples*	£161.86	D	OS
<p>*A subsample is the number of units required by the legislation in order to make up a sample that is representative of the whole consignment. Some contaminants, like aflatoxin, are usually not evenly spread throughout whole consignments, therefore warranting larger numbers of incremental samples. This process takes longer and results in a higher fee.</p>			
Where Parent and Daughter CHEDs are required to be submitted there will be an additional charge per daughter CHED in addition to the parent CHED charge.	£54.16	D	OS
Non-compliant consignment	£145.05	D	OS
Gaur Gum from India			
Document check	£64.98	D	OS
Sampling (<i>additional analytical cost apply</i>)	£119.74	D	OS
Non-compliant consignment	£145.05	D	OS
Analytical Cost - Assigned by lab			
Organic Certificate verification			
Certificate verification			
Pre-notification is created on PHILIS DES	£54.16	D	OS
Pre-notification is not created on PHILIS DES	£72.20	D	OS
Issuing a Regulation 7 notice under the Organic Products Regulations 2009	£145.05	D	OS

ENVIRONMENTAL & PORT HEALTH

1.15 Port Health - Suffolk Coastal Port Health Authority (continued)

	2024/25	Fee Status	VAT Status
<p>Catch certification under the IUU fishing controls</p> <p>The following charges are applied per consignment, per country basis. A consignment will be determined as goods covered by a distinct set of documentation e.g. where there is more than one processing statement in the IUU documentation (particularly where it pairs with a CHED-P), it is likely to be processed and charged separately.</p>			
<p>Low risk</p> <p>Imports coming directly from the following flag states are currently defined as low risk</p> <ul style="list-style-type: none"> - EEA/EFTA country (Norway, Iceland, Faroe Islands). - Country with a bilateral agreement with the EU for IUU purposes (USA, Canada, New Zealand), e.g. fish caught by a US fishing vessel and processed in a US approved establishment. <p>Low risk consignment (<i>per flag state country</i>)</p>	£28.72	D	OS
<p>High risk</p> <p>The following imports are currently defined as high risk</p> <ul style="list-style-type: none"> - Fish caught by other third country fishing vessel - Fish from EU/bilateral/EEA/EFTA countries that have been processed in a third country (indirectly imported), e.g. fish caught by a US fishing vessel and processed in a Vietnamese approved establishment. (Fish caught by a vessel registered to an EU/EFTA/bilateral country and subsequently processed in another third country loses its low risk status and is charged at the higher rate.) <p>High risk consignment (<i>per flag state country</i>)</p> <p>Due to the additional work in checking documents from more than one country and checking and handling multiple documents additional charges have been introduced.</p> <p>The appropriate checking fee (low or high risk) listed above is applied for each country that certification is received from. In addition where multiple certificates are submitted to accompany a consignment a sliding scale of charges will be applied.</p>	£56.79	D	OS

ENVIRONMENTAL & PORT HEALTH

1.15 Port Health - Suffolk Coastal Port Health Authority (continued)

Number of certificates	2024/25		Fee Status	VAT Status
	Low risk country	High risk country		
1 - 5	£28.72	£56.79	D	OS
6 - 10	£49.46	£85.51	D	OS
11 - 20	£64.44	£99.55	D	OS
21 +	£78.48	£113.90	D	OS
<i>The number of certificates are counted per country to reflect the amount of work incurred in checking the certification</i>				
Intervention charges				
Charges for consignments requiring verification/ movement control intervention or non-conforming consignments have increased to accurately reflect the amount of additional work required to be undertaken for such consignments.				
- Formal verification / movement control notices		£112.22	D	OS
- Non-compliant IUU consignments		£145.05	D	OS

ENVIRONMENTAL & PORT HEALTH

1.15 Port Health - Suffolk Coastal Port Health Authority (continued)

	2024/25	Fee Status	VAT Status
Plastic Kitchenware from China and Hong Kong			
Document Check			
Due to the additional work in checking and handling multiple documents charges have been introduced based on the number of analytical certificates that accompany the Declaration. The sliding scale of charges will be applied.			
1-5 samples	£55.66	D	OS
6-10 samples	£74.31	D	OS
11-20 samples	£102.29	D	OS
21+ samples	£130.58	D	OS
Identity checks, physical checks and			
The cost of carrying out the identity, physical check and sampling is (subject to a courier fee of £15.00)	£103.91	D	OS
Non-compliant consignment	£145.05	D	OS
Analytical Cost - Assigned by lab			
GM Controls Rice and Rice products from China			
Where a CHED-D is submitted for a product covered by GM and other high risk product controls e.g. rice noodles for aluminium, only one document check charge will apply			
Document check	£64.98	D	OS
Identity check, physical check and taking sample			
Processed products	£88.46	D	OS
Bulk rice	£119.74	D	OS
Non-compliant consignment	£145.05	D	OS
Analyst fee full sample - Assigned by lab			

ENVIRONMENTAL & PORT HEALTH

1.15 Port Health - Suffolk Coastal Port Health Authority (continued)

	2024/25	Fee Status	VAT Status
Ship Inspection Charges for Ship Sanitation Certificates			
The charges are calculated based on the gross tonnage of the vessel			
- Ships up to 1,000 gross tonnage	£125.00	D	OS
- Ships from 1,001 to 3,000 gross tonnage	£170.00	D	OS
- Ships from 3,001 to 10,000 gross tonnage	£250.00	D	OS
- Ships from 10,001 to 20,000 gross tonnage	£325.00	D	OS
- Ships from 20,001 to 30,000 gross tonnage	£415.00	D	OS
- Ships over 30,000 gross tonnage	£480.00	D	OS
With the exception of:			
Vessels with the capacity to carry between 50 and 1,000 persons	£480.00	D	OS
Vessels with the capacity to carry more than 1,000 persons	£820.00	D	OS
Extension of existing Ship Sanitation Certificate	£95.00	D	OS
Vessel inspection following notification from another Competent Authority of conditions on board requiring further investigation	£95.00	D	OS

We propose to implement the Association of Port Health Authorities' (APHA) recommendations for port health authorities to take effect from 1 April 2024.

The fees are reviewed annually and will not be available until January 2024. <https://www.porthalthassociation.co.uk/>

ENVIRONMENTAL & PORT HEALTH

1.15 Port Health - Suffolk Coastal Port Health Authority (continued)

	2024/25	Fee Status	VAT Status
Water Sampling on vessels			
Standard Drinking Water Parameters – drinking water sampling for Coliforms, E.coli, and Enterococci are carried out on request			
Analytical testing using the standard drinking water parameters (first sample)	£107.49	D	OS
Analytical testing using the standard drinking water parameters (additional sample taken at the same time)	£53.75	D	OS
Fees subject to change pending UKHSA UK Health Security Agency published rates for 2024/25. <i>It is recommended that 3 samples are taken at different points in the vessels fresh water distribution system</i>			
Legionella - testing for Legionella can be carried out on request			
Sampling and analysis (first sample)	£150.56	D	OS
Sampling and analysis (additional sample taken at the same time)	£94.35	D	OS
<i>Please note: A single sample can only provide information as to the presence of legionella at an individual point on the ships water system. Therefore due to the nature of this organism and the associated risk one sample cannot provide assurances as to the legionella status of the vessels water distribution systems.</i>			
A survey consisting of numerous samples taking into account the vessel size, nature and layout of the water distribution systems would be needed to give an indication of a vessel's overall legionella status. Further advice and information can be provided on this if required.			

	2024/25	Fee Status	VAT Status
Other charges			
In addition to the charge that port health makes the Port of Felixstowe may also make other charges to produce your container for examination and for storing goods. Click here for a list of Port of Felixstowe charges.			
Hourly rate	£94.76	D	OS
Please be aware we charge a fee for postage of any document returns (where no courier is used).	£8.24	D	OS
Trailer Charge	£103.00	D	OS
Location Attendance charge	£51.50	D	OS
Late Submission Charge	£91.88	D	OS
Admin Charge for refund of payments made into Philis', Port Health Interactive Live Information System, account in error	£34.09	D	OS
Documents Checks completed on diverted consignments	£34.09	D	OS
Photocopy Charge	£6.18	D	OS

LEGAL & DEMOCRATIC SERVICES

2.1 Charges for licences

	2024/25	Fee Status	VAT Status
Sex Establishments			
Sex Establishments - Initial Grant	£2,358.00	D	OS
Sex Establishments - Annual Fee	£2,003.00	D	OS

	2024/25	Fee Status	VAT Status
Street Trading			
Consents and Licences	£438.00	D	OS
Daily Fee	£29.00	D	OS
Pavement Licences (for local businesses)	£0.00	D	OS

Single Event Street Trading Licence for events supported by Town/Parish Councils' are free of charge. This is at the Councils' discretion.

	2024/25	Fee Status	VAT Status
Boat and Boatman Licences			
Pleasure Boat Licence (up to 12 passengers)	£145.00	D	OS
Rowing Boat (4 passengers)	£72.00	D	OS

The Licensing Act 2003 governs a limited range of activities. These are the sale by retail of alcohol, the supply of alcohol in qualifying members clubs, the provision of regulated entertainment and the provision of late night refreshment between 11pm - 5am.

Any person making an application or giving a notice under the 2003 Act will be required to pay the fees and charges set by government. These fees are intended only to cover the cost of licensing authorities processing the Act.

LEGAL & DEMOCRATIC SERVICES

2.1 Charges for licences (continued)

Premises Licences / Club Premises Certificates

The fee bands in respect of applications for the below are based on the non-domestic rateable value of the premises.

Non-domestic Rateable Value		Initial Fee	Annual Charge	Fee Status	VAT Status
Village Halls, Church Halls and premises of a similar nature licensed only for the provision of regulated entertainment		No charge	No charge	ST	OS
Band A	£0 - £4,300	£100.00	£70.00	ST	OS
Band B	£4,301 - £33,000	£190.00	£180.00	ST	OS
Band C	£33,001 - £87,000	£315.00	£295.00	ST	OS
Band D	£87,001 - £125,000	£450.00	£320.00	ST	OS
Band E	£125,001 and over	£635.00	£350.00	ST	OS

License fee	2024/25	Fee Status	VAT Status
Personal Licences	£37.00	ST	OS
Temporary Event Notices	£21.00	ST	OS

LEGAL & DEMOCRATIC SERVICES

2.1 Charges for licences (continued)

Exceptionally Large Events

Where it is proposed that the number of people at any one time attending such an event, an additional fee may be charged.

Where a permanent premises licence is obtained for a site rather than one which is time limited for the event, the annual fee will require an additional charge at a rate of 50% of the additional fee.

Number of attendees	Additional Application Fee	Additional Annual Fee	Fee Status	VAT Status
5,000 - 9,999	£1,000.00	£500.00	ST	OS
10,000-14,999	£2,000.00	£1,000.00	ST	OS
15,000-19,999	£4,000.00	£2,000.00	ST	OS
20,000-29,999	£8,000.00	£4,000.00	ST	OS
30,000-39,999	£16,000.00	£8,000.00	ST	OS
40,000-49,999	£24,000.00	£12,000.00	ST	OS
50,000-59,999	£32,000.00	£16,000.00	ST	OS
60,000-69,999	£40,000.00	£20,000.00	ST	OS
70,000-79,999	£48,000.00	£24,000.00	ST	OS
80,000-89,999	£56,000.00	£28,000.00	ST	OS
90,000 and over	£64,000.00	£32,000.00	ST	OS

Other	2024/25	Fee Status	VAT Status
Supply of copy information contained in register	£5.00	ST	OS
Various notifications (change of address / copies of licence etc.)	£10.50	ST	OS
Notice of interest in any premises	£21.00	ST	OS
Application to vary or specify individual as premises supervisor	£23.00	ST	OS
Interim authority notice	£23.00	ST	OS
Application to transfer premises licence	£23.00	ST	OS

LEGAL & DEMOCRATIC SERVICES

2.1 Charges for licences (continued)

	2024/25	Fee Status	VAT Status
Small societies lotteries			
Initial registration fee	£40.00	ST	OS
Renewal (annually)	£20.00	ST	OS

	Licensed Premises Gaming Machine Permit	Club Gaming / Club Machine Permit (each)	Family Entertainment Centre Gaming Machine Permit	Prize Gaming Permit	Fee Status	VAT Status
Permits						
Grant	£150.00	£200.00	£300.00	£300.00	ST	OS
Grant (club premises certificate holder)	N/A	£100.00	N/A	N/A	ST	OS
	£100.00	£100.00	£100.00	£100.00	ST	OS
Existing operator grant						
Variation	£100.00	£100.00	N/A	N/A	ST	OS
Renewal	N/A	£200.00	£300.00	£300.00	ST	OS
Renewal (club premises certificate holder)	N/A	£100.00	N/A	N/A	ST	OS
Annual fee	£50.00	£50.00	N/A	N/A	ST	OS
Copy of permit	£15.00	£15.00	£15.00	£15.00	ST	OS
Transfer	£25.00	N/A	N/A	N/A	ST	OS
Change of name	£25.00	N/A	£25.00	£25.00	ST	OS
Notification of 2 machines	£50.00	N/A	N/A	N/A	ST	OS

LEGAL & DEMOCRATIC SERVICES

2.2 Hackney carriages / Private hire vehicles

	2024/25	Fee Status	VAT Status
Horse drawn vehicle	£52.00	D	OS
Disclosure & Barring Checks / Set by Disclosure & Barring Service	£38.00	D	OS
Vehicle ID plate initial charge (with bracket)	£28.00	D	OS
Vehicle ID plate renewal charges	£16.00	D	OS
Temporary vehicle	£52.00	D	OS
Vehicle transfer to new owner	£52.00	D	OS
Motorised Hackney Carriage	£351.00	D	OS
Discount for vehicles with mobility seat provision for people with disability	£175.00	D	OS
Discount for Electric/hybrid Vehicles	£263.00	D	OS
Private hire vehicles	£305.00	D	OS
Discount for vehicles with mobility seat provision for people with disability	£153.00	D	OS
Discount for Electric/hybrid Vehicles	£229.00	D	OS
Rickshaws	£52.00	D	OS
Discount for Electric/hybrid Rickshaws	£39.00	D	OS

Driver's Licences	2024/25	Fee Status	VAT Status
Initial application test	£52.00	D	OS
First application	£179.00	D	OS
Three year licence	£233.00	D	OS

LEGAL & DEMOCRATIC SERVICES

2.2 Hackney carriages / Private hire vehicles (continued)

Private Hire Operations Licences	2024/25	Fee Status	VAT Status
Knowledge Test	£60.00	D	OS
Five year licence owner/driver	£275.00	D	OS
Five year licence 2 - 5 cars	£464.00	D	OS
Five year licence over 5 cars	£915.00	D	OS

Additional Hackney / Private Hire Vehicle fees are set by East Suffolk Services Ltd from July 2023.

The Charges

Mechanical Inspection	**Single Axle Trailer - Inspection
Retest	**Failure to Keep Vehicle
Unfit Vehicle Notice	**Taxi / Private Hire Vehicle Plate Replacement
Double Axle Trailer - Inspection	

****Please contact (01502) 527100 or (01394) 444000 for more information.**

LEGAL & DEMOCRATIC SERVICES

2.3 Premises licences (Gambling Act 2005)

	Premises Licence Fee (New App.)	Premises Licence Fee (Annual Fee)	Misc. Fees (App. to Vary)	Misc. Fees (App. to Transfer)	Fee Status	VAT Status
Bingo Club	£1,769.00	£838.00	£1,180.00	£1,121.00	D	OS
Betting Premise (excluding tracks)	£1,769.00	£600.00	£1,180.00	£1,121.00	D	OS
Tracks	£1,769.00	£708.00	£1,180.00	£950.00	D	OS
Family Entertainment Centre	£1,769.00	£708.00	£1,000.00	£950.00	D	OS
Adult Gaming Centre	£1,769.00	£708.00	£1,000.00	£1,121.00	D	OS

DIGITAL & PROGRAMME MANAGEMENT

3.1 Street Name & Numbering

	2024/25	Fee Status	VAT Status
Existing			
Property renaming/addition of house name	£44.00	D	OS
Provision of naming & numbering information to utilities	£412.00	D	OS
Naming & numbering enquiries from solicitors/utilities not subscribed - new or historic addresses	£88.00	D	OS
Street Name Change	£340.00	D	OS
Addressing New Development			
1 plot	£44.00	D	OS
2-5 plots (including new streets)	£88.00	D	OS
6-10 plots (including new streets)	£170.00	D	OS
11-20 plots (including new streets)	£340.00	D	OS
21-50 plots (including new streets)	£896.00	D	OS
51-100 plots (including new streets)	£1,360.00	D	OS
101+ plots (including new streets)Base Charge	£1,360.00	D	OS
101+ plots (including new streets) per plot over 101	£11.00	D	OS
Re-numbering of scheme following development re-plan (after notification of approved naming and numbering scheme issued) either individuals or developers	Fee applicable as above	D	OS
Provision or relocation of street name plates			
Set of street nameplates (2) supplied and installed	£489.00	D	S
Re-locating street name plate	£170.00	D	S

OPERATIONS

4.1 Parking services (Off-street parking places)

Off-street parking places	Tariff			Season Tickets	Annual Tickets
VAT Status	S	S	S	S	S
	2 hours	4 hours	4+ hours	1 month	12 months
ALDEBURGH					
Fort Green	£1.50	£3.00	£4.00	£65.00	£350.00
King Street*	£1.50	£3.00		-	-
Oakley Square*	£1.50	£3.00	£4.00	-	-
Slaughden	£1.50	£3.00	£4.00	£65.00	£350.00
Slaughden Sea Wall	No Charge			-	-
Thorpeness Beach*	£1.00	£2.00	£4.00	£65.00	£350.00
Thorpe Road	£1.50	£3.00	£4.00	£65.00	£350.00
BECCLLES					
Blyburgate*	£1.00	£2.00	£4.00	£65.00	£350.00
Hungate*	£1.00	£2.00	-	-	-
Newgate*	£1.00	£2.00	-	-	-
BUNGAY					
Boyscott Lane	No Charge			-	-
Nethergate	£1.00	£2.00	£4.00	£65.00	£350.00
Priory Lane*	£1.00	£2.00	£4.00	£65.00	£350.00
Scales Street	£1.00	£2.00	£4.00	£65.00	£350.00
Wharton Street*	£1.00	£2.00	£4.00	£65.00	£350.00

OPERATIONS

4.1 Parking services (Off-street parking places) (continued)

Off-street parking places	Tariff			Season Tickets	Annual Tickets
	S	S	S	S	S
	2 hours	4 hours	4+ hours	1 month	12 months
FELIXSTOWE					
Arwela Road	£1.50	£3.00	£4.00	£65.00	£350.00
Beach Station	£1.50	£3.00	£4.00	£65.00	£350.00
Brackenbury Fort*	£1.50	£3.00	£4.00	£65.00	£350.00
Clifflands*	£1.50	£3.00	£4.00	£65.00	£350.00
Convalescent Hill*	£1.50	£3.00	£4.00	£65.00	£350.00
Crescent Road*	£1.50	£3.00	-	-	-
Felixstowe Pier*	£1.50	£3.00	£4.00	-	-
Garrison Lane	£1.50	£3.00	£4.00	£65.00	£350.00
Golf Road	£1.50	£3.00	£4.00	£65.00	£350.00
Highfield Road*	£1.50	£3.00	£4.00	£65.00	£350.00
Landguard *	£1.50	£3.00	£4.00	£65.00	£350.00
Manor Terrace*	£1.50	£3.00	£4.00	£65.00	£350.00
Martello Park North	£1.50	£3.00	£4.00	£65.00	£350.00
Martello Park South	£1.50	£3.00	£4.00	£65.00	£350.00
Nacton Shore	No charge			-	-
Ranelagh Road	£1.50	£3.00	£4.00	£65.00	£350.00

OPERATIONS

4.1 Parking services (Off-street parking places) (continued)

Off-street parking places	Tariff			Season Tickets	Annual Tickets
	S	S	S	S	S
	2 hours	4 hours	4+ hours	1 month	12 months
FELIXSTOWE					
Spa Pavilion	£1.50	£3.00	£4.00	-	-
The Grove	No Charge			-	-
The Promenade	£1.50	£3.00	£4.00	£65.00	£350.00
Undercliff	£1.50	£3.00	£4.00	-	-
FRAMLINGHAM					
Fore Street*	£1.00	£2.00	£4.00	£65.00	£350.00
Market Hill*	£1.00	-	-	-	-
HALESWORTH					
Angel Lane North*	£1.00	£2.00	£4.00	£65.00	£350.00
Angel Lane South*	£1.00	£2.00	£4.00	£65.00	£350.00
Bridge Street*	£1.00	£2.00	£4.00	£65.00	£350.00
Station Road*	£1.00	£2.00	£4.00	£65.00	£350.00
Thoroughfare*	£1.00	£2.00	-	-	-

OPERATIONS

4.1 Parking services (Off-street parking places) (continued)

Off-street parking places	Tariff			Season Tickets	Annual Tickets
VAT Status	S	S	S	S	S
	2 hours	4 hours	4+ hours	1 month	12 months
KIRKLEY					
All Saints	No Charge			-	-
Clifton Road*	£1.00	£2.00	£4.00	£65.00	£350.00
Pakefield Cliff	No charge			-	-
Pakefield Road*	£1.00	£2.00	£4.00	£65.00	£350.00
Pakefield Street*	£1.00	£2.00	£4.00	£65.00	£350.00
LEISTON					
High Street*	£1.00	£2.00	£4.00	£65.00	£350.00
Main Street	No Charge			-	-
Sizewell Beach*	£1.00	£2.00	£4.00	£65.00	£350.00
Sizewell Road*	£1.00	£2.00	£4.00	£65.00	£350.00
Valley Road	No charge			-	-
LOWESTOFT					
Adrian Road	£1.50	£3.00	£4.00	£65.00	£350.00
Alexandra Road	£1.50	£3.00	£4.00	£65.00	£350.00
Battery Green*	£1.50	£3.00	-	-	-
Belvedere Road	£1.50	£3.00	£4.00	£65.00	£350.00

OPERATIONS

4.1 Parking services (Off-street parking places) (continued)

Off-street parking places	Tariff			Season Tickets	Annual Tickets
	S	S	S	S	S
	2 hours	4 hours	4+ hours	1 month	12 months
LOWESTOFT					
Britten Centre*	£1.50	£3.00	£4.00	-	-
Christ Church	No Charge			-	-
Clapham Road*	£1.50	£3.00	-	-	-
Claremont Pier	£1.50	£3.00	£4.00	-	-
Kirkley Cliff*	£1.50	£3.00	£4.00	£65.00	£350.00
Regent Road	£1.50	£3.00	£4.00	£65.00	£350.00
Royal Green*	£1.50	£3.00	£4.00	£65.00	£350.00
St Peters Street*	£1.50	£3.00	£4.00	-	-
Tennyson Road*	£1.50	£3.00	£4.00	£65.00	£350.00
Waveney Sports Centre	No charge			-	-
Whapload Road	£1.50	£3.00	£4.00	£65.00	£350.00
MELTON					
Melton Riverside	No Charge			-	-
Melton Street	No Charge			-	-
OULTON BROAD					
Nicholas Everitts Park*	£1.00	£2.00	£4.00	£65.00	£350.00
The Boulevard	£1.00	£2.00	£4.00	£65.00	£350.00

OPERATIONS

4.1 Parking services (Off-street parking places) (continued)

Off-street parking places	Tariff			Season Tickets	Annual Tickets
	S	S	S	S	S
	2 hours	4 hours	4+ hours	1 month	12 months
SAXMUNDHAM					
Market Place*	£1.00	£2.00	£4.00	£65.00	£350.00
SOUTHWOLD					
Ferry Road (North)	No Charge			-	-
Ferry Road*	£1.50	£3.00	£4.00	£65.00	£350.00
Harbour Quay East*	£1.50	£3.00	£4.00	£65.00	£350.00
Harbour West	No Charge			-	-
Southwold Pier*	£1.50	£3.00	£4.00	£65.00	£350.00
WICKHAM MARKET					
Chapel Lane*	£1.00	-	-	-	-
The Hill*	£1.00	£2.00	-	-	-
The Percy Mason*	£1.00	£2.00	£4.00	£65.00	£350.00
WOODBIDGE					
Bawdsey Quay Picnic Site	No Charge			-	-
Deben	£1.00	£2.00	£4.00	£65.00	£350.00
Hamblin Road*	£1.00	£2.00	-	-	-

OPERATIONS

4.1 Parking services (Off-street parking places) (continued)

Off-street parking places	Tariff			Season Tickets	Annual Tickets
	S	S	S	S	S
	2 hours	4 hours	4+ hours	1 month	12 months
WOODBIDGE					
Iken Picnic Site	No Charge			-	-
Lime Kiln Quay	£1.00	£2.00	£4.00	£65.00	£350.00
Oak Lane*	£1.00	£2.00	-	-	-
Sutton Heath	No Charge			-	-
The Station*	£1.00	£2.00	£4.00	£65.00	£350.00
Theatre Street	£1.00	£2.00	£4.00	£65.00	£350.00
Upper Hollesley Common	No Charge			-	-
WRENTHAM					
Wrentham	No Charge			-	-

All above locations marked with an asterisk (*) have 30 minutes convenience concession free of charge.

All above locations with a £65 monthly ticket option also have an annual ticket option priced at £350.

Penalty Charge Notices (PCNs)

UK Statutory Instrument 2007 No. 3487 - The Civil Enforcement of Parking Contraventions (Guidelines on Levels of Charges) (England) Order 2007, Schedule to Article 2, Table 1, Band 2. Higher level penalty charge = £70 and lower level penalty charge = £50, discounted by 50% if paid within 14 days.

<http://www.legislation.gov.uk/uksi/2007/3487/schedule/made>

OPERATIONS

4.1 Parking services (Off-street parking places) (continued)

		2024/25	Fee Status	VAT Status
Resident Off Street Parking				
One year		£30.00	D	S
Health and social care permits	<i>Annual charge</i>	£8.00	D	S
Resident exemptions	<i>Annual charge. Standard rated unless linked to specific dwelling</i>	£50.00	D	S/OS
Trade dispensations		£10.00	D	S
Off-street parking place suspensions		£55.00	D	S
On-street parking place suspensions	<i>£55 for one day plus £25 per day thereafter, up to a maximum of ten days for £280</i>	£55.00	D	OS

4.2 Parking services (Administration charges)

		2024/25	Fee Status	VAT Status
Season Tickets - Issue		£25.00	D	OS
Permits - Issue		£25.00	D	OS
Replacement Season Ticket / Permit		£25.00	D	OS
Residents exemptions				
Exemption 1		£50.00	D	OS
Exemption 2		£75.00	D	OS
Exemption 3		£100.00	D	OS
Exemption 4		£125.00	D	OS
Exemption 5		£150.00	D	OS
Monthly and annual ticket changes		£30.00	D	OS
Resident Permit		£30.00	D	OS
<i>On-street parking place suspensions.</i>	<i>*£55 for one day plus £25 per day thereafter, up to a maximum of ten days for £280</i>	£55.00	D	OS
Trade dispensations: Per (7-day) week		£10.00	D	OS
Health and social care permits: Annual charge		£8.00	D	OS
Trade dispensations: Per (7-day) week		£10.00	D	OS

Administrative charges are standard rated when related to off-street parking and out of scope when related to on-street parking.

OPERATIONS

4.3 Collection of household waste

	2024/25	Fee Status	VAT Status
Bulky Household Waste			
For the collection of up to three single items of bulky household waste	£51.50	D	OS
Each additional item (above three items) of bulky household waste	£17.50	D	OS
Other/special collections (by quotation)	By quotation	D	OS
Garden Waste Collection (fortnightly)			
Garden Waste Service (per subscription, per annum)	£52.50	D	OS
Green bin delivery (required for new GW subscription)	£12.50	D	OS
Supply of new waste bin (single residual or recycling) - if permitted (refurbished - cost £25.00 if available only)	£39.50	D	OS
Supply of additional household waste bin (single residual or recycling) - if permitted	£39.50	D	OS
Developer bin delivery charge, if more than 6 bins - residual and recycling	£75.00	D	OS

4.4 Caravan & camping sites

	2024/25	Fee Status	VAT Status
Southwold Harbour Site			
Static Caravan - Site Fee (March - November)	£2,709.00	D	S
Static Caravan - Site Fee (December - February)	£235.75	D	S
New Caravan - Plot Fee	£2,163.00	D	S
Electric standing charge per annum + charge for actual usage (static sites)	£206.00	D	S

OPERATIONS

4.4 Caravan & camping sites (continued)

Additional Charges - Static Caravan	2024/25	Fee Status	VAT Status
Harbour side Supplement Front Line	£228.00	D	S
Blackshore Supplement Front Line	£199.75	D	S
<i>All below fees are charged on a per night basis</i>			
Tourers/Motorised Vans/Tents (Low Season) Inc 2 Adults	£35.75	D	S
Tourers/Motorised Vans/Tents (Peak Season) Inc 2 Adults	£42.00	D	S
Bank holiday weekend standard pitch	£43.25	D	S
Off peak electric hook up pitch	£40.90	D	S
Peak electric hook up pitch	£47.00	D	S
Bank holiday weekend electric hook up pitch	£48.25	D	S
Electricity per night	£5.15	D	S
Additional Adult	£4.80	D	S
Additional Child	£2.40	D	S
Additional OAP (65+)	£2.40	D	S
Awnings/Gazebos/Canopies	£8.80	D	S
Organised Groups (To be negotiated in advance)	By negotiation	D	S
Single backpacker (no vehicle)*	£17.00	D	S
Key Sale for Toilet Block	£30.40	D	S
Battery Charging	£10.25	D	S
Dryer Tokens	£2.50	D	S
* With discretion of caravan site manager at time of arrival			

OPERATIONS

4.5 Harbour & annual licences (beach & boat related)

	2024/25	Fee Status	VAT Status
Regular users (per annum)			
Mooring fees per vessel	£790.00	D	S
Tenders/Canoe/Kayak	£42.75	D	S
Harbour dues (per annum)			
Up to 20ft (6100mm)	£83.50	D	S
20ft (6100mm) up to 30ft (9150mm)	£159.25	D	S
30ft (9150mm) up to 40ft (12200mm)	£206.00	D	S
40ft (12200mm) up to 50ft (15250mm)	£268.45	D	S
Each additional ft (305mm) over 50ft (15250mm)	£7.30	D	S
Other charges (per annum)			
Large Hut Sites	£465.00	D	EX
Small Hut Sites	£318.00	D	EX
Stage sites (per annum)			
1E - 10E	£1,287.00	D	S
All other sites on Southwold Bank	£668.50	D	S
All other sites on Walberswick Bank	£668.50	D	S
W10 Mooring - Visitor Moorings (daily charges)			
Up to 20ft (6100mm)	£24.90	D	S
20ft (6100mm) up to 30ft (9150mm)	£29.45	D	S
30ft (9150mm) up to 40ft (12200mm)	£36.25	D	S
40ft (12200mm) up to 50ft (15250mm)	£45.30	D	S
Each additional ft (305mm) over 50ft (15250mm)	£2.35	D	S
Harbour Dues	£11.95	D	S
Electric Charge (Normal)	£5.65	D	S
Electric Charge (Heavy Use)	£20.60	D	S
Other charges			
Storage ashore per ft (305mm)	£3.25	D	S
Mooring winter charge per ft (305mm) per month	£4.60	D	S
Mooring berth on north dock wall (per vessel, per month)	£183.25	D	S

OPERATIONS

4.5 Harbour & annual licences (beach & boat related) (continued)

Licences	2024/25	Fee Status	VAT Status
Beach Licences			
- Aldeburgh and Felixstowe	£68.20	D	OS
- Sizewell	£54.60	D	OS
Sale of fish from Council land	Variable	D	OS
Boats on beach	£151.40	D	S
Boats in compound at The Dip	£151.40	D	S
Launch only permit	£73.65	D	OS
Fee for return of confiscated boats	Variable	D	S

OPERATIONS

4.6 Recreation areas & outdoor sports

Due to a recent HMRC decision surrounding VAT implications for public authorities providing leisure services, these fees are currently unavailable.

	2024/25	Fee Status	VAT Status
Beccles Sports Ground			
<i>Cricket</i>			
Adult one off match charge			
- Weekdays	£74.88	D	OS
- Weekdays (evenings)	£57.32	D	OS
- Weekends and Bank Holidays	£101.66	D	OS
Adult block booking (minimum 11 matches)			
- Weekdays	£64.38	D	OS*
- Weekdays (evenings)	£48.93	D	OS*
- Weekends and Bank Holidays	£94.66	D	OS*
Junior one off match charge			
- Weekdays	£50.32	D	OS
- Weekdays (evenings)	£40.84	D	OS
- Weekends and Bank Holidays	£74.11	D	OS
Junior block booking (minimum 11 matches)			
- Weekdays	£43.00	D	OS*
- Weekdays (evenings)	£35.95	D	OS*
- Weekends and Bank Holidays	£65.46	D	OS*
All weather surface			
- Weekdays	£53.82	D	OS
- Weekdays (evenings)	£37.08	D	OS
- Weekends and Bank Holidays	£60.31	D	OS
- Weekends and Bank Holidays (evenings)	£44.91	D	OS

OPERATIONS

4.6 Recreation areas & outdoor sports (continued)

Due to a recent HMRC decision surrounding VAT implications for public authorities providing leisure services, these fees are currently unavailable.

Beccles Sports Ground	2024/25	Fee Status	VAT Status
Football/Rugby			
Adult pitch - One off match charge			
- Weekdays	£53.82	D	OS
- Weekends and Bank Holidays	£70.56	D	OS
Adult pitch - Block booking (minimum 11 matches)			
- Weekdays	£44.34	D	OS*
- Weekends and Bank Holidays	£55.41	D	OS*
Junior pitch - One off match charge			
- Weekdays	£34.61	D	OS
- Weekends and Bank Holidays	£42.75	D	OS
Junior - Block booking (minimum 11 matches)			
- Weekdays	£20.55	D	OS*
- Weekends and Bank Holidays	£26.27	D	OS*
Mini Football Pitch (5-a-side)	£17.30	D	OS

OPERATIONS

4.6 Recreation areas & outdoor sports (continued)

Due to a recent HMRC decision surrounding VAT implications for public authorities

Dip Farm - Lowestoft	2024/25	Fee Status	VAT Status
Football			
Adult pitch - One off match charge			
- Weekdays	£53.82	D	OS
- Weekends and Bank Holidays	£70.56	D	OS
Adult pitch - Block booking (minimum 11 matches)			
- Weekdays	£44.34	D	OS*
- Weekends and Bank Holidays	£55.41	D	OS*
Junior pitch - One off match charge			
- Weekdays	£34.61	D	OS
- Weekends and Bank Holidays	£42.75	D	OS
Junior pitch - Block booking (minimum 11 matches)			
- Weekdays	£20.55	D	OS*
- Weekends and Bank Holidays	£26.27	D	OS*
Pavilion Hire	£80.86	D	OS

OPERATIONS

4.6 Recreation areas & outdoor sports (continued)

Eastward Ho and Walton Sports Ground - Felixstowe	2024/25	Fee Status	VAT Status
Football			
Adult pitch - One off match charge			
- Weekdays	£53.82	D	OS
- Weekends and Bank Holidays	£70.56	D	OS
Adult pitch - Block booking (minimum 8 matches)			
- Weekdays	£33.53	D	OS*
- Weekends and Bank Holidays	£50.32	D	OS*
Junior pitch - One off match charge			
- Weekdays	£34.61	D	OS
- Weekends and Bank Holidays	£42.75	D	OS
Junior pitch - Block booking (minimum 8 matches)			
- Weekdays	£24.46	D	OS*
- Weekends and Bank Holidays	£33.73	D	OS*
Changing Room Hires (without pitch)	£36.51	D	OS

OPERATIONS

4.6 Recreation areas & outdoor sports (continued)

Due to a recent HMRC decision surrounding VAT implications for public authorities providing leisure services,

	2024/25	Fee Status	VAT Status
Dellwood Avenue - Felixstowe			
Football			
Junior pitch - One off match charge			
- Weekdays	£34.61	D	OS
- Weekends and Bank Holidays	£42.75	D	OS
Junior pitch - Block booking (minimum 8 matches)			
- Weekdays	£24.46	D	OS*
- Weekends and Bank Holidays	£33.73	D	OS*
Mini soccer pitch x 5 (5-a-side)			
- One off	£26.27	D	OS
- Regular	£17.30	D	OS
Tennis			
Per Court (hourly rate)	£14.06	D	OS
Pavilion Hire			
	£80.86	D	OS

* Where a block booking meets all HMRC's criteria for block booking exemption, fees will be exempt. Otherwise these are outside the scope of VAT.

Coronation Sports Ground Felixstowe

Cricket

Not available to lease from the Council and its partners due to being leased to the Club directly.

Rugby

Not available to lease from the Council and its partners as from **July 2022 due to being leased to the Club directly.

*Where a block booking meets all HMRC's criteria for block booking exemption, fees will be Exempt. Otherwise they are Standard rated.

OPERATIONS

4.7 Leisure facilities

Brackenbury Leisure Centre, Deben Leisure Centre, Felixstowe Leisure Centre & Leiston Leisure Centre are managed by Places for People. For more information see below contact details:

Brackenbury Leisure Centre Felixstowe	01394 270278
Deben Leisure Centre Woodbridge	01394 388991
Felixstowe Leisure Centre Felixstowe	01394 694600
Leiston Leisure Centre Leiston	01728 832700

Water Lane Leisure Centre and Waveney Valley Leisure Centres are managed by Everyone Active. For more information see below contact details:

Waveney Valley Leisure Centre Bungay	01986 895014
Waterlane Leisure Centre Lowestoft	01502 532540

OPERATIONS

4.8 Beach huts & chalets

There is a variety of huts/chalets/hut sites for hire/licence/lease in the Council district, primarily at Lowestoft, Felixstowe, Sizewell and Southwold.

A premier site is defined as having no other beach hut in the direct line of sight towards the sea perpendicular to the front elevation of the beach hut. A standard site is one that have a hut immediately in front, obstructing the line of sight towards the sea.

	2024/25	Fee Status	VAT Status
Sizewell Beach Huts			
Premier site only	£688.80	D	S
Setting up of Beach Hut licence	£40.95	D	S
Administration fee for paying by instalments	£34.13	D	S

Southwold Beach Huts

The beach huts at Southwold are privately owned and positioned on sites leased from East Suffolk Council. (Please note there are currently no vacant sites available).

Beach hut hire - Some beach hut owners do provide short term lettings of their huts. For further information please contact the [Southwold Beach Hut Owners Association](#).

For Southwold hut site tenants who wish to claim a discount for being a local resident, please register with Asset Management every year. Discounts for membership of the Southwold Beach Hut Association will be directly verified with the Association at the time of invoice.

	2024/25	Fee Status	VAT Status
Lowestoft Beach Huts			
Privately owned beach huts at Pakefield (Pakefield Street) are positioned on sites leased from East Suffolk Council.			
Privately owned beach huts at Eastern Edge are positioned on sites leased from East Suffolk Council.			
Privately owned beach huts at Pakefield/Fisheries/Jubilee beach huts are positioned on sites licensed from East Suffolk Council	£624.75	D	S
(Waiting lists for annual hire beach huts/hut sites are currently closed to new entries).			
Beach hut hire			
You can access current fees and booking system via https://www.hirebeachhuts.co.uk/ or calling (01502) 586167.			
Bookings fees vary to the type of hut and time of year. Bookings may additionally qualify for discount - see website. Promotions may apply from time to time.			

OPERATIONS

4.8 Beach huts & chalets (continued)

Claremont and South Beach, beach huts (refurbished) - Hire prices	2024/25	Fee Status	VAT Status
Weekly general hire price per week (subject to qualifying discount/promotions)	£82.00	D	S
Weekly main season hire price per week	£175.00	D	S
Winter hire (period November to March)	£252.00	D	S
Annual licence (where available)	£806.40	D	S

Victoria two-storey building	2024/25	Fee Status	VAT Status
Weekly general hire price per week (subject to qualifying discount/promotions)	£66.00	D	S
Victoria small - Weekly general hire price per week (subject to qualifying discount/promotions)	£60.00	D	S
Weekly main season hire price per week	£144.00	D	S
Victoria small - Daily main season hire price per day	£36.00	D	S
Winter hire (period November to March)	£240.00	D	S
Victoria small - Winter hire (period November to March)	£216.00	D	S
Annual licence (where available)	£735.00	D	S

Eastern Edge beach huts including accessible huts

Weekly hire	Hut Style 1	Hut Style 2	Hut Style 3		
April, May & September	£100.00	£120.00	£150.00	D	S
June & July	£150.00	£170.00	£200.00	D	S
August	£200.00	£220.00	£250.00	D	S
October	£80.00	£100.00	£150.00	D	S
Winter hire period					
November to March	£500.00	£520.00	£550.00	D	S

Casual hire for 1-day £40 typical. Other promotional days/weekends or offers may apply. Contact lowestoft.beach@eastsoffolk.gov.uk Tel (01502) 586167. Subject to season. Community and Group Hire of larger double-space huts (double-size hut). Subject to purpose. Typically £55 per hire per day. Discount may apply subject to status. Contact lowestoft.beach@eastsoffolk.gov.uk

OPERATIONS

4.8 Beach huts & chalets (continued)

Felixstowe hut sites	2024/25	Fee Status	VAT Status
Setting up of Beach Hut licence	£727.65	D	S
Setting up of Beach Hut licence - transfer within family (must provide evidence)	£144.90	D	S
Administration fee for paying by instalments	£34.13	D	S
Premier site	£688.80	D	S
Premier surcharge (per sqm where the site exceeds 2.13m width x 2.43m depth)	£188.00	D	S
Standard site	£551.25	D	S
Standard surcharge (per sqm where the site exceeds 2.13m width x 2.43m depth)	£164.50	D	S

OPERATIONS

4.8 Beach huts & chalets (continued)

Felixstowe chalets	2024/25	Fee Status	VAT Status		
Bath Tap					
- Chalets 1 - 4, 9 - 20, 27 - 36 (26)	£2,401.35	D	S		
- Chalets 5 - 8 (4)	£1,862.70	D	S		
- Chalets 21 - 26 (6)	£1,862.70	D	S		
Cliff House					
- Chalets 1 and 2	£1,306.20	D	S		
- Chalets 3 and 4	£878.85	D	S		
- Chalet 5	£1,862.70	D	S		
- Chalets 18 - 25 (8)	£1,862.70	D	S		
- Chalets 26 - 41 (16)	£2,401.35	D	S		
Administration fee for paying by instalments	£34.13	D	S		
Setting up of chale	£40.95	D	S		
Seashore Village hut sites					
Privately owned beach huts at are positioned on sites leased from East Suffolk Council.					
March / April/ September / October	Single Unit	Single Unit with WC	Dual Unit with WC	D	S
May/ June	£150.00	£180.00	£250.00	D	S
July / August	£200.00	£230.00	£350.00	D	S
Selected Winter Weeks	£250.00	£280.00	£450.00	D	S
Other promotions, discounts or hire offers may apply	£175.00	£200.00	£275.00	D	S
Whole Building Hire Price - For Community and Group Hire, Price on application. Subject to availability and specific requirements					

OPERATIONS

4.9 Cemeteries

Interment charges are doubled for anyone not registered at the time of death as a resident of East Suffolk. However, if a resident has been required to move out of the area for medical care or to a nursing home within the last two years due to ill-health, a single fee would apply. Proof of previous residency and date of move would be required by the Cemeteries Office with the Notice of Interment. It is the responsibility of the family or Funeral Director to provide this information, failure to do so will result in the payment of double fees.

*Fees detailed below marked "**", are not applicable for grave spaces where Exclusive Right of Burial was purchased between 1st May 1995 and 1st April 2003*

	2024/25	Fee Status	VAT Status
Interments (first and subsequent) for Purchased Graves			
Stillborn child or aged under 18 years	No charge	D	OS
A person over age 18			
- Standard Depth	£844.60	D	OS
- Double Depth	£996.00	D	OS
- Treble Depth	£1,153.60	D	OS
For the interment of ashes in a grave or ashes plot	£261.60	D	OS
For the interment of two sets of ashes at the same time	£344.00	D	OS
For the scattering of ashes	£115.00	D	OS
For the interment of body parts to an existing gra	£209.10	D	OS
Interments (first and subsequent) for Common Graves / Unmarked Graves			
Stillborn child or aged under 18 ye	No charge	D	OS
A person over age 18			
- Standard Depth	£619.60	D	OS
- Double Depth	£722.60	D	OS
- Treble Depth	£917.20	D	OS
Cancellation of burial arrangements 48 hours prior to burial	50% of fee	D	OS
Cancellation of burial arrangements less the 48 hours prior to burial	100% of fee	D	OS
Exhumation			
- Of a body	£2,340.00	D	S
- Of cremated remains	£501.60	D	S

OPERATIONS

4.9 Cemeteries (continued)

Exclusive Right of Burial (Period of 25 years) - Excludes Common/Unpurchased graves	2024/25	Fee Status	VAT Status
For exclusive right of burial in an earthen grave space 9' x 4' (2743mm x 1219mm)	£1,659.40	D	OS
For exclusive right of burial in an earthen ashes plot 2' x 2' (609mm x 609mm)	£1,542.40	D	OS
For exclusive right of burial in a children's plot 5' x 2' (1524mm x 609mm)	No charge	D	OS
For exclusive right of burial in a children's plot 3' x 2' (914mm x 609mm)	No charge	D	OS
Extension of Exclusive Right of Burial for a Period of 10 years			
- In an earthen grave space 9' x 4' (2743mm x 1219mm)	£249.80	D	OS
- In an earthen	£166.90	D	OS

Monuments and Headstones (Memorials permitted on any section, including lawns)	2024/25	Fee Status	VAT Status
Headstones, crosses etc. (maximum height of 36"/920mm)*	£256.50	D	S
Headstones, crosses etc. (maximum height 24"/609mm)*	£145.50	D	S
Headstones, crosses etc. on gardens of rest ashes plots (maximum height 24"/609mm) Aldeburgh, Leiston & Saxmundham only	£150.00	D	S
A plaque or desk (maximum height 6"/152mm)*	£150.00	D	S
A plaque on memorial wall 9" x 6" (229mm x 152mm)	£256.50	D	S
Flower vase with inscription (maximum height 11 3/4"/300mm)*	£114.30	D	S
For every additional inscription	£64.65	D	S
Kerb Sets (Traditional Section only) - Excludes headstone fee			
For single grave space			
- Stillborn child or aged under 18 years (max length 24"/610mm)*	No charge	D	OS
- A full kerb set (max length 83"/2100mm)*	£284.30	D	S
- A half kerb set (length between 19" and 42"/480mm and 1050mm)*	£150.00	D	S
- A small kerb set (maximum length 19"/480mm)*	£114.30	D	S

OPERATIONS

4.9 Cemeteries (continued)

	2024/25	Fee Status	VAT Status
Kerb Sets (Traditional Section only) - Excludes headstone fee			
For double grave space			
- A full kerb set (max length 83"/2100mm)*	£568.00	D	S
- A half kerb set (length between 19" and 42"/480mm and 1050mm)*	£346.60	D	S
- A small kerb set (maximum length 19"/480mm)*	£264.20	D	S
All areas			
Memorial renovation/replacement/application	£53.60	D	S
	2024/25	Fee Status	VAT Status
Other charges			
Use of cemetery chapel	£200.85	D	EX
Appointment with cemetery staff	£54.10	D	S
Cemetery staff locating and marking grave	£54.10	D	S
Staff search of burial records (per register)	£54.10	D	S
Personal search of burial records (per register)	£29.60	D	S
For a certified copy of entry in register or burials	£29.60	D	S
Statutory declaration relating to burial records	£125.15	D	OS
Updating grants of exclusive rights of burial	£41.70	D	S
Transfer of grant of right of burial	£72.10	D	OS
Ash Collection	£50.00	D	
Reading	£75.00	D	

OPERATIONS

4.10 Green burials

Green Burial Site	2024/25	Fee Status	VAT Status
Interments (first and subsequent) burial fees			
Stillborn child or aged under 18 years	No charge	D	OS
A person over age 18 (single depth)	£601.50	D	OS
For the interment of ashes in a grave or ashes plot	£256.50	D	OS
For the interment of two sets of ashes at the same time	£334.25	D	OS
For the scattering of ashes	£115.00	D	OS
Provision of plaque on memorial board	£74.70	D	S

4.11 Sponsorship of Commemorative Benches

All fees are for a 10 year sponsorship period from the date on installation

	2024/25	Fee Status	VAT Status
Plaque* only	£155.00	D	OS
Plaque* and new standard bench	£1,498.65	D	OS
New base, standard bench and plaque*	£2,015.00	D	OS
Plaque* and new deluxe bench	£1,955.00	D	OS
New base, deluxe bench and plaque*	£2,425.00	D	OS
<i>*The plaque remains the property of the sponsor</i>			

OPERATIONS

4.12 Oulton Broad Yacht Station

	2024/25	Fee Status	VAT Status
Visitor moorings (per 24 hours)			
Stern on	£11.50	D	S
Side on	£18.00	D	S
Stern on with electric	£16.00	D	S
Side on with electric	£22.50	D	S
Side on with electric (over 45ft)	£30.00	D	S
Side on (over 45ft)	£25.00	D	S
Short stay (between 10am - 4pm)	£7.00	D	S
Buoys (per week)	£45.00	D	S
Buoys (per 24hrs)	£8.00	D	S
Showers	£2.50	D	S
Laundry (per wash)	£4.00	D	S
Tumble dryer (minimum charge)	£2.00	D	S
Water top up	£3.00	D	S
Contracted moorings (per annum)			
Piscatorial moorings	£226.00	D	S
Floating pontoon (secured)			
WOBYC (Squibs beam 6.13ft/WODs beam 6.01ft) up to 10 club members 10ft x 7ft pens (per ft)	£48.50	D	S
All other vessels (per ft)	£53.50	D	S
Annual moorings			
Trots (per ft)	£51.00	D	S
Buoys (per ft)	£41.00	D	S
Storage ashore - up to 10ft	£216.50	D	S
Storage ashore - every ft thereafter	£11.50	D	S
House boat (per ft)	£34.00	D	OS

OPERATIONS

4.13 Events Area

Set up / break down days i.e. non trading days are charged at 50% of the charge rates list below. Electricity charges are a flat rate of £15.00 per charging point per day. Commercial and national charities will incur an administrative charge and a commercial fee whilst local community and charity events will incur an administrative charge only.

Please note that there may be additional costs incurred for particular events, which will be calculated on a case by case basis. These can include (but are not constrained to):

Damage deposit (refundable if no damage occurs)

Licensing fees for the activities

Parking - Loss of income and or suspended parking due to event use

Waste management, grounds or toilets - Where additional services or provision arise

Event monitoring - In compliance with policy and location hire agreement

Highways - Road closure and signage costs (payable directly to Suffolk County Council)

Attendance and Site opening - Where out of hours arrangements apply

Small - Outdoor theatre, fundraising & music events (under 500 attendees, per day)	Commercial	Charity (national)	Charity (local**)	Fee Status	VAT Status
Application fee	£60.00	£60.00	£30.00	D	EX
Hire charge (per day)					
- Felixstowe Events Area	£360.00	£180.00	no charge	D	EX
- Parks, promenade, gardens and village greens	£360.00	£180.00	no charge	D	EX
- Felixstowe Triangle	£120.00	£60.00	no charge	D	EX
- Promotional stands (per metre)	£12.00	£6.00	no charge	D	EX
Medium - Circus, fun fair, music event, sports event & open air cinema (500 - 2999 attendees, per day)	Commercial	Charity (national)	Charity (local**)	Fee Status	VAT Status
Application fee	£60.00	£30.00	£30.00	D	EX
Hire charge (per day)					
- Events Area	£710.00	£355.00	no charge	D	EX
- Parks, promenade, gardens and village greens	£710.00	£355.00	no charge	D	EX
- Promotional stands (per metre)	£12.00	£6.00	no charge	D	EX

OPERATIONS

4.13 Events Area (continued)

Large - Carnival, art on prom, historic car rally, commercial launches, commercial shows, sports event (over 3000 attendees, per day)	Commercial	Charity (national)	Charity (local**)	Fee Status	VAT Status
Application fee	£120.00	£120.00	£60.00	D	EX
Hire charge (per day)					
- Events Area	£1,180.00	£590.00	no charge	D	EX
- Parks, promenade, gardens and village greens	£1,180.00	£590.00	no charge	D	EX
- Promotional stands (per metre)	£12.00	£6.00	no charge	D	EX

***A local charity is described as charity that is registered within Suffolk and/or operates within the East Suffolk district, providing a variety of goods, products or services that are needed to the local population.*

PLANNING & COASTAL MANAGEMENT

5.1 Section 106 Agreements (s106)

	2024/25	Fee Status	VAT Status
s106 Agreements			
Written confirmation of compliance with a Section 106 Agreement (Hourly rate)	£78.00	D	S
Planning obligation monitoring fee per obligation/trigger	£445.00	D	OS

5.2 First Homes Application Fees

	2024/25	Fee Status	VAT Status
First registration of plot and application processing (per plot)	£546.00	D	OS
Second and Subsequent applications on a previous First Home plot	£273.00	D	OS

5.3 Community Infrastructure Levy (CIL)

Further guidance and information on CIL, together with the relevant CIL Forms can be found on the [Planning Portal](#). For the CIL advice service, an email with details of the service you require should be sent to CIL@eastsoffolk.gov.uk for an estimate of the time involved. CIL advice fees should be paid up front.

	2024/25	Fee Status	VAT Status
CIL and s106 service			
Written CIL advice or guidance on following the CIL process including written estimations of CIL liability and CIL implications on development at pre-application stage. (Hourly rate)	£78.00	D	S
<i>Fees above are applicable from 1 January 2024 to 31 December 2024.</i>			
CIL and s106 service website			

5.4 Pre application planning advice

Pre application services and applicable fees are detailed in the Planning and Building Control Fees and Charges Document available at the [Pre-application advice service website](#). The website and fee document provides details of the fees and the process for obtaining the service and making payment. We continue to review our Pre-application advice services to deliver best value to the community.

5.5 Planning Applications and Planning Related Applications

The fees for Planning Applications (i.e. those seeking Planning Permission) and for Planning related applications (i.e. those seeking Prior Notification Approval, Listed Building Consent, Advertisement Consent, Discharge of conditions etc) are set by National Government through The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012, which have been amended more than once. The latest of which was through The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2023, which were made 8 November 2023 and came into force 6 December 2023.

The original version of the current fee regulations (the 2012 version) can be accessed via: <https://www.legislation.gov.uk/uksi/2012/2920/contents>

The latest (2023) amendment to the Regulations can be accessed via: <https://www.legislation.gov.uk/uksi/2023/1197/introduction/made>

The latest amendments to the Regulations included significant complex changes, not only increasing many of the fees by 25% or 35% but also included the insertion of additional fee thresholds linked to the total floorspace, site area or number of dwellings, with different payment levels are required per 75sqm (or part thereof) or per 0.1 hectare (or part thereof) or per dwelling unit for each threshold level. Therefore there is no direct correlation between financial years for the fee rate categories provided.

The 2023 amendments to the fee regulations also introduced a new process for future adjustments to the planning fees. They are to be indexed linked as of 1 April 2025, so they will likely increase year on year from that time. However, they will remain set nationally, and officers expect that the adjusted fees will be published annually on a national basis; the timings for those fees lists is unknown.

PLANNING & COASTAL MANAGEMENT

5.5 Planning Applications and Planning Related Applications (continued)

It should also be noted that through the 2023 changes to the Fee Regulations, the 'free go' will be disappearing. Prior to the 2023 amendment, a 'free go' was possible for a revised application on the same site area for the same form of development, if the new application is received within 12 months of the original application being received if it was withdrawn, or within 12 months of the decision if it was granted or refused. The changes to fee regulations make the 5 December 2023 a trigger date linked to the initial application, from which the timeframe for the submission of the second application will be measured in terms of potential for a 'free go'. This change will result in a reduction in the potential number of 'free go' applications over time. There can not be a precise date given for when the last 'free go' will be possible because it will be dependant upon when the last application received on 5 December 2023 is determined, as there will then be a 12 month window during which the applicants could be eligible for a 'free go'.

Officers have translated the above amended Regulations (i.e. the 2023 version) into an easier to follow format and inserted them as additional pages within the "East Suffolk Council Fees and Charges Document Planning and Building Control", which can be accessed via <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Applications/Planning-and-building-control-fees-and-charges.pdf>

5.6 Public path orders & agreements

Per application	2024/25	Fee Status	VAT Status
Hourly charge	£74.00	D	OS
Initial application fee	£500.00	D	OS
Advertising	actual cost	D	OS
Mapping (from Suffolk County Council)	actual cost	D	OS

PLANNING & COASTAL MANAGEMENT

5.7 Local land charges

	2024/25	Fee Status	VAT Status
Official Enquiries			
Full search	£169.44	D	S & OS
Full search additional parcel	£19.98	D	S
LLC1	£29.66	D	OS
LLC1 register part	£8.45	D	OS
LLC1 additional parcel	£4.61	D	OS
Full CON29R	£139.77	D	S
Con 29 additional parcel	£15.37	D	S
Con 29 additional question	£25.42	D	S
Con 29 R individual questions (each)	£3.61	D	S
Con 29 optional enquiry	£23.67	D	S
Personal search	£23.79	D	OS
Solicitor fees for retrieval of documents	£23.66	D	OS
Administration fee	£21.22	D	OS

5.8 Planning policy & delivery

All Local Plan/supporting documents for East Suffolk Council are available free of charge online - <http://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/>. Hard copies of documents are available on request. We will normally charge 20p per A4 sheet plus postage.

Hard copies of Policies Maps are also available on request and will be charged at the following price as per the size of map plus postage.

	2024/25	Fee Status	VAT Status
Per single one-sided sheet			
A0	£8.00	D	ZE
A1	£4.00	D	ZE

Please note: the price of postage will vary depending on the size/weight of the document(s).

Hard copies of any consultation documents produced will remain free of charge to the public who are unable to access them in other ways.

PLANNING & COASTAL MANAGEMENT

5.9 Ordnance Survey Extracts

Sale of publications for Building Control and Planning.

Copies of official documents (e.g. Planning and Building Regulations decision notice) - available via PUBLIC ACCESS

5.10 Community Infrastructure Levy (CIL)

The Community Infrastructure Levy is the way in which some councils collect financial contributions from developers to help pay for new and improved infrastructure. East Suffolk Council is the Charging Authority for the District excluding the area covered by the Broads Authority.

New residential development, including conversion/change of use to residential, householder extensions/outbuildings over 100 sqm and other types of development such as convenience retail may be liable to pay CIL. This can relate to full and reserved matters planning applications and Certificates of Lawfulness approved on or after 1 August 2013. This can also include permitted development (development which does not require submission of a planning application) which commences on or after 1 August 2013.

CIL is charged in pounds per square metre for qualifying development, in accordance with the provisions of the CIL Regulations 2010 (as amended).

The rates shown are those payable as from the 1st January and will be increased on the 1st January each year in line with the Building Cost Information Services All In Tender Price Index as published in November each year. Up to date rates and guidance can be found on East Suffolk Community Infrastructure Levy.

[East Suffolk Community Infrastructure Levy](#)

CIL is charged in pounds per square metre for qualifying development, in accordance with the provisions of the CIL Regulations 2010 (as amended).

The rates shown are those payable as from the 1st January and will be increased on the 1st January each year in line with the [RICS CIL Index](#) as published in November each year. Up to date rates and guidance can be found on [East Suffolk CIL Charging Schedule](#).

Relevant policies which affect CIL liabilities and methods of payment	2024/25	Fee Status	VAT Status
CIL Charging Schedule	Variable	ST	OS
Relevant policies which affect CIL liabilities and methods of payment			
CIL Instalments Policy	Variable	ST	OS
CIL Discretionary Social Housing Relief Policy	Variable	ST	OS

HOUSING

6.1 Houses of multiple occupancy licences

	2024/25	Fee Status	VAT Status
Properties with up to and including five lettable units	£760.00	D	OS
Extra charge for each unit over five	£26.00	D	OS
Relicensing fee (after five years) if no structural changes etc. to premises	£155.00	D	OS
Varying a current licence if no structural changes etc. to premise	No charge	D	OS

6.2 Enforcement notices on private sector landlords

	2024/25	Fee Status	VAT Status
Serving of Enforcement Notice	£550.00	D	OS

6.3 Immigration issues

	2024/25	Fee Status	VAT Status
Cost of inspections	£395.00	D	OS

HOUSING

6.4 Park home fees

	2024/25	Fee Status	VAT Status
New Licence (relevant protected sites only)			
<i>Processing</i>	0	D	
Examine application documentation, associated certificates. Check to ensure that details are correct and correct fee is attached (60 mins)	£62.50	D	OS
Make assessment of site layout, provision of amenities/utilities, examine fire risk assessment (60 mins)	£62.50	D	OS
Finance receive payment of fee, process payment and issue receipt (60 mins)	£62.50	D	OS
<i>Inspection</i>			
1-5 Verification inspection of the site (60 mins)	£62.50	D	OS
6-24 Verification inspection of the site (90 mins)	£93.75	D	OS
25-99 Verification inspection of the site (120 mins)	£125.00	D	OS
100+ Verification inspection of the site (180 mins)	£187.50	D	OS
<i>Issue of New Licence</i>			
Prepare licence documents and certificates (120 mins)	£125.00	D	OS
Check and sign certs/licence as necessary, and serve by post (30 mins)	£31.25	D	OS
Update database register and public register (20 mins)	£20.82	D	OS
1-5 Combined adjusted total fees for new park home licence applications	£427.07	D	OS
6-24 Combined adjusted total fees for new park home licence applications	£458.32	D	OS
25-99 Combined adjusted total fees for new park home licence applications	£489.57	D	OS
100+ Combined adjusted total fees for new park home licence applications	£552.07	D	OS
<i>Fit and Proper Persons Register Application</i>			
New application fee	£140.00	D	OS

HOUSING

6.4 Park home fees (continued)

Annual Fee (relevant protected sites only)

1-3 Number of pitches	No charge	D	OS
4-5 Number of pitches - (185 mins admin time) (140 mins inspection time)	£338.54	D	OS
6-24 Number of pitches - (200 mins admin time) (210 mins inspection time)	£427.09	D	OS
25-99 Number of pitches - (270 mins admin time) (390 mins inspection time)	£687.52	D	OS
100-199 Number of pitches - (375 mins admin time) (800 mins inspection time)	£1,223.99	D	OS
200+ Number of pitches - (450 mins admin time) (1080 mins inspection time)	£1,593.78	D	OS

	2024/25	Fee Status	VAT Status
Variations and Amendments			
License Variation (plus inspection fee if applicable)	£182.25	D	OS
Examine amended application documents and associated certificates. Check to ensure details are correct and correct fee is attached (60mins)	£62.50	D	OS
Check site history for any outstanding issues (30 mins)	£31.25	D	OS
Make decision as to whether amendments are appropriate (30 mins)	£31.25	D	OS
Prepare new licence documents (20 mins)	£20.82	D	OS
Check, sign and post new documents (15 mins)	£15.63	D	OS
Update database and public register (20 mins)	£20.82	D	OS
Site Inspection Fees			
1-5 Verification inspection of the site (60 mins)	£62.50	D	OS
6-24 Verification inspection of the site (90 mins)	£93.75	D	OS
25-99 Verification inspection of the site (120 mins)	£125.00	D	OS
100+ Verification inspection of the site (180 mins)	£187.50	D	OS

HOUSING

6.4 Park home fees (continued)

Licence Transfer fee

Transfer	£265.57	D	OS
Check form is correct including correct fee (30 mins)	£31.25	D	OS
Check site history and any outstanding issues (30 mins)	£31.25	D	OS
Examine request documentation and make decision (60 mins)	£62.50	D	OS
Prepare new licence documents (20 mins)	£20.82	D	OS
Check, sign and post new documents (15 mins)	£15.63	D	OS
Update database and public register (20 mins)	£20.82	D	OS
Deposit of site rules - examine rules, checking for banned rules (60 mins)	£62.50	D	OS
Deposit of site rules - update database and public register (20 mins)	£20.82	D	OS

HOUSING

6.5 Landlord smoke detectors

	2024/25	Fee Status	VAT Status
First offence	£660.00	D	OS
First offence (If paid within 14 day period from date of service)	£505.00	D	OS
Second offence	£2,500.00	D	OS
Third and subsequent offences	£5,000.00	D	OS

6.6 Enforcement action (works in default)

	2024/25	Fee Status	VAT Status
Cost of works undertaken	100%	D	OS
plus officer time costs	£62.50	D	OS

HOUSING

6.7 Civil penalties (Housing Act 2004)

	2024/25	Fee Status	VAT Status
Penalty maximum	£30,000.00	D	OS
<i>Actual penalty applied is calculated in accordance with the relevant policy</i>			

6.8 Minimum energy efficiency standards

	2024/25	Fee Status	VAT Status
Substandard property let unlawfully for less than three months	£2,000.00	D	OS
Substandard property let unlawfully for three months and over	£4,000.00	D	OS
Failure to comply with compliance notice	£2,000.00	D	OS
Registering a false exemption	£1,000.00	D	OS

6.9 Charges to Energy efficiency installers for provision of flex declaration

	2024/25	Fee Status	VAT Status
Fee for Production of an ECO4 declaration	£500.00	D	S
Reduced to £250 where the installed measures are below £2000			

HOUSING

6.10 Assistance service (Renovation Grants / Disabled Facilities Grants)

	2024/25	Fee Status	VAT Status
Assistance with making an application for a Renovation Grant (over £5,000.00). Includes tendering process and supervision of works	15% of eligible assistance package	D	S
Assistance with privately funded adaptation works. Includes tendering process and supervision of works	15% of eligible assistance package	D	S
Assistance with completing an application for a Grant (any type). Does not include tendering process and supervision of works	£155.00	D	S

6.11 Landlord references

	2024/25	Fee Status	VAT Status
Landlord Reference (Right to Buy Scheme)	No charge	D	S

6.12 Mutual exchange fees

	2024/25	Fee Status	VAT Status
Application			
Electric safety check	£98.94	D	S
Gas safety check - Boiler inspection	No charge	D	OS

HOUSING

6.13 Traveller site

	2024/25	Fee Status	VAT Status
Per week, per pitch			
Rent	£86.00	D	EX
Service charge	£10.10	D	EX

6.14 Garage rents

	2024/25	Fee Status	VAT Status
HRA Tenants (per week based on a 50 week year) *	£9.73	D	OS
Private Tenants (per week based on a 50 week year and inclusive of 20% VAT) *	£13.63	D	S
*2024/25 garage rents to be effective from 1st April 2024 proposed as part of the HRA budget report in February 2024			

6.15 Shared Ownership Fees

	2024/25	Fee Status	VAT Status
Transfer of Shared Ownership Approval	£200	D	
1.8	£100	D	
Home Improvements (Basic up to 5 requests)	£75	D	
Home Improvements complex	£150	D	
Deed of Variation	£500	D	

INTERNAL AUDIT

7.1 Access to personal files

	2024/25	Fee Status	VAT Status
Data Protection Act 1998 / General Data Protection Regulations	0.00	ST	OS
Housing Regulations 1989	0.00	ST	OS

ELECTORAL SERVICES

8.1 Sale of electoral roll

	2024/25		Fee Status	VAT Status
Per 1000 names (data)	£1.50		ST	OS
plus	£20.00	per order		
Per 1000 names (printed)	£5.00		ST	OS
plus	£10.00	per order		

9.1 Filming & Commercial Photography

2024/25

Fee
Status VAT
Status

Please contact [Screen Suffolk](#) if you wish to undertake any filming or commercial photography within the District.



CABINET
Tuesday, 02 January 2024

Subject	Southwold Harbour Management Committee – Fees and Charges 2024/25
Report by	Councillor Vince Langdon-Morris Cabinet Member with responsibility for Resources and Value for Money
Report Author and Head of Service	Kerry Blair Head of Operations Kerry.blair@eastsoffolk.gov.uk
Director	Andy Jarvis Strategic Director Andrew.jarvis@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:	Southwold

Purpose and high-level overview

Purpose of Report:

The purpose of this report is for the Southwold Harbour Management Committee (SHMC) to report to Cabinet the proposed schedule of Fees and Charges for 2024/25.

Options:

The reviewing and recommending of an annual schedule of charges and dues for the Harbour is a requirement under the Southwold Harbour Management Committee's Terms of Reference.

Recommendation:

That the annual schedule of charges and dues for Southwold Harbour, Southwold Caravan Site and Campsite for 2024/25 at **Appendix A** be approved.

Corporate Impact Assessment

Governance:

None arising directly from this report.

ESC policies and strategies that directly apply to the proposal:

East Suffolk Strategic Plan.

Environmental:

The SHMC must act in the best interests of the Port, which includes ensuring its long term sustainability and success. Environmental factors are taken into account in the decisions which the SHMC makes.

Equalities and Diversity:

An Equalities Impact Assessment (EqIA) has been prepared in respect of the fees and charges proposals in this report and no adverse impacts have been identified.

Financial:

The proposal is for the majority of fees and charges to be increased to assist with covering associated costs, but by a lower rate than CPI (which is the usual measure of inflation that the council applies). The average increase is in the region of 3%.

Human Resources:

None arising directly from this report.

ICT:

None arising directly from this report.

Legal:

None directly arising from this report.

Risk:

None arising directly from this report.

External Consultees:	The proposed changes were discussed at the Southwold Harbour Management Committee at its meeting on Thursday 9 November 2023.
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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 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 type="checkbox"/>	<input type="checkbox"/>
P09	Community Pride	<input type="checkbox"/>	<input checked="" 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"/>
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 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 wider representational base of the SHMC and the Advisory Group provides greater opportunities for engagement within our Communities and enables them to contribute to the running of an important local asset. The Governance arrangements support plans to			

develop or renovate the built environment of the Southwold Harbour Lands, to attract inward investment, maximise its economic development and support the delivery of infrastructure.

Background and Justification for Recommendation

1 Background facts	
1.1	The Terms of Reference of the Southwold Harbour Management Committee (SHMC) state that the Committee will review and then recommend an annual an annual schedule of charges and dues for the Harbour and these will be determined by the Cabinet.
2 Current position	
2.1	<p>East Suffolk Council will continue to encourage a commercial approach to setting fees and charges. Therefore, unless there are any statutory restrictions on setting a particular fee or charge, the principles listed below should be followed for the review of fees and charges for 2024/25:</p> <ul style="list-style-type: none"> • Where only the full cost of service provision can be charged, the fee or charge should reflect the full cost, including an apportionment of support service costs. • Where the discretionary fee or charge can be set at the market rate, these should be benchmarked and set at the appropriate rate considering demand for the service but ensuring that any competitive advantage is neutralised if in competition with the private sector. • Review opportunities to introduce new fees for discretionary services we are currently providing free of charge. • Undertake market research to identify chargeable services that our customers really want. • Consider whether the fee change will encourage or discourage the use of the services.
2.2	The proposed date for introducing the fees and charges is from 01 April 2024. All fees and charges are discretionary for the Harbour and the Caravan Site and Campsite.
2.3	<p>The Southwold Harbour Committee met on 9 November 2023, a copy of the report can be found at Appendix A. The Committee was advised that the approach to reviewing the fees and charges had been to apply a rate of 6.7%, which was the rate of inflation for the Consumer Price Index in September 2023. This had applied across the board to fees and charges. The Council also considered similar sites to benchmark the fees and charges.</p> <p>The Head of Operations recognised that this rise did follow on from high inflation in 2022 which was passed on in the 23/24 fees and charges. This would be challenging for businesses, but if the Council was going to make investments in the harbour infrastructure and amenities, then some of these costs needed to be offset.</p>

	<p>Members of the Committee voiced concerns in relation to the proposed increase on the basis of the condition and limited amenities currently available in the area of the harbour lands.</p> <p>Following further review, the recommendation from Southwold Harbour Management Committee is to apply a 3% increase across the board.</p>
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3 How to address current situation

3.1	The 2024/25 proposed charges and dues for Southwold Harbour, Southwold Caravan Site and Campsite are provided in Appendix B.
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4 Reason/s for recommendation

4.1	To fulfil both the Cabinet's and the Southwold Harbour Management Committee's responsibilities in respect of recommending an annual schedule of fees and charges for the forthcoming year.
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Appendices

Appendices:

Appendix A	HMC Report
Appendix B	Schedule of Charges 2024/25

Background reference papers:

None.



SOUTHWOLD HARBOUR MANAGEMENT COMMITTEE
Thursday, 09 November 2023

Subject	Fee Structure at Southwold Harbour and Southwold Caravan & Campsite
Supporting Officer	Kerry Blair Head of Operations Kerry.blair@eastsoffolk.gov.uk James Milnes Southwold Caravan and Harbour Manager James.milnes@eastsoffolk.gov.uk

Is the report Open or Exempt?	OPEN
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Wards Affected:	Southwold
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[Officer guidance for completion of report template](#)

Purpose and high-level overview

Purpose of Report:

This report recommends and seeks the Committee's views on a schedule of charges and dues for the Harbour, and the fees and charges for the Campsite and Caravan Site for 2024/25. Ensuring that the proposed price increases are competitive and in line with market standards.

Recommendation/s:

1. That having commented upon the proposed annual schedule of charges and dues for the Harbour 2024/25 and the proposed fees and charges for the Caravan Site 2024/25, attached at Appendix A, these be recommended to Cabinet for approval.

Impact Assessment

Governance:

None directly arising from this report.

Environmental:

No direct environmental impact arising from this report.

Equalities and Diversity:

Price adjustments have been made with considerations to equality, ensuring affordability and accessibility for diverse user groups.

Financial:

The proposed price increase aligns with the RPI at 6.7%, ensuring financial sustainability and profitability for the Harbour and Campsite.

Legal:

None directly arising from this report.

Risk:

Potential for initial customer resistance, mitigated by ensuring transparency in communicating the reasons for the increase.

Harbour Business Plan Priorities

To be added when the plan is in place.

East Suffolk Council Strategic Plan Priorities

Select the themes of the Strategic Plan which are supported by this proposal:		
T01	Growing our Economy	<input checked="" type="checkbox"/>
T02	Enabling our Communities	<input checked="" type="checkbox"/>
T03	Maintaining Financial Sustainability	<input checked="" type="checkbox"/>
T04	Delivering Digital Transformation	<input type="checkbox"/>
T05	Caring for our Environment	<input checked="" type="checkbox"/>

Background and Justification for Recommendation

1 Background facts	
1.1	The Terms of Reference of the Harbour Management Committee state that the Committee will review and then recommend an annual schedule of charges and dues for the Harbour and these will be determined by the Cabinet.

2 Current position	
2.1	<p>East Suffolk Council will continue to encourage a commercial approach to setting fees and charges. Therefore, unless there are any statutory restrictions on setting a particular fee or charge, the principles listed below should be followed for the review of fees and charges for 2024/25:</p> <ul style="list-style-type: none">• An expectation to achieve an increase of 6.7% (note: Consumer Price Index (CPI) inflation for September 2023 was 6.7%).• Where only the full cost of service provision can be charged, the fee or charge should reflect the full cost, including an apportionment of support service costs.• Where the discretionary fee or charge can be set at the market rate, these should be benchmarked and set at the appropriate rate considering demand for the service but ensuring that any competitive advantage is neutralised if in competition with the private sector.• Review opportunities to introduce new fees for discretionary services we are currently providing free of charge.• Undertake market research to identify chargeable services that our customers really want.• Consider whether the fee change will encourage or discourage the use of the services.
2.2	The proposed date for introducing the fees and charges is from 1 April 2024.

3 How to address current situation	
3.1	The 2024/25 proposed Harbour fees and dues and charges for the Campsite and Caravan Site are provided in Appendix A.
3.2	The Appendices include current year charges as a comparative and all charges quoted are inclusive of VAT where applicable.
3.3	The 2024/25 proposed fees and charges for the Harbour, the Campsite and the Caravan Site will be determined by Cabinet at its meeting on XX January 2024.

4 Reason/s for recommendation	
4.1	To fulfil the Committee's responsibilities in respect of recommending fees and charges.

Appendices

Appendices:	
Appendix A	Proposed Fees Structure For 2024

Background reference papers:	
None.	

4.4 Caravan & camping sites

	2024/25	Fee Status	VAT Status	£ Increase or (Decrease)	% Increase or (Decrease)	2023/24
Southwold Harbour Site						
Static Caravan - Site Fee (March - November)	£2,709.00	D	S	£79.00	3.00%	£2,630.00
Static Caravan - Site Fee (December - February)	£235.75	D	S	£6.75	2.95%	£229.00
New Caravan - Plot Fe	£2,163.00	D	S	£63.00	3.00%	£2,100.00
Electric standing charge per annum + charge for actual usage (static sites)	£206.00	D	S	£6.00	3.00%	£200.00

4.4 Caravan & camping sites (contin

	2024/25	Fee Status	VAT Status	£ Increase or (Decrease)	% Increase or (Decrease)	2023/24
Additional Charges - Static Caravan						
Harbour side Supplement Front Line	£228.00	D	S	£6.50	2.93%	£221.50
Blackshore Supplement Front Line	£199.75	D	S	£5.75	2.96%	£194.00
All below fees are charged on a per night ba						
Tourers/Motorised Vans/Tents (Low Season) Inc 2 Adult	£35.75	D	S	£1.05	3.03%	£34.70
Tourers/Motorised Vans/Tents (Peak Season) Inc 2 Adul	£42.00	D	S	£1.25	3.07%	£40.75
Bank holiday weekend standard pitch	£43.25	D	S	£1.25	2.98%	£42.00
Off peak electric hook up pitch	£40.90	D	S	£1.15	2.89%	£39.75
Peak electric hook up pitch	£47.00	D	S	£1.25	2.73%	£45.75
Bank holiday weekend electric hook up pitch	£48.25	D	S	£1.25	2.66%	£47.00
Electricity per night	£5.15	D	S	£0.15	3.00%	£5.00
Additional Adult	£4.80	D	S	£0.10	2.13%	£4.70

Additional Child	£2.40	D	S	£0.05	2.13%	£2.35
Additional OAP (65+)	£2.40	D	S	£0.05	2.13%	£2.35
Awnings/Gazebos/Canopies	£8.80	D	S	£0.25	2.92%	£8.55
Organised Groups (To be negotiated in advance)	By negotiation	D	S			
Single backpacker (no vehicle) * With discretion of caravans	£17.00	D	S	£0.50	3.03%	£16.50
Key Sale for Toilet Block	£30.40	D	S	£0.90	3.05%	£29.50
Battery Charging	£10.25	D	S	£0.25	2.50%	£10.00
Dryer Tokens	£2.50	D	S	**New**	**New**	

4.5 Harbour & annual licences (beach & boat related)

	2024/25	Fee Status	VAT Status	£ Increase or (Decrease)	% Increase or (Decrease)	2023/24
Regular users (per annum)						
Mooring fees per vessel	£790.00	D	S	£23.50	3.07%	£766.50
Tenders/Canoe/Kayak	£42.75	D	S	£1.25	3.01%	£41.50
Tenders/Canoe/Kayak Day Rate	£5.40	D	S	£0.15	2.86%	£5.25
Harbour dues (per annum)						
Up to 20ft (6100mm)	£83.50	D	S	£2.50	3.09%	£81.00
20ft (6100mm) up to 30ft (9150mm)	£159.25	D	S	£4.55	2.94%	£154.70
30ft (9150mm) up to 40ft (12200mm)	£206.00	D	S	£6.00	3.00%	£200.00
40ft (12200mm) up to 50ft (15250mm)	£268.45	D	S	£8.05	3.09%	£260.40
Each additional ft (305mm) over 50ft (15250mm)	£7.30	D	S	£0.20	2.82%	£7.10
Other charges (per annum)						
Large Hut Sites	£465.00	D	EX	£13.50	2.99%	£451.50
Small Hut Sites	£318.00	D	EX	£9.30	3.01%	£308.70
Stage sites (per annum)						

1E - 10E	£1,287.00	D	S	£37.50	3.00%	£1,249.50
All other sites on Southwold Bank	£668.50	D	S	£19.60	3.02%	£648.90
All other sites on Walberswick Bank	£668.50	D	S	£19.60	3.02%	£648.90
				£	%	
				Increase	Increase	
				or	or	
				(Decrease	(Decrease	
))	
W10 Mooring - Visitor Moorings (daily charges)						2023/24
Up to 20ft (6100mm)	£24.90	D	S	£0.70	2.89%	£24.20
20ft (6100mm) up to 30ft (9150mm)	£29.45	D	S	£0.85	2.97%	£28.60
30ft (9150mm) up to 40ft (12200mm)	£36.25	D	S	£1.05	2.98%	£35.20
40ft (12200mm) up to 50ft (15250mm)	£45.30	D	S	£1.30	2.95%	£44.00
Each additional ft (305mm) over 50ft (15250mm)	£2.35	D	S	£0.05	2.17%	£2.30
Harbour Dues	£11.95	D	S	£0.35	3.02%	£11.60
Electric Charge (Normal)	£5.65	D	S	£0.15	2.73%	£5.50
Electric Charge (Heavy Use)	£20.60	D	S	£0.60	3.00%	£20.00
Other charges						
Storage ashore per ft (305mm)	£3.25	D	S	£0.10	3.17%	£3.15
Mooring winter charge per ft (305mm) per month	£4.60	D	S	£0.10	2.22%	£4.50
Mooring berth on north dock wall (per vessel, per month)	£183.25	D	S	£5.25	2.95%	£178.00
Licences						
Beach Licences						
- Aldeburgh and Felixstowe	£68.20	D	OS	£2.00	3.02%	£66.20
- Sizewell	£54.60	D	OS	£1.60	3.02%	£53.00
Sale of fish from Council land	Variable	D	OS			Variable
Boats on beach	£151.40	D	S	£4.40	2.99%	£147.00
Boats in compound at The Dip	£151.40	D	S	£4.40	2.99%	£147.00
Launch only permit	£73.65	D	OS	£2.15	3.01%	£71.50
Fee for return of confiscated boats	Variable	D	S			Variable



CABINET
Tuesday, 02 January 2024

Subject	General Fund Budget 2024/25 and Medium Term Financial Strategy (MTFS)
Cabinet Member	Councillor Vince Langdon-Morris with responsibility for Resources and Value for Money
Report Author(s)	Lorraine Rogers Chief Finance Officer and Section 151 Officer Lorraine.rogers@eastsoffolk.gov.uk Georgina Peck Finance Business Partner/Acting Finance Planning Manager Georgina.peck@eastsoffolk.gov.uk Danielle Patterson Finance Business Partner/Acting Finance Planning Manager Danielle.patterson@eastsoffolk.gov.uk
Head of Service	Lorraine Rogers Chief Finance Officer and Section 151 Officer Lorraine.rogers@eastsoffolk.gov.uk
Director	Chris Bally Chief Executive 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:

This report sets out a further update to the draft Medium Term Financial Strategy (MTFS), taking account of new and revised risks, and presents an initial draft of the Council's General Fund Budget for 2024/25.

At the end of the 2024/25 budget process, the Council is required to approve a balanced budget for the following financial year and set the Band D rate of Council Tax.

The report brings together relevant information to enable Cabinet to review, consider, and comment upon the Council's General Fund revenue budgets before making recommendations to Council on 21 February 2024. This report also forms the basis of Scrutiny Committee's review of the Budget at its meeting on 18 January 2024 as required under the Budget and Policy Framework.

Options:

The consideration of the MTFS by Members at an early stage of the budget process is essential, especially in order to commence actions to achieve a balanced budget and sustainable medium-term position. Setting a balanced budget for the coming year is a statutory requirement, therefore no other options are considered appropriate.

Recommendation/s:

Cabinet is recommended to:

1. Approve the draft Medium Term Financial Strategy attached as **Appendix A**, including the draft 2024/25 General Fund Revenue Budget summarised in **Appendix A5** for review and consideration by the Scrutiny Committee as part of the budget process.
2. Approve an initial proposed Band D Council Tax for East Suffolk Council of £186.57 for 2024/25, an increase of £5.40 or 2.98%.

Corporate Impact Assessment

Governance:

The draft MTFS provides the framework for initial detailed budget discussions for the forthcoming financial year. This builds towards securing a balanced budget for 2024/25 which will be considered by Full Council at its meeting on 21 February 2024. Prior to the Full Council meeting in February, the budget will be considered at the following meetings;

- Cabinet 2 January 2024
- Scrutiny Committee 18 January 2024
- Cabinet 7 February 2024

ESC policies and strategies that directly apply to the proposal:

- Our Direction 2028
- East Suffolk Medium Term Financial Strategy
- Capital Programme
- Housing Revenue Account

- East Suffolk Treasury Management Strategy and Treasury Management Policy
- Annual Governance Statement
- Finance Procedure Rules
- Financial Management Code

Environmental:

There are no environmental impacts related to this report.

Equalities and Diversity:

An Equality Impact Assessment is not applicable at this stage of the draft MTFS. The purpose of this report is to provide Members with an update on the MTFS as of November 2023. This assessment will be completed on the finalisation of the budget for approval in February 2024 and the results taken into consideration.

Financial:

Detailed financial analysis and commentary is included in **Appendix A**.

Human Resources:

There are no HR implications directly arising from this report.

ICT:

There are no ICT implications identified.

Legal:

Section 25 of the Local Government Act 2003 places a personal duty on an authority's "Chief Financial Officer" to make a report to Council about the robustness of the estimates made for the purposes of the Council Tax calculations and the adequacy of financial reserves and balances.

The provisions of the Local Government Finance Act 1992 set out what the Council has to base its budget calculations upon and require the Council to set a balance budget with regard to the advice of its Section 151 Officer.

Risk:

Part of the process of delivering a robust medium-term strategy to enable the Council to manage its affairs soundly, is to have regard to both external and internal risks, and to identify actions to mitigate those risks. MTFS key principles and a risk analysis together with mitigating actions are provided in **Appendix A1**.

External Consultees:

Budget-related consultation questions now form a standing part of the permanent residents survey which is live via the Council's website. A summary of responses will be reported to Scrutiny Committee in January and Cabinet in February as part of their further consideration of the draft budget.

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"/>
<p>How does this proposal support the priorities selected?</p> <p>By ensuring the robustness of the Medium-Term Financial Strategy and adequate reserves and balances for the Council. The MTFs underpins and supports the delivery of the strategic direction of East Suffolk.</p> <p>The report forms an important element of good governance, ensure financial sustainability and putting the Council's assets to good use. It highlights areas of financial risk which will impact on the Council's Medium Term Financial Strategy (MTFS).</p>			

Background and Justification for Recommendation

1 Background facts	
1.1	The MTFS sets the strategic financial direction for the Council. It sets out the key financial management principles, budget assumptions and service issues.
1.2	<p>The MTFS provides a framework for the detailed budget setting process to ensure that resources are managed effectively and are able to deliver the aspirations of the Council as set out in the Strategic Plan. It provides a sound basis for planning and decision making, and is reviewed and updated at the following key points in the year:</p> <ul style="list-style-type: none"> • November/December – as a framework for initial detailed budget discussions for the forthcoming financial year. • January – an update to include additional information received at a national level and corporate issues identified through service planning and the detailed budget build. • February – with the final budget for the new financial year.
1.3	<p>The key underlying principles of the MTFS are:</p> <ul style="list-style-type: none"> • securing a balanced budget with reduced reliance on the use of reserves and general balances to support its everyday spending; • setting modest increases in Council Tax when appropriate; and • delivering service efficiencies and generating additional income where there are opportunities to do so.

2 Current position	
2.1	<p>Economic Outlook: The national economic background affects the costs the Council incurs, the funding it receives, and the demand for services as residents are affected by economic circumstances.</p>
2.2	The twelve-month Consumer Price Index (CPI) inflation to October 2023 was 4.6%, down from 6.7% in September. For local government, the September CPI is important because it will be used to index the business rates multiplier, and to uplift Revenue Support Grant (RSG) and the baselines within the Business Rates Retention System (BRRS). The Bank of England projects CPI inflation to fall to around 4.5% by the end of year and to continue to fall towards its target of 2% next year.
2.3	At its meeting on 13 December 2023, the Bank of England’s Monetary Policy Committee (MPC) voted by a majority of 6-3 to maintain the Bank Rate at 5.25%. Three members of the Committee preferred an increase of 0.25% to 5.5%. The next meeting of the MPC to review the bank rate is 31 January 2024.
2.4	<p>Local Government Finance: Following the Autumn Statement, concern over the financial sustainability of many councils across the country continues to be highlighted. Government funding for councils has increased in recent years, but a combination of high inflation and rising demand for services places unprecedented pressure on local authority budgets.</p>

	Longer-term funding certainty is required, alongside promised reform of the funding system which has been delayed for several years now.
2.5	On 22 November 2023 the Chancellor held the Autumn Statement 2023. No new funding was announced for local authorities, and the outlook for local government spending reviews continues to look very tight, with pressure on the public sector to achieve 0.5% annual productivity improvements.
2.6	On 5 December 2023 DLUHC published a Local Government Finance Policy Statement 2024/25, Appendix B . This set out and the government's intention for the local Government Finance Settlement for 2024/25 covering Business Rates, Council Tax, and settlement grants. Minimal changes to settlement funding have been made in the MTFs following this statement - recognising a further year of New Homes Bonus and the uplift of the Revenue Support Grant in line with September CPI. It is noted in the Policy Statement that in recognition of pressures across the sector, all authorities will see at least 3% increase in their Core Spending Powers before any decision on organisation efficiencies, use of reserves, and council tax levels, through the Funding Guarantee.
2.7	The provisional settlement was announced on 18 December and further detail is provided in Appendix C . Due to the timing of the release of the provisional settlement and the publication of this report, the MTFs figures will be updated in readiness for the Scrutiny Committee meeting on 18 January 2024. The most significant change from the February 2023 position is New Homes Bonus for another year, of £0.651m (this is captured in the report). Other settlement grants have either increased or decreased, but the overall position for the Council remains relatively unchanged financially, with only an additional £16,800 of funding compared to the original budget for next year.
2.8	Business Rates: In October all Suffolk councils agreed to continue a pooling arrangement for 2024/25, which would allow them to retain a larger proportion of their share of growth by reducing the overall levy rate for Suffolk to £nil. Suffolk County Council is the administering authority for the Pool and collates the NNDR1 returns of all of the Suffolk authorities. The MTFs update includes a Pooling Benefit estimate for 2024/25 of £4.6m. This will be reviewed later in the budget process and following the completion of the NNDR1 return for 2024/25 in January. The MTFs includes a reducing amount for Pooling Benefit beyond 2025/26, reflecting uncertainty in the system going forward.
2.9	The MTFs assumption is that the Council will continue to retain 100% Business Rates income from Renewables.
2.10	Business Rates income for 2024/25 is based on the NNDR1 return. All Business Rates estimates included in the MTFs will be updated following the completion of the return at the end of January 2024. This will include the split between Section 31 Grant and actual rates income.
2.11	Council Tax: Council Tax is one of the Council's most important and stable income streams, funding approximately 40% of the net budget requirement of the Council.
2.12	The increase in the tax base for East Suffolk is currently estimated to be 677.81 (0.75%) Band D equivalent properties, increasing the overall tax base for East Suffolk from 90,340.92 to 91,018.73 for 2024/25. This equates to around £0.123m of additional Council Tax income to the Council based on the current District Band D Council Tax of £181.17. The 2024/25 Council Tax Base was reported to Cabinet on 5 December 2023.

2.13	The 2024/25 provisional settlement confirms a council tax referendum principle for shire district councils of up to 2.99% or £5, whichever is higher. Assuming an increase of up to the referendum principle for 2024/25, would equate to a District Band D Council Tax for East Suffolk of £186.57, an increase of £5.40 or 2.98%. It would generate approximately £0.492m of additional income for East Suffolk. Total income to the Council from Council Tax would be £16.982m.
2.14	Council Tax Premium on Second Homes - The Levelling-up and Regeneration Bill received Royal Assent at the end of October 2023 which included giving billing authorities the discretion to charge a 100% premium on second homes or empty dwellings. It gives billing authorities the power to charge a 100% premium on “dwellings occupied periodically”. At its meeting on 25 January 2023, Full Council approve this in principle, subject to the Bill receiving Royal Assent. In order to implement the premium, a clear 12 month period and a full financial year’s notice is required. Therefore the earliest a Second Home Premium could be charged is the 1 April 2025. Although the Act has been passed the categories of properties exempted from the second home premium have not yet been disclosed and regulation is being awaited. Given the number of second homes in Suffolk, this 100% council tax premium should represent a significant addition to the income stream from Council Tax. It is estimated that this could generate in the region of £8m in East Suffolk - £6.2m for Suffolk County Council, over £1m for Suffolk Police, and £0.700m for East Suffolk Council. The current MTFS does not yet take account of this potential additional income for East Suffolk Council.
2.15	MTFS Forecasts 2024/25 to 2027/28: The budget continues to be reviewed and the following key areas of the budget are yet to be finalised which could lead to significant movements on the budgets; <ul style="list-style-type: none"> • East Suffolk Services Ltd (ESSL) • Business rates income • Announcement of the Local Government Settlement for 2024/25 • Use of reserves.
2.16	In the Budget report to Full Council in February 2023 the MTFS reported an annual General Fund budget gap for 2024/25 of £3.511m and rising to £6.405m by 2026/27. The current update forecasts this annual gap falling to £2.211m in 2024/25 and rising to £7.664m by 2027/28. Further details are provided in Appendix A4 . Cost pressures are mainly being driven by pay awards and inflationary pressures. Staffing costs represent approximately 50% of the Council’s direct costs. Additional income is being recognised from Council assets, and the return on investment income from treasury management activities is performing well due to high interest rates.
2.17	Reserves and Balances: The total balance of General Fund Earmarked Reserves was £48.57m as of 1 April 2023, and the current projected balance at the end of the April 2027 is £32.16m. Reserve movements are still to be finalised and do not include any use of reserves to fund budget gaps as presented in Appendix A5 . The General Fund balance remains at £6m, with no planned use over the current MTFS. This will be reviewed before the end of the budget process to consider if this is still an appropriate level of balance, given the increased pressure and funding uncertainty going forward.
2.18	The detailed budget process includes an assessment of risk, the adequacy of General Fund balances and a review of earmarked reserves. This review evaluates the need to create and/or change earmarked reserve levels and to release

	reserves which are no longer required, thereby becoming a one-off resource for the Council. As part of this year's review it will include a refresh of the reason for/purpose of each reserve, and how and when they can be used.
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3 How to address current situation

3.1	The Council has a statutory duty to deliver a balanced budget for the forthcoming year and Full Council will consider this budget at its February 2024 meeting.
3.2	The Finance team continues to work with officers and the Corporate Leadership Team throughout the budget setting process which will lead to continual updating of the MTFs until a balance budget is achieved.
3.3	The Government published the Local government finance policy statement 2024 to 2025 on 5 December 2023 and details are provided in Appendix B . The provisional settlement followed on 18 December 2023.
3.4	Part of the process of delivering a robust medium term strategy to enable the Council to manage its affairs soundly, is to have regard to both external and internal risks, and to identify actions to mitigate those risks. MTFs key principles and a risk analysis together with mitigating actions are provided in Appendix A1 of the MTFs.
3.5	Section 25 of the Local Government Act 2003 places a personal duty on an authority's Chief Financial Officer to make a report to Council about the robustness of the estimates made for the purposes of the council tax calculations and the adequacy of financial reserves and balances. The Act also requires the Council to have regard to the report before it makes its budget and council tax decisions.
3.6	In relation to the statutory duty under the Act, the Chief Financial Officer considers that the estimates are robust; the General Fund Balance is within the guideline levels established as part of the MTFs; and the contributions to and use of earmarked reserves will assist the Council in meeting its financial challenges and developing its response to the pandemic and the objective of financial sustainability.
3.7	The Chief Finance Officer's report will be reported to Full Council when it considers the budget for 2024/25 on 21 February 2024. The report statement will clearly set out the budget assumptions used to arrive at the final recommendations.

4 Reason/s for recommendation

4.1	This report brings together the relevant information to enable Cabinet to review, consider, and comment upon the Council's General Fund revenue budgets before making final recommendations to Council on 21 February 2024. This report also forms the basis of Scrutiny Committee's review of the Budget at its meeting on 18 January 2024 as required under the Budget and Policy Framework.
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Appendices

Appendices:	
Appendix A	Medium Term Financial Strategy (December 2023 update)
Appendix A1	MTFS Key Principles and Risk Analysis
Appendix A2	East Suffolk Council Tax Base 2024/25

Appendix A3	NHB Reserve Summary 2023/24 to 2027/28
Appendix A4	MTFS Updates as at December 2023 – Key Items
Appendix A5	General Fund Revenue Budget Summary 2024/25 to 2027/28
Appendix B	DLUHC - Local government finance policy statement 2024 to 2025
Appendix C	Provisional Local Government Finance Settlement 2024/25

Background reference papers:

Date	Type	Available From
02/11/2023	Bank of England Monetary Policy Report – December 2023	https://www.bankofengland.co.uk/monetary-policy-summary-and-minutes/2023/december-2023
22/11/2023	Chancellor’s Autumn Statement 2023	Autumn Statement 2023 - GOV.UK (www.gov.uk)
22/11/2023	Office for Budget Responsibility - Economic and fiscal outlook – November 2023	Economic and fiscal outlook – November 2023 - Office for Budget Responsibility (obr.uk)
05/12/2023	DLUHC - Local government finance policy statement 2024 to 2025	Local government finance policy statement 2024 to 2025 - GOV.UK (www.gov.uk)
18/12/2023	Provisional local government finance settlement: England, 2024 to 2025	https://www.gov.uk/government/collections/provisional-local-government-finance-settlement-england-2024-to-2025 https://questions-statements.parliament.uk/written-statements/detail/2023-12-18/hcws148



EAST SUFFOLK COUNCIL

**MEDIUM TERM FINANCIAL STRATEGY
2024/25 – 2027/28**

DECEMBER 2023

1 INTRODUCTION

- 1.1 The **Medium Term Financial Strategy** (MTFS) sets the strategic financial direction for the Council. It sets out the key financial management principles, budget assumptions and service issues.
- 1.2 The MTFS provides a framework for the detailed budget setting process to ensure that resources are managed effectively and are able to deliver the aspirations of the Council as set out in the Strategic Plan. It provides a sound basis for planning and decision making, and is reviewed and updated at the following key points in the year:
- November/December – as a framework for initial detailed budget discussions for the forthcoming financial year.
 - January – an update to include additional information received at a national level and corporate issues identified through service planning and the detailed budget build.
 - February – with the final budget for the new financial year.
- 1.3 The MTFS underpins the strategic direction for East Suffolk ‘Our Direction 2028’, focussing on the following four themes and priorities, whilst recognising the financial challenges;
- Environmental Impact
 - Thriving Economy
 - Tackling Inequalities
 - Sustainable Housing
- 1.4 The MTFS provides an integrated view of the Council’s finances, recognising that the allocation and management of its human, financial and physical resources play a key role in delivering its priorities and ensuring that the Council works effectively with its partners locally, regionally and nationally.
- 1.5 The key underlying principles of the MTFS are:
- securing a balanced budget with reduced reliance on the use of reserves and general balances to support its everyday spending;
 - setting increases in Council Tax when appropriate; and
 - delivering service efficiencies and generating additional income where there are opportunities to do so.
- 1.6 Part of the process of delivering a robust MTFS to enable the Council to manage its affairs soundly, is to have regard to both external and internal risks, and to identify actions to mitigate those risks. MTFS key principles and a risk analysis together with mitigating actions are provided in **Appendix A1**.
- 1.7 Sections 2 to 4 provide an update on the financial challenge facing the Council, taking into account the economic factors, the local government finance environment, and the Council’s key funding streams. Sections 5 to 7 outline how the Council will respond to the challenges, as expressed in terms of its budget and strategies towards reserves and capital.

2 PUBLIC FINANCES

- 2.1 On 22 November 2023 the Chancellor held the Autumn Statement 2023. No new funding was announced for local authorities, and the outlook for local government spending reviews continues to look very tight, with pressure on the public sector to achieve 0.5% annual productivity improvements. The Autumn Statement focused on reducing debt, cutting tax and rewarding hard work, back British business, building domestic and sustainable energy and delivering world-class education.
- 2.2 Following the Autumn Statement, concern over the financial sustainability of many councils across the country continues to be highlighted. Government funding for councils has increased in recent years, but a combination of high inflation and rising demand for services places unprecedented pressure on local authority budgets. Longer-term funding certainty is required, alongside promised reform of the funding system which has been delayed for several years now.

3 ECONOMIC INDICATORS

- 3.1 The Office for Budget Responsibility (OBR) published its latest report to coincide with the Autumn Statement. The OBR provides an independent judgement about economic and fiscal prospects and the impact of government policies.
- 3.2 The latest report from the OBR indicates that the economy recovered more fully from the pandemic and has been resilient to the energy crisis. The economy is expected to grow more slowly over the medium term and inflation is expected to be more persistent and domestically fuelled. The OBR forecasts inflation to continue to fall gradually, with Consumer Price Index (CPI) inflation expected to be 4.8% in Quarter 4 of 2023 and fall further to 2.8% in Quarter 4 of 2024. CPI inflation is expected to fall below 2% during 2025 to 2027, before returning to the Bank of England's target of 2%. Interest rates are also expected to remain higher for longer to control inflation.
- 3.3 The current economic environment is one of high inflation and interest rates. The national economic background affects the costs the Council incurs, the funding it receives, and contributes to the demand for services as residents are affected by economic circumstances.

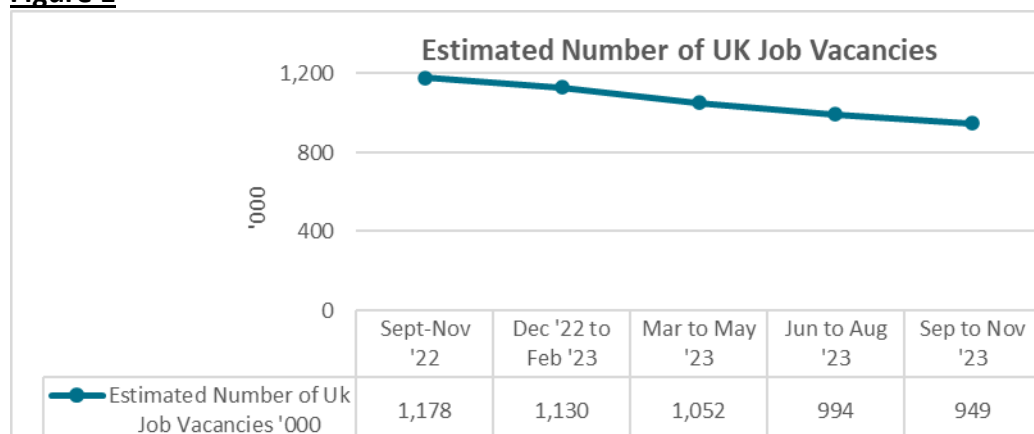
Gross Domestic Product (GDP)

- 3.4 Data released by the Office for National Statistics (ONS) in November, estimates no GDP growth in Quarter 3 2023 (July to September), compared to a 0.2% increase in Quarter 2. In output terms, there was 0.1% increase in construction output which offset a 0.1% fall in the services sector. There was a fall in household consumption from lower spending on miscellaneous goods and services, transport, and spending on food and non-alcoholic drink. There was also a decrease in government spending, particularly in the areas of health and education.

Employment

- 3.5 The OBR central forecast for unemployment expects this to rise to 1.6 million people (4.6% of the labour force) in the second quarter of 2025, which reflects rising interest rates and slower GDP growth.
- 3.6 As per the ONS, in September to November 2023 the estimated number of job vacancies in the UK was 949,000. This is down by 229,000 a year ago but remains 148,000 above pre-pandemic levels (January to March 2020). See **Figure 1** below.

Figure 1

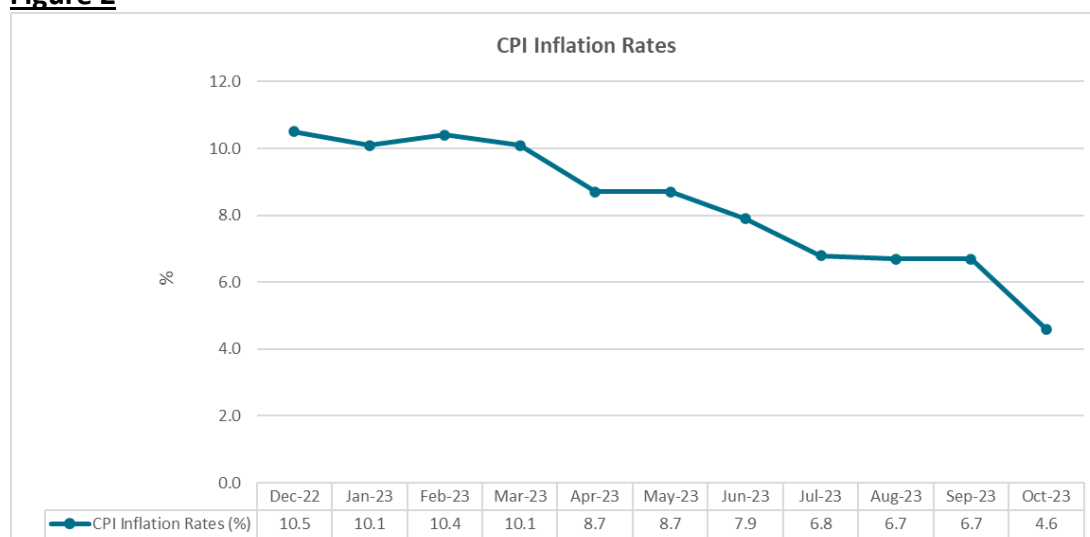


Source: ONS December 2023

- 3.7 The national living wage will increase from 1 April 2024 by 9.8% to £11.44 with the age threshold lowered from 23 to 21 years old.

Consumer Pricing Index (CPI)

- 3.8 Twelve-month CPI inflation to October 2023 was 4.6%, down from 6.7% in September. The largest downward contribution came from falling gas and electricity prices, although these still remain high compared to recent years. The price of gas in October 2023 was around 40% higher than in October 2021, and the price of electricity was around 40% higher compared to last year.
- 3.9 The Bank of England projects for CPI inflation to fall to around 4.5% by the end of the year and to continue to fall towards the 2% target next year.
- 3.10 For local government, the September CPI is important because it will be used to index the business rates multiplier, and to uplift Revenue Support Grant (RSG) and the baselines within the Business Rates Retention System (BRRS).
- 3.11 **Figure 2** below shows the CPI rates from October 2022 to date.

Figure 2

Source: ONS November 2023

Bank Interest Rate

- 3.12 At its meeting on 13 December 2023, the Bank of England’s Monetary Policy Committee (MPC) voted by a majority of 6-3 to maintain the Bank Rate at 5.25%, Three members of the Committee preferred an increase of 0.25% to 5.5%. The next meeting of the MPC to review the bank rate is 31 January 2024.

4 LOCAL GOVERNMENT FINANCE

- 4.1 The introduction of the Local Business Rates Retention System in 2013/14, together with the Government’s programme of fiscal consolidation since 2010, have combined to both reduce the level of funding available to the Council, and to shift the balance of funding significantly away from central to local sources.
- 4.2 The Spending Review 2021, which covered 2022/23 to 2024/25 was broadly positive for local government, with funding better than expected. Increased funding was largely front loaded with growth in grant funding in 2022/23 and no further general increases in the following two years. There were various smaller allocations within the core funding announcement, including £200m for the “cross-government Supporting Families programme”, £37.8m for cyber security and £34.5m for “strengthen local delivery and transparency”.
- 4.3 On 5 December 2023 DLUHC published a Local Government Finance Policy Statement 2024/25. This set out the government’s intention for the local Government Finance Settlement for 2024/25. This builds on the policy statement released the same time last year, with no significant change to funding proposals. It is noted in the policy statement that in recognition of pressures across the sector, all authorities will see at least 3% increase in their Core Spending Powers before any decision on organisation efficiencies, use of reserves, and council tax levels, through the Funding Guarantee. There will also be another year of New Homes Bonus.
- 4.4 The Policy Statement also confirmed the Council Tax referendum principles which is unchanged from last year.

4.5 The provisional settlement was released on 18 December. The government has launched a consultation on the provisional settlement which will run until 15 January. Responses will be considered before the release of the final settlement so there is the potential for changes to be made in the final settlement. Due to the timing of the release of the provisional settlement and the publication of this report, the MTFs figures for settlement grants, will be updated in readiness for the Scrutiny Committee meeting on 18 January 2024. The New Homes Bonus has however been captured.

4.6 **Core Funding Streams** – this includes the Revenue Support Grant and the Rural Services Delivery Grant.

Revenue Support Grant (RSG)

4.7 For 2023/24 two grants have been rolled into RSG. This is the Local Council Tax Administration Grant (£0.268m) and the Family Annexe Council Tax Grant (£0.061m). Both Grants are currently received by the Council separately and are not new grants. Based on the Policy Statement the RSG grant (including the rolled in grants) will increase at September CPI (6.7%) to £0.400m on the current year. This is additional income to next year of £0.060m. For the purpose of update the MTFs, it will be assumed that the grant will continue at £0.400m across the MTFs.

Revenue Support Grant	2023/24 £'000	2024/25 £'000	2025/26 £'000	2026/27 £'000	2027/28 £'000
MTFS (December 2023)	(703)	(400)	(400)	(400)	(400)

Rural Services Delivery Grant (RSDG)

4.8 The Rural Services Delivery Grant (RSDG) is a government grant recognising cost pressures associated with service delivery in rural sparse areas. The 2023/24 Final Settlement unexpectedly increased this grant to £0.291m from £0.260m. The Policy Statement indicates that this grant will continue for next year and the current assumption for future years is to remain at the 2022/23 level.

Rural Services Delivery Grant	2023/24 £'000	2024/25 £'000	2025/26 £'000	2026/27 £'000	2027/28 £'000
MTFS (December 2023)	(291)	(260)	(263)	(265)	(265)

4.9 **Non-Core Funding Streams** - the below grants are non-core funding streams and they are usually seen as temporary or one-off. This potentially gives the Government scope to make changes to funding distributions.

Funding Guarantee Allocation

4.10 For 2023/24 the Government announced repurposing the Lower Tier Services Grant (LTSG) (£0.311m for East Suffolk) and a proportion of the expired New Homes Bonus legacy payments to ensure that all councils would see at least a 3% increase in Core Spending Power before any decisions about organisational efficiencies, use of reserves or Council Tax levels. The LTSG was abolished and repurposed towards a new funding stream, the Funding Guarantee Allocation, in recognition of the inflationary pressures across local authorities. For 2023/24 the Council received an allocation of £1.512m and the recently issued Policy

Statement indicates this funding will be made available for 2024/25. The current MTFS assumes a continuation of this funding.

Funding Guarantee Allocation	2023/24 £'000	2024/25 £'000	2025/26 £'000	2026/27 £'000	2027/28 £'000
MTFS (December 2023)	(1,512)	(1,519)	(1,519)	(1,519)	(1,519)

Services Grant

- 4.11 This was a new one-off grant in 2022/23 to provide funding to all tiers of local government in recognition of the vital services, including social care, delivered at every level of local government. This funding continued in 2023/24 but at a reduced level from £0.477m to £0.280m. The current MTFS assumes this funding will continue in some form when the local government finance system is reformed. The Policy Statement confirms this funding will be made available in 2024/25, although at a reduced amount.

Services Grant/Transition Funding	2023/24 £'000	2024/25 £'000	2025/26 £'000	2026/27 £'000	2027/28 £'000
MTFS (December 2023)	(280)	(269)	(269)	(269)	(269)

Business Rates – Business Rates Retention and Fair Funding Review

- 4.12 In February 2016 a Fair Funding Review was also announced, which will affect how funding is allocated and redistributed between local authorities. Implementation of this review has been delayed and is now unlikely to be implemented before 2026/27, a shift from 2025/26 at the last budget setting round.
- 4.13 Implementation of the Fair Funding Review is likely to include a 'reset' of the business rates system, which would involve assigning a new baseline funding level and subsequent new tariff or top-up values. Reset of the system and the establishment of new funding formulae could result in East Suffolk Council losing some of the financial advantage that it has under the current system. As a result of the delay in implementing Business Rates reforms, the Council has benefited from additional years under the current regime. This base assumption has been rolled forward in the MTFS and the figures presented in paragraph 4.16 below.

Business Rates

- 4.14 Since 2013/14, business rates income has tended to be characterised by a high degree of volatility and uncertainty. Variances between estimated and actual business rate income are realised in the form of deficits or surpluses on the business rates element of the Collection Fund. For each year, the amount of business rates income credited to the General Fund is the amount estimated on the National Non-Domestic Rate (NDR1) return to Government submitted in January in the preceding year, including a calculation of the estimated Collection Fund deficit or surplus to be charged to the General Fund. As a result, in practice, variances between business rates estimates and actual figures are reflected as an element of the Collection Fund deficit or surplus two years after they take place. The figure for the 2024/25 Collection Fund deficit will be calculated in January 2024 for the budget process.

- 4.15 **Suffolk Pool** – In October 2023 all Suffolk councils agreed to continue a pooling arrangement for 2024/25, which would allow them to retain a larger proportion of their share of growth by reducing the overall levy rate for Suffolk to £nil. Suffolk County Council is the administering authority for the Pool and collates the NNDR1 returns of all of the Suffolk authorities. In addition, and for 2024/25 only, Suffolk Public Sector Leaders (SPSL) have agreed for their share of the pooling benefit for next year, to be distributed to the pool members using the same methodology as for the normal distribution. Demand and inflationary pressures are having a significant impact on council budgets and this will provide additional financial support through these pressures and to assist with setting balanced budgets and to protect council services. The Council is currently estimated to receive a Pooling Benefit for next year of £3.9m. In addition to this, the Pool also holds a £2m contingency reserve, also to be re-distributed to the Pool members in 2024/25. The total estimated value for the Pooling Benefit to the Council is £4.6m, this is £3.6m above the current budget for next year.
- 4.16 Business Rates income for 2024/25 is based on the NNDR1 return. All Business Rates estimates included in the MTFs, including the Pooling Benefit will be updated following the completion of the return in January 2024. This will include the split between Section 31 Grant and actual rates income. The MTFs includes a reducing Pooling Benefit estimate for 2026/27 onwards, reflecting the uncertainty with reform of the system.
- 4.17 As referred to earlier, the Business Rates system may be subject to reform after 2026/27 with the changes potentially not impacting as seriously as previously forecast. In light of the impending reform, the approach that has been taken is to roll forward the estimates for 2023/24 through to 2027/28, with the exception being a tapering of the Pooling Benefit estimate. This is to reflect a cautious approach to the overall Business Rates income position in the latter years of the MTFs. Inflation in the system and the interaction between business rates income and the 2023 Revaluation adjustment improved the position for 2023/24, and it is uncertain how this will impact in 2024/25. This position will not become clear until the NNDR1 is completed in January. To plan for mitigating this, surplus income (£2.46m) from Business Rates, over and above addressing the budget gap for the current year(2023/24), has been transferred to the Business Rates Equalisation Reserve. The MTFs assumption is that the Council will continue to retain 100% Business Rates income from Renewables, and this has been reflected in the table below. It is also worth noting that even if the current treatment of existing Renewables is revised, any new Renewable hereditaments coming online during the MTFs period will improve the forecast position.

Business Rates Income	Original 2023/24 £'000	MTFS 2024/25 £'000	MTFS 2025/26 £'000	MTFS 2026/27 £'000	MTFS 2027/28 £'000
Business Rates Income	(6,852)	(6,852)	(6,852)	(6,852)	(6,852)
Business Rates Renewables	(1,560)	(1,560)	(1,560)	(1,560)	(1,560)
Total Business Rates Income	(8,412)	(8,412)	(8,412)	(8,412)	(8,412)
Share of Pooling Benefit	(2,000)	(4,600)	(2,000)	(1,000)	(500)
Section 31 Grant	(10,677)	(10,677)	(10,677)	(10,677)	(10,677)
Total Income Relating to Business Rates	(21,089)	(23,689)	(21,089)	(20,089)	(19,589)

Council Tax

- 4.18 Council Tax is one of the Council's most important and stable income streams, funding approximately 40% of the net budget requirement of the Council. The Policy Statement for 2024/25 confirms a council tax referendum principle for shire district councils of up to 2.99% or £5, whichever is higher.
- 4.19 **Council Tax Base** – The CTB1 Council Tax Base Return was submitted to Government on 2 October 2023.
- 4.20 The 2024/25 Council Tax Base at **Appendix A2** was approved by Cabinet at its meeting on 5 December 2023. The increase in the tax base for East Suffolk is currently estimated to be 677.81 (0.75%) Band D equivalent properties, increasing the overall tax base for East Suffolk from 90,340.92 to 91,018.73 for 2024/25. This equates to around £0.123m of additional Council Tax income to the Council based on the current District Band D Council Tax of £181.17.
- 4.21 **District Band D Council Tax 2024/25** – Assuming an increase of up to the referendum principle for 2024/25, this would equate to a District Band D Council Tax for East Suffolk of £186.57, an increase of £5.40 or 2.98%. It would generate approximately £0.492m of additional income for East Suffolk. Total income to the Council from Council Tax would be £16.982m.
- 4.22 Based on the above data, the table below sets out the current estimated Council Tax income based on the referendum limits of 2.99% or £5, whichever is higher and is included in the MTFS.

Council Tax Income	Estimated 2023/24 £'000	Estimate 2024/25 £'000	Estimate 2025/26 £'000	Estimate 2026/27 £'000	Estimate 2027/28 £'000
Council Tax Income - Base	(15,688)	(16,367)	(16,982)	(17,502)	(18,026)
Growth in Tax Base	(232)	(123)	(68)	(70)	(72)
Council Tax Increase	(447)	(492)	(452)	(454)	(456)
Total Council Tax Income	(16,367)	(16,982)	(17,502)	(18,026)	(18,554)
Council Tax Band D	£181.17	£186.57	£191.52	£196.47	£201.42
Council Tax Base	90,340.92	91,018.73	91,382.80	91,748.34	92,115.33
Growth/Reduction(-) in Tax Base	1.48%	0.40%	0.40%	0.40%	0.40%
Council Tax Increase £	£4.95	£5.40	£4.95	£4.95	£4.95
Council Tax Increase %	2.81%	2.98%	2.65%	2.58%	2.52%

Assumptions from 2024/25: Council Tax increases of 2.99% or £5, whichever is the higher.

- 4.23 The February 2023 MTFS for 204/25 had assumed growth to the tax base of 0.40% compared to the current estimate of 0.75%. This additional growth of 0.35% is about £0.060m of additional income. From 2025/26 a cautious approach continues to be taken to growth in the overall tax base and this is forecast to fall for the remainder of the MTFS period. This is a combination of completion of development sites levelling off, and prudent assumptions regarding LCTRS reliefs and collection rates. The below table shows the December update to the MTFS for Council Tax income.

MTFS - Council Tax Income	Estimate 2023/24 £'000	Estimate 2024/25 £'000	Estimate 2025/26 £'000	Estimate 2026/27 £'000	Estimate 2027/28 £'000
MTFS February 2023	(16,367)	(16,882)	(17,400)	(17,922)	(17,922)
MTFS December 2023	(16,367)	(16,982)	(17,502)	(18,026)	(18,554)
MTFS Update December 2023	(0)	(100)	(102)	(104)	(632)

- 4.24 **Council Tax Collection Fund** – The current estimate for the Council Tax Collection Fund for 2024/25 is a surplus of £1.091m, with East Suffolk’s share equating to £0.140m. The remaining balance of the surplus is shared by Suffolk County Council and the Police and Crime Commissioner for Suffolk.
- 4.25 The Collection Fund is monitored closely throughout the financial year and the Collection Fund position will be confirmed in January 2024.
- 4.26 **Council Tax Premium on Second Homes** - The Levelling-up and Regeneration Bill received Royal Assent at the end of October 2023 which included giving billing authorities the discretion to charge a 100% premium on second homes or empty dwellings. It gives billing authorities the power to charge a 100% premium on “dwellings occupied periodically”. At its meeting on 25 January 2023, Full Council approve this in principle, subject to the Bill receiving Royal Assent. In order to implement the premium, a clear 12 month period and a full financial year’s notice is required. Therefore the earliest a Second Home Premium could be charged is the 1 April 2025. Although the Act has been passed the categories of properties exempted from the second home premium have not yet been disclosed and regulation is being awaited.
- 4.27 Given the number of second homes in Suffolk, this 100% council tax premium should represent a significant addition to the income stream from Council Tax. It is estimated that this could generate in the region of £8m in East Suffolk - £6.2m for Suffolk County Council, over £1m for Suffolk Police, and £0.700m for East Suffolk Council. The current MTFS does not yet take account of this potential additional income for East Suffolk Council.

New Homes Bonus (NHB)

- 4.28 The Government established the New Homes Bonus to provide an incentive for local authorities to encourage housing growth in their areas. NHB is funding allocated to councils based on the building of new homes and bringing empty homes back into use. The intention for the New Homes Bonus is to ensure that the economic benefits of growth are returned to the local authorities and communities where growth takes place.
- 4.29 In recent years there has been much uncertainty as to the future of NHB, with the last three years being a one-year settlement and another one year settlement has now been confirmed for 2024/25. This is estimated to be in the region of £0.650m.
- 4.30 The Council uses NHB funding to support specific community related projects and initiatives across East Suffolk. This is balanced against the overriding need to retain financial sustainability. NHB funding is transferred to the NHB reserve and released when required. The primary use of the funding is for the East Suffolk Community Partnerships and the Enabling Communities Budgets, totalling approximately £1m per annum. In November 2022, Cabinet considered and approved a paper to continue the Enabling Communities Budgets until March 2027 and for the Community Partnerships to continuing until 2024/25, with a further two years subject to NHB funding being available. This is

reflected in the updated position on the NHB Reserve below. No further funding is anticipated beyond 2024/25 and insufficient funding would remain beyond March 2027 to continue both of these initiatives.

- 4.31 **Appendix A3** sets out the current position on the NHB Reserve and the proposed use of NHB funding for East Suffolk Council. This is summarised in the table below.

NHB Reserve	Forecast 2023/24 £'000	Forecast 2024/25 £'000	Forecast 2025/26 £'000	Forecast 2026/27 £'000	Forecast 2027/28 £'000
Opening Balance	(5,438)	(3,919)	(3,078)	(1,818)	(682)
Add: Allocation Received	(447)	(650)	0	0	0
Less: Proposed Use	1,966	1,491	1,260	1,136	50
Closing Balance	(3,919)	(3,078)	(1,818)	(682)	(632)

5 MEDIUM TERM FINANCIAL POSITION

MTFS Forecasts 2024/25 to 2027/28

- 5.1 The Finance team works with Service Areas to review their budget requirements and budget monitoring is an ongoing process between Finance, Service Areas, and the Corporate Leadership Team. This work leads to continual updating of the MTFS for the Council. As of December 2023, key areas of the budget that are yet to be finalised include;
- East Suffolk Services Ltd (ESSL)
 - Business rates income
 - Announcement of the Local Government Settlement for 2024/25
 - Use of reserves.
- 5.2 The following areas are identified as having potential revenue budget implications for this financial year and future years. Some areas cannot yet be quantified or quantified with a degree of certainty, i.e. figures are currently being worked on and/or insufficient information available.

Budget Area to be Monitored	Areas Impact	Nature of Impact	Timing of Impact
Asset Management Rent Review.	Council income budgets from assets.	Potential to increase the income to the Council. This will need to be quantified and captured in the update of the Council's MTFS into next year's budget setting.	Current year and going forward.
Capital Programme.	Revenue implications from capital programme revisions.	Additional revenue costs to the General Fund - direct revenue financing, use of reserves, capital charges to revenue, revenue costs to support delivery of capital projects and income generation from capital projects.	On-going
ESSL.	General Fund, HRA and	Service investment for ESSL. Council budgets to be updated to reflect management fee to ESSL	Current year and future years.

Budget Area to be Monitored	Areas Impact	Nature of Impact	Timing of Impact
	capital programme.	and some services brought back in-house. Recognition of service investment and improve plan for ESSL and costs pressures in the operations environment, e.g. pay and inflation.	
Inflation.	General Fund, HRA and Capital Programme.	Increasing costs.	Current year and future years.
National pay award for 2024/25.	Council staffing costs.	Current budget assumption is for a 3% increase for Council staffing n 2024/25. Based on the pay settlements for the current year and last year, this would be above the current budget assumption.	2024/25 and future years.
Norse.	Profit share income.	Settlement of 2022/23 profit share (Accrued £0.560m) and April-June 2023/24 (Budgeted £0.074m). The position will be assessed as part of Quarter 3 monitoring.	Current year.
Recruitment difficulties.	Particular area of specialism.	Agency and contract costs may be required which can be more costly. Current forecasts show this being absorbed in existing budgets.	Ongoing.
Treasury Management Investment income.	General Fund and HRA income.	With higher rates of interest this is providing favourable returns on treasury management investments.	Current year and the next 2-3 years.
Workforces pay pressure/grade inflation.	Council staffing costs.	Increased staffing costs. Annual staffing vacancy allowance in the budget is at risk.	Ongoing.

5.3 The MTFS was last updated in February 2023. A summary analysis of the key movements as of December 2023 is shown in the following table. This table is supported by **Appendix A4 Appendix A5**. As noted in paragraph 5.1 above, there is continual updating of the MTFS and there are key areas of the budget still to be finalised which are not included in this update.

MTFS Updates	2024/25 £'000	2025/26 £'000	2026/27 £'000	2027/28 £'000
Additional Cost	4,204	4,264	3,723	4,341
Savings	(1,003)	(1,203)	(1,628)	(1,528)
Additional Income	(6,965)	(3,933)	(2,789)	(2,661)
Reduced Income	255	255	255	255
Use of Reserves	2,209	(260)	532	852
Net Total	(1,300)	(877)	93	1,259

5.4 The updated MTFS position resulting from these movements as of December 2023 is shown below.

MTFS Position	2024/25 £'000	2025/26 £'000	2026/27 £'000	2027/28 £'000
MTFS February 2023 Budget Gap/(Surplus)	3,511	6,008	6,405	6,405
Net Total of MTFS Updates (Appendix A4)	(1,300)	(877)	93	1,259
MTFS December 2023 Budget Gap/(Surplus)	2,211	5,131	6,498	7,664

Budget Planning Assumptions

5.5 The Council's financial planning assumptions are summarised below:

Budget Area	Assumption
Inflation	
<i>Goods & Services</i>	3% for budgets which are subject to inflation and where inflation is built into contracts.
<i>Utilities (Electricity)</i>	2024/25 4.4% increase (November Monetary Policy Report forecast CPI for Q1 2024), future years maintain at the 2024/25 budget.
<i>Utilities (Gas)</i>	2024/25 4.4% increase (November Monetary Policy Report forecast CPI for Q1 2024), future years maintain at the 2024/25 budget.
<i>Utilities (water & Sewage)</i>	2024/25 4.4% increase (November Monetary Policy Report forecast CPI for Q1 2024), future years maintain at the 2024/25 budget.
Fees & Charges	3% increase to be applied for 2024/25 where appropriate.
Staffing Costs	2023/24 Current offer of an additional £1,925 on all SCP 1 and above, 2024/25 3% increase, plus incremental progression, 2025/26 onwards 2% increase, plus incremental progression. 4% per annum of staffing costs for vacancy allowance.
Investment Income	2.75% Call Account (average as of September 2023), (2.15% Sept 2022) 5.19% Money Market Fund (September 2023), (1.73% Sept 2022) 3.80% Property Fund (average as of September 2023), (3.4% Sept 2022) 4.05% Diversified Income Fund (September 2023), (4.05% Sept 2022)

Goods & Services – Inflationary Pressures

- 5.6 The Council's financial strategy has previously assumed for a number of years that any inflationary pressures incurred on goods and services expenditure are contained within existing budgets, or through more efficient spending. The exceptions being utility costs, rates and specific contract increases.
- 5.7 It is now recognised that this approach is becoming more challenging with inflation remaining high. Budget headings are therefore being reviewed as part of the process where inflationary increases are evident. For example, subscriptions and software licensing. As mentioned in Section 3, there is an expectation for inflation to gradually fall over the next two year but higher base costs will be part of the Council's budgets going forward due to the current inflationary pressures. The impact of inflation is most evident in the Capital Programme, utilities and insurance premiums, and the Council's Operation services.

- 5.8 Contracts have been inflated based on the specified inflation indices within each individual contract. Retendering of contracts is part of the Council's strategy for cost reduction and to ensure best value.

Fees and Charges

- 5.9 Fees and Charges are based on the Council's agreed principles of increasing existing fees and charges on a market forces basis, whilst remaining consistent with the Council's Strategic plan and relevant Governments legislation.
- 5.10 Prior to 2022/23, the Council adopted a standard approach, increasing fees and charges in line with price inflation as a minimum uplift. However, given the heightened inflation levels, this approach was not applied for the review of 2023/24 or 2024/25 fees and charges, with a reduced rate of 3% recommended for 2024/25, in line with future forecasts, ensuring the Council remains affordable to its stakeholders.
- 5.11 Charges are reviewed considering local demand, along with reflecting changes in the cost of delivering the services, factoring changes that have either already occurred, or are expecting to occur over the next financial year, with cost recovery aimed to assist in balancing the overall cost pressures. Unless statutory restrictions apply, the Council aims to use all resources available, which includes reviewing opportunities to introduce new fees as appropriate. Proposed fees and charges for 2024/25 will be considered by Cabinet on 2 January 2024.

Interest Payable and Receivable

- 5.12 **Interest Payable** - The budget for debt interest over the current MTFS period totals £1.587m. This has not been revised in this update of the MTFS. The existing loans are all fixed rate loans and therefore not susceptible to market increases. Where the capital programme requires future additional borrowing, the budget will be updated as and when projects are completed and actual borrowing is known.
- 5.13 **Interest Receivable** – Short-dated cash rates are around 5.2% for 3 month rates (4.1%, 6 April 2023) and 12-month rates around 5.55% (4.4%, 6 April 2023). The rates on the Treasury's Debt Management Account Deposit Facility (DMADF) currently range between 5.17% and 5.25% (4% to 4.1%, 6 April 2023).
- 5.14 The Council's investment portfolio in the short term is looking healthy with the prospect of increased returns on investments. In the current year it is expected that actual investment income will exceed the budget of £1.6m, by at least £2.4m. For the MTFS, it is expected for investment income to remain high for the next two years, and then for a cautious approach to be taken with estimates thereafter. For 2024/25, the budget for investment income is being increased by £1.74m and £1.040m the year after. It should be noted that not all of this benefit will be realised in the General Fund, as the HRA share of investment income will also increase.

Establishment Costs

- 5.15 Establishment costs total are the single largest revenue cost for the Council and represents 50% of its total direct expenditure.

- 5.16 **Public Sector Pay** –The 2023/24 pay award was £1,925 (pro rata for part-time employees) on pay points 2 to 43. This exceed the current budget assumption of 4%, in the region of £0.700m to £0.800m. This will impact all years of the MTFS. The pay award assumption for 2024/25 is current 3% and 2% thereafter. A contingency will be incorporated into the budget for the pay award to be above the current assumption for next year.
- 5.17 **Actuarial Valuation** - The latest triennial actuarial valuation of the assets and liabilities of the Suffolk County Pension Fund was completed on 31 March 2022. The Fund’s Actuary have reported the actuarial funding position for the Pension Fund of 107%, an increase of 8% since the last valuation exercise in 2019. This is the first time that the Fund has reached 100% funding.
- 5.18 The Pension Fund specifically relating to East Suffolk Council is 110% funded, an increase from 99% at the time of the last review on 31 March 2019. The triennial review also sets the employer contribution rates for the next three years – 2023/24 to 2025/26. This was set at 25% and provided 88% probability of success that over 20 years the Pension Fund will remain or achieve 100% funded.

Other Pressures

- 5.19 In formulating its detailed spending plans, the Council has also taken account of past performance and the previous year’s outturn position.
- 5.20 Ranging from increased demand for services or changes in national policy, the Council’s MTFS will be adjusted to reflect the financial implications of these changes. The budget monitoring work is ongoing with the Finance Team working with service areas to review their budget requirements. This work will continue to update the MTFS through to January 2024.

East Suffolk Services Limited (ESSL)

- 5.21 East Suffolk Council created ESSL to operate as a Local Authority Trading Company (LATCo) following a thorough review of its partnership with Norse which ended on 30 June 2023. Some functions and staff have transferred to the Council, and ESC budget estimates and profiles for 2024/25 are currently based on data of the previous partnership. With the new arrangement now in operation the Council and ESSL are currently working together on the budget for 2024/25. Over the budget setting process the Council and ESSL will be working together to build more detailed budget information and it is expected for updates to feed into the MTFS after Quarter 3 of the current year.

6 RESERVES AND BALANCES

- 6.1 In order to manage its financial affairs soundly, the Council needs to hold an appropriate and necessary level of reserves and balances. These allow it to:
- a) manage its cash flows economically and avoid temporary borrowing pending receipt of income due during the year;
 - b) deal promptly and efficiently with emergencies if they occur, as this year;
 - c) take previously unseen opportunities to secure benefits that may arise during the year;

- d) mitigate reliance on volatile sources of funding;
 - e) set money aside for known events but where the timing or precise amount required is not yet certain; and
 - f) accumulate monies to meet costs that it would be unreasonable for taxpayers to meet in a single year.
- 6.2 In addition to the General Fund Balance, the Council keeps a number of earmarked reserves on the Balance Sheet. Some are required to be held for statutory reasons, some are needed to comply with proper accounting practice, and others have been set up voluntarily to earmark resources for future spending plans or potential liabilities.
- 6.3 The Council has continued to develop its prudent financial management arrangements, through the development of earmarked reserves to mitigate potential future risks. As issues arise, the potential requirement for an earmarked reserve is considered. New earmarked reserves are formally considered as part of the detailed budget process, to ensure that risks identified are adequately mitigated, and throughout the annual budget monitoring process as risks arise or become clearer.
- 6.4 The detailed budget process includes an assessment of risk, the adequacy of General Fund balances and a review of earmarked reserves. This review evaluates the need to create and/or change earmarked reserve levels and to also release reserves which are no longer required, thereby becoming a one-off resource for the Council. As part of this year's review it will include a refresh of the reason for/purpose of each reserve, and how and when they can be used.
- 6.5 A risk assessment of the General Fund Balances informs the Chief Finance Officer's view of the adequacy of reserves to provide assurance to the budget. Having regard to the financial risks surrounding the budget planning process; the Council has maintained for a number of years the level of General Fund balances at around 3%-5% of its budgeted gross expenditure (in the region of £130 million for East Suffolk). This would equate to maintaining a General Fund balance for East Suffolk, in the region of between £4m and £6m. As of 1 April 2023, the opening General Fund balance of East Suffolk stood at £6m. Given the pressures on council finances and the uncertainty with Government funding going forward it may be prudent to increase this general fund balance to between £6m and £8m.
- 6.6 Further use of the General Fund balance will be evaluated against an assessment of risk, to ensure financial sustainability for the Council is maintained, whilst supporting the strategy direction and ambitions of the Council. The current update of the MTFs does not include any use of the General Fund balance.
- 6.7 One of the key underpinning financial principles of the MTFs is to not use the Council's Reserves (and other one-off resources) as a primary method to balance the ongoing pressures in the budget. Earmarked reserves are used for specific one-off purposes to support the delivery of corporate objectives and to mitigate risks.
- 6.8 The opening balances for 2023/24 are subject to external audit review and could therefore change.

6.9 The total balance of General Fund Earmarked Reserves was £48.57m as of 1 April 2023. Earmarked Reserves are categorised into the following groups;

- **Grants/Funding Carried Forward** – this is external funding the Council has received for specific purposes and is drawn down from reserves when spend is incurred.
- **Planned Future Revenue Spending** – Council funding has been set aside for specific service areas and/or projects.
- **Planned Future Capital Spending** – this is revenue funding set aside to provide funding for the capital programme.
- **Risk Based** – Council funding has been set aside for unforeseen budget pressures and fluctuations in budget areas of volatility. The Business Rate Equalisation Reserve is the main reserve within this group. This reserve is held to manage fluctuations in Business Rates income, due to the timing of accounting treatments. The balance on this reserve as of April 2023 was £15.2m.

6.10 The projected balances on reserves will continue to be reviewed and updated throughout the budget process. The table below shows the current projections for the General Fund Earmarked Reserve over the MTFS, categorised as above. This summary does not include use of reserves to address the updated budget gaps as presented in **Appendix A5**. If the budget gap identified at this early stage of the MTFS for 2024/25, is still present at the end of the budget process, then use of the In-Year Savings Reserve and the risk based reserves will be made to balance the budgets.

East Suffolk General Fund Reserves	Opening Balance 1st April 2023	MTFS April 2024	MTFS April 2025	MTFS April 2026	MTFS April 2027
	£'000	£'000	£'000	£'000	£'000
Earmarked Reserves:					
Grants/Funding Carried Forward	6,107	3,961	3,845	3,793	3,742
Planned Future Capital Spending	1,161	1,012	1,155	1,347	1,539
Planned Future Revenue Spending	16,637	13,394	11,435	9,861	8,729
Port Health	3,699	1,277	739	338	0
Risk Based	19,799	19,133	18,118	18,138	18,148
Covid Reserve	1,165	0	0	0	0
Total Earmarked Reserves	48,568	38,777	35,292	33,477	32,158

7 CAPITAL STRATEGY

7.1 The Capital Strategy gives a high-level overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of local public services in East Suffolk, along with an overview of how associated risk is managed and the implications for future financial sustainability. The Capital Strategy for the period 2024/25 to 2027/28 will be considered by the Audit & Governance Committee and Cabinet before approval by Full Council in February 2024. Capital planning is about financial investment on the purchase of new assets, the creation of new assets and enhancing and/or extending

the useful life of existing assets. The Council aims to achieve the optimum balance between the future needs of East Suffolk, including the need to drive growth, whilst ensuring affordability in the short and long term. Key principles include:

- Developing asset and capital strategies that facilitate a long-term approach to decision-making.
- Ensuring that assets are only held as needed to achieve Council objectives.
- Maximising efficiency in the management and use of assets.
- Ensuring that pressure to achieve short-term savings does not compromise the value of assets through lack of investment.
- Ensuring that capital investment is targeted where it will achieve the greatest long-term benefit.

7.2 Enhancing the management of the Council's existing asset base and looking beyond the traditional medium-term financial planning horizon is a major priority. A refresh of the current Asset Management Strategy, which was approved in July 2019, is about to commence and will need to link with the MTFS.

7.3 For the purposes of setting the budget for 2024/25 and medium-term financial planning, the current rolling Capital Programme has been updated to reflect existing projects and the latest capital investment plans for the period 2024/25 to 2027/28 are included.

Capital Programme

7.4 The Capital Programme including both General Fund and HRA elements is subject to the scrutiny process and formally adopted by Full Council each year. The decision to accept individual projects onto the Programme is driven by the overriding requirement to support the priorities communicated in the East Suffolk Strategic Plan, providing they are affordable.

7.5 As well as adequately maintaining the asset base, a range of other important factors are considered when deciding upon the allocation of General Fund resources. Consideration is given to:

- Legislation – the need for capital investment due to changes in legislation, including those with health and safety implications.
- Resource Availability – the sustainability of the Capital Programme is a primary consideration and integral to the MTFS.

7.6 Where required, capital projects are supported by a detailed business case, which demonstrates a set of clear objectives and measurable benefits, as well as detailed financial implications. This includes the on-going revenue implications of a capital project, to ensure these are built into the MTFS revenue assumptions.

7.7 Major capital projects are delivered by dedicated project managers within the Council, with leadership and oversight provided by the Corporate Leadership Team.

- 7.8 The 2023/24 to 2027/28 Capital Programme will be presented to Cabinet on 2 January 2024, Scrutiny Committee on 18 January 2024, and then Cabinet and Full Council on 6 and 21 February 2024 respectively.

EAST SUFFOLK MEDIUM TERM FINANCIAL STRATEGY - KEY PRINCIPLES

1 PRIORITIES, AIMS AND OBJECTIVES

- 1.1 The **East Suffolk Strategic Plan** provides the overarching vision for East Suffolk. In fulfilment of the Plan, the Council makes use of significant resources to achieve its aims including money, people, property and technology. In order to allocate resources to competing demands, achieve effective and efficient use of its resources, best value and ultimately achieve its vision, the Council has several strategies and plans which give a clear sense of direction and underpin the deployment of those resources. The Long Term and **Medium Term Financial Strategies** sit under the **Strategic Plan**, and combined with other strategies and plans, they support and embrace the strategic direction of East Suffolk.

2 STRATEGY OBJECTIVES

- 2.1 The Council's MTFS aims to ensure the provision of the best quality services possible within the resources available. To do so it must maximise the use of its resources to ensure they are used efficiently and effectively to support the development of longer term sustainable objectives.
- 2.2 The specific objectives of the MTFS are to:
- a) ensure that the Council sets a balanced, sustainable budget year by year, so that forecast spending does not exceed forecast resources available to it;
 - b) plan for a level of Council Tax that the Council, its residents and Government see as necessary, acceptable and affordable to ensure that it has the financial capacity to deliver the Council's policies and objectives;
 - c) redirect resources over time to adequately support and resource the priorities of the both the Council and the wider community; and
 - d) maintain sufficient reserves and balances to ensure that the Council's long-term financial health remains sound.

3 STRATEGY PRINCIPLES

- 3.1 The principles set out below provide a framework within which the Council will develop its detailed financial plan over the medium term.

General

There are a number of overarching principles that will apply across the Council's detailed financial accounting, planning and monitoring:

- a) that the Council's budgets, financial records and accounts will be prepared and maintained in line with approved Accounting Standards, the CIPFA Code of Practice on Local Government Accounting, the CIPFA Prudential Code and the relevant sections of the Council's Constitution and Finance Procedure Rules;

- b) prior to setting a budget, the Council will always analyse potential risks and ensure these are minimised in line with its Risk Management Strategy;
- c) that the Council's Corporate Management Team will review the budget proposals for reasonableness and adherence to corporate policies and objectives prior to the budget being submitted to Cabinet;
- d) the Council will monitor its revenue and capital budgets effectively. Monitoring will be undertaken quarterly by Heads of Service together with their portfolio holders, and integrated quarterly monitoring reports will be reported to Cabinet. In cases where significant financial and service performance deviates from that planned, action plans setting out corrective action will be drawn up by Heads of Service / Portfolio Holders and reported to Cabinet as appropriate;
- e) that the Council's Corporate Leadership Team will take appropriate steps to continue to maintain and improve the accuracy and quality of data that it uses throughout the Council thereby ensuring that budget and other decisions are taken on a sound basis; and
- f) the Council will seek to maximise external contributions towards revenue and capital spending for example through bidding for specific grants, attracting levered funding, participating in new funding streams and engaging in further strategic partnering opportunities where appropriate.

General Fund (Revenue)

3.2 In relation to its revenue budgets the Council will:

- a) set a balanced budget each year that will be constructed to reflect its objectives, priorities and commitments. In particular, the budget will influence and be influenced by the Strategic Plan, the Organisational and Development Strategy, Capital and Asset Management Strategies, the Risk Management Strategy, its Comprehensive Equality Scheme and its Consultation and Engagement Strategies;
- b) within the constraints of the resources available to it, set a sustainable budget each year that meets on-going commitments from on-going resources. The Council will continue to aim to maintain its level of general balances when it sets its revenue budget each year now that a prudent level of balances has been achieved;
- c) seek to identify annual efficiency savings through business process improvement, shared service initiatives, service best value reviews and benchmarking and strategic partnering opportunities within and across county borders;
- d) review the appropriateness of service delivery between the Council, parishes and other partners;
- e) increase existing fees and charges on a market forces basis whilst having regard to the Council's policies and objectives. As a minimum fees and charges should be increased by price inflation. The Council will also review opportunities to introduce new fees as appropriate; and

- f) within Government guidelines, set a level of Council Tax that the Council, its residents and Government see as necessary, acceptable and affordable to deliver the Council's policies and objectives.

Capital

3.3 When considering capital investment, the Council will:

- a) maximise the generation of capital receipts and grants to support its planned investment programmes
- b) enhance its capital investment by applying specific grants and contributions, capital receipts, earmarked reserves and revenue contributions, with any balance being met by external borrowing
- c) not recognise capital receipts until there is certainty that the receipt will materialise, and these will not be earmarked against specific developments without express Cabinet approval
- d) allocate its capital resources in line with its Capital Strategy and Asset Management Plan whilst recognising that other priorities may emerge that may require those plans to be amended and resources to be diverted
- e) annually review and prioritise capital schemes in accordance with Council objectives having regard to:
 - i) the business case for any given project; asset management planning
 - ii) affordability in line with the application of the Prudential Code.

Balances and Reserves

3.4 In relation to its balances and earmarked reserves, the Council will:

- each year maintain a level of General Fund balances which takes account of the strategic, operational and financial risks facing the Council.
- have regard to the financial risks surrounding the budget planning process, including those associated with the structural deficit, inflationary pressures, interest rates, partnerships, the treatment of savings, new burdens and demand led expenditure.
- review its earmarked reserves, to ensure the rationale for holding the reserves and the amount of the reserves, remain consistent with their purposes and their approach to risk management; and
- return reserve balances no longer required to the General Fund as appropriate.

Treasury Management and Investment

3.5 The Council will:

- a) having regard to risk, maximise investment income and minimise borrowing costs within the overall framework set out in the Council's annual Treasury Management and Investment Strategy; and
- b) secure the stability of the Council's longer-term financial position rather than seeking to make short-term one-off gains which may lead to higher costs in the long term.
- c) having regard to risk, seek to diversify its investment portfolio; maximise investment income; and deliver economic development objectives through the Asset Investment Strategy (in development).

4 OTHER CONSIDERATIONS

4.1 The Council's spending will have regard to:

- a) the base budget position for the current financial year, adjusted for in year grant changes;
- b) the Council's medium term priorities;
- c) the refocusing of service expenditure through transactional, shared services and other efficiencies to support the achievement of its medium term priorities and satisfy Government funding changes;
- d) demographic and welfare changes;
- e) the impact of the current pandemic;
- f) consultation outcomes;
- g) fiscal matters including:
 - price inflation.
 - the effect on the level of General Fund balances and reserves.
 - the impact of any changes to the capital programme on the potential costs of borrowing.
 - triennial revaluation of the pension fund.
 - ongoing commitments, arising in part, from initiatives that have previously been funded from specific grants.
 - achieving budgeted savings from outsourcing, shared services and service reviews.
 - the likely passporting of some Government departmental savings targets to councils.

RISKS	PROBABILITY HIGH (H) MEDIUM (M) LOW (L)	IMPACT HIGH (H) MEDIUM (M) LOW (L)	MITIGATING ACTIONS
<p style="text-align: center;">Strategic Risks</p> <p>The absence of a robust Medium Term Financial Strategy could adversely affect the Council’s budget and resource planning and projections.</p> <p>Failure to understand changing community needs and customer expectations can result in the Council providing levels of service which are not appropriately aligned to the needs of communities and customers.</p> <p>Local Government funding is under continuous pressure and review. Failure to respond to these funding pressures may adversely impact on the Council’s ability to service delivery.</p> <p>Budget pressures arising from housing, economic, social and other demographic changes.</p> <p style="text-align: center;">Financial</p> <p>Uncertain medium term sustainability of incentivised income areas subject to Government policy, economic factors, and revaluation e.g. Brexit, business rates and New Homes Bonus.</p>	<p style="text-align: center;">L</p> <p style="text-align: center;">M</p> <p style="text-align: center;">H</p> <p style="text-align: center;">H</p> <p style="text-align: center;">H</p>	<p style="text-align: center;">H</p> <p style="text-align: center;">H</p> <p style="text-align: center;">H</p> <p style="text-align: center;">H</p> <p style="text-align: center;">H</p>	<p>Continually monitor and refine the strategy in line with changing influences. Updates to the Corporate Leadership Team and Cabinet.</p> <p>Continuously engage with key stakeholders and take advantage of existing consultation methodologies. Continue to monitor and more closely align service levels to demand and need.</p> <p>Take advantage of the Council’s growth opportunities to reduce dependency on government funding. Align service delivery to funding levels, improve exist strategy to minimise risk.</p> <p>Take advantage of technological advancements to understand and reduce unit costs, monitor demand for services and proactively manage resourcing requirements, invest in schemes to promote skills and developments.</p> <p>Constantly monitor information and update risk appraisals and financial projections. Provide timely briefings and updates to Members/ key stakeholders to facilitate decision making. Adopt prudent budgeting approach not placing undue reliance on uncertain funding sources.</p>

RISKS	PROBABILITY HIGH (H) MEDIUM (M) LOW (L)	IMPACT HIGH (H) MEDIUM (M) LOW (L)	MITIGATING ACTIONS
Uncertainty surrounding the Government's change agenda including, business rates and welfare reform over the medium term.	H	H	Constantly monitor information from Government and update risk appraisals and financial projections. Provide timely briefings and updates to Members/ key stakeholders to facilitate decision making. Lobby through the LGA as appropriate.
Budget pressures from demand led services and income variances reflecting the wider economy.	H	H	Monitor pressures throughout the budget process and take timely actions.
Interest rate exposure on investments and borrowing.	H	M	Review cash flows, ensuring the Council has a flexible and forward looking Treasury management policy.
<p style="text-align: center;">Information</p> <p>The Council itself has no influence over the outcome of some of the other bigger assumptions such as formula grant, national pay awards, interest rates, inflation and statutory fees and charges.</p>	H	M	Key assumptions made are regularly reviewed from a variety of sources. Forecasts are updated as necessary.
<p style="text-align: center;">Operational</p> <p>The Council has entered into strategic partnerships and contracts and is therefore susceptible to economic, social and demographic changes.</p>	L	M	Effective negotiation, sound governance arrangements and reviews of partnerships performance.
There is a potential risk to the Council if there is a financial failure of an external organisation, providing services to the public on behalf of the Council.	L	M	Ensure rigorous financial evaluations are carried out at tender stage. Consideration of processes to ensure annual review of the successful organisation and review any external auditor comments.

RISKS	PROBABILITY HIGH (H) MEDIUM (M) LOW (L)	IMPACT HIGH (H) MEDIUM (M) LOW (L)	MITIGATING ACTIONS
<p data-bbox="421 244 517 272">People</p> <p data-bbox="125 323 669 352">Loss of key skills, resources and expertise.</p> <p data-bbox="398 560 546 588">Regulatory</p> <p data-bbox="125 639 813 700">Changes of responsibility from Government can adversely impact on service priorities and objectives.</p> <p data-bbox="398 756 546 785">Reputation</p> <p data-bbox="125 836 813 896">Loss of reputation if unforeseen resource constraints result in unplanned service reductions.</p>	<p data-bbox="931 323 949 352">H</p> <p data-bbox="931 639 949 668">L</p> <p data-bbox="931 836 949 865">L</p>	<p data-bbox="1160 323 1178 352">M</p> <p data-bbox="1160 639 1178 668">L</p> <p data-bbox="1160 836 1178 865">H</p>	<p data-bbox="1312 284 2063 504">Continue to invest in staff developments, service continuity measures. Monitor succession planning. Keep staff consulted and informed. Ensure employment terms and conditions are competitive and development needs identified through 'My Conversation' programme with staff are satisfied.</p> <p data-bbox="1312 600 2033 660">Sound system of service and financial planning in place. Lobby as appropriate.</p> <p data-bbox="1312 794 2063 896">Identify and implement robust solutions in response to changes. Consult widely. Seek to achieve a prudent level of balances and reserves.</p>

Band D Equivalent Taxbase by Parish

PARISH	2023/24	2024/25	Difference
Aldeburgh	1,899.17	1,902.89	3.72
Alderton	181.06	181.41	0.35
Aldringham-Cum-Thorpe	606.00	605.16	-0.84
All Saints & St. Nicholas, St. Michael and St. Peter S E	98.83	102.04	3.21
Badingham	235.76	238.42	2.66
Barnby	214.86	216.64	1.78
Barsham and Shipmeadow	134.31	135.65	1.34
Bawdsey	198.00	210.89	12.89
Beccles	3,346.33	3,417.47	71.14
Benacre	32.02	33.00	0.98
Benhall & Sternfield	311.61	318.40	6.79
Blaxhall	112.93	114.84	1.91
Blundeston and Flixton	479.77	483.69	3.92
Blyford and Sotherton	71.90	73.14	1.24
Blythburgh	198.44	198.34	-0.10
Boulge	14.48	14.48	0.00
Boyton	62.44	62.33	-0.11
Bramfield & Thorington	197.96	199.95	1.99
Brampton with Stoven	157.53	156.57	-0.96
Brandeston	146.98	149.31	2.33
Bredfield	151.22	158.61	7.39
Brightwell, Foxhall & Purdis Farm	998.79	991.44	-7.35
Bromeswell	153.62	155.02	1.40
Bruisyard	71.81	72.50	0.69
Bucklesham	205.35	216.46	11.11
Bungay	1,668.62	1,684.00	15.38
Burgh	78.95	79.17	0.22
Butley, Capel St Andrew & Wantisden	118.69	118.26	-0.43
Campsea Ashe	155.80	156.78	0.98
Carlton Colville	2,671.88	2,667.73	-4.15
Charsfield	162.02	168.22	6.20
Chediston, Linstead Magna & Linstead Parva	157.72	153.23	-4.49
Chillesford	75.96	75.82	-0.14
Clopton	142.46	145.99	3.53
Cookley & Walpole	153.25	152.94	-0.31
Corton	588.59	590.47	1.88
Covehithe	13.92	14.14	0.22
Cransford	67.77	71.31	3.54
Cratfield	152.30	154.05	1.75
Cretingham, Hoo & Monewden	208.88	214.14	5.26

PARISH	2023/24	2024/25	Difference
Dallinghoo	82.88	81.79	-1.09
Darsham	228.14	228.12	-0.02
Debach	33.38	32.59	-0.79
Dennington	239.53	239.01	-0.52
Dunwich	85.66	92.04	6.38
Earl Soham	202.51	204.48	1.97
Easton	178.23	178.05	-0.18
Eyke	151.75	152.82	1.07
Felixstowe	8,771.40	8,887.28	115.88
Flixton, St. Cross S E & St. Margaret South Elmham	167.77	166.69	-1.08
Framlingham	1,644.19	1,643.45	-0.74
Friston	208.50	209.85	1.35
Frostenden, Uggeshall and South Cove	172.91	171.31	-1.60
Gisleham	248.94	255.05	6.11
Great Bealings	133.06	132.40	-0.66
Great Glemham	102.19	102.77	0.58
Grundisburgh & Culpho	655.32	664.40	9.08
Hacheston	165.66	180.03	14.37
Halesworth	1,808.83	1,850.61	41.78
Hasketon	186.36	179.69	-6.67
Hemley	26.41	26.73	0.32
Henstead with Hulver Street	138.11	140.35	2.24
Heveningham	61.42	60.34	-1.08
Hollesley	507.88	519.48	11.60
Holton	311.80	310.83	-0.97
Homersfield	59.58	60.97	1.39
Huntingfield	79.71	82.87	3.16
Iken	61.93	62.14	0.21
Kelsale-cum-Carlton	413.65	428.92	15.27
Kesgrave	4,826.19	4,843.74	17.55
Kessingland	1,439.26	1,449.86	10.60
Kettleburgh	108.33	108.03	-0.30
Kirton & Falkenham	557.47	557.16	-0.31
Knodishall	311.92	310.50	-1.42
Leiston	1,957.72	1,987.29	29.57
Letheringham	42.41	42.52	0.11
Levington & Stratton Hall	125.14	122.81	-2.33
Little Bealings	216.46	217.01	0.55
Little Glemham	66.78	69.89	3.11
Lound	127.74	134.89	7.15
Lowestoft	12,926.07	13,032.78	106.71
Marlesford	90.73	89.38	-1.35
Martlesham	2,142.72	2,151.28	8.56
Melton	1,945.62	1,928.05	-17.57

PARISH	2023/24	2024/25	Difference
Mettingham	83.98	89.24	5.26
Middleton	209.69	211.66	1.97
Mutford	186.40	189.39	2.99
Nacton	341.61	340.43	-1.18
Newbourne	112.65	113.73	1.08
North Cove	149.77	152.53	2.76
Orford & Gedgrave	401.90	396.59	-5.31
Otley	327.59	331.12	3.53
Oulton	1,654.14	1,704.08	49.94
Oulton Broad	3,307.43	3,316.03	8.60
Parham	131.13	129.53	-1.60
Peasenhall	245.78	248.41	2.63
Pettistree	87.12	85.36	-1.76
Playford	110.97	112.10	1.13
Ramsholt	12.22	13.72	1.50
Redisham	61.82	62.51	0.69
Rendham	127.13	129.08	1.95
Rendlesham	941.76	955.48	13.72
Reydon	1,196.49	1,199.79	3.30
Ringsfield and Weston	221.74	228.08	6.34
Rumburgh	120.07	119.69	-0.38
Rushmere	34.13	33.81	-0.32
Rushmere St Andrew	2,607.03	2,617.95	10.92
Saxmundham	1,609.94	1,607.64	-2.30
Saxtead	126.45	127.65	1.20
Shadingfield, Sotterley, Willingham and Ellough	182.31	178.58	-3.73
Shottisham	83.44	86.44	3.00
Sibton	96.50	100.30	3.80
Snape	332.72	343.20	10.48
Somerleyton, Ashby & Herringfleet	163.68	163.51	-0.17
Southwold	1,100.22	1,081.77	-18.45
Spexhall	85.54	84.74	-0.80
St. Andrew Ilketshall	116.03	114.63	-1.40
St. James South Elmham	91.17	90.95	-0.22
St. John Ilketshall	20.25	20.25	0.00
St. Lawrence Ilketshall	61.83	63.26	1.43
St. Margaret Ilketshall	70.34	69.85	-0.49
Stratford St Andrew and Farnham	140.49	142.35	1.86
Sudbourne	186.37	187.33	0.96
Sutton	150.97	151.37	0.40
Sutton Heath	374.89	326.79	-48.10
Sweffling	98.89	98.57	-0.32
Swilland & Witnesham	427.46	431.03	3.57
Theberton	150.78	153.41	2.63

PARISH	2023/24	2024/25	Difference
Trimley St Martin	767.41	831.14	63.73
Trimley St Mary	1,268.02	1,279.25	11.23
Tuddenham St Martin	159.80	160.56	0.76
Tunstall	256.12	258.42	2.30
Ubbeston	45.10	46.33	1.23
Ufford	406.54	402.68	-3.86
Walberswick	375.63	374.70	-0.93
Waldringfield	255.28	259.56	4.28
Wangford with Henham	258.05	259.26	1.21
Wenhaston with Mells Hamlet	421.36	417.08	-4.28
Westerfield	248.51	250.33	1.82
Westhall	136.42	133.70	-2.72
Westleton	308.17	308.62	0.45
Wickham Market	829.10	842.92	13.82
Wissett	127.62	126.39	-1.23
Woodbridge	3,389.95	3,378.86	-11.09
Worlingham	1,298.40	1,296.33	-2.07
Wrentham	379.37	385.24	5.87
Yoxford	357.01	358.28	1.27
East Suffolk Council - Total	90,340.92	91,018.73	677.81

NHB RESERVE SUMMARY 2023/24 TO 2027/28

NHB Reserve	2023/24	2024/25	2025/26	2026/27	2027/28
	Budget	Budget	Budget	Budget	Budget
	£'000	£'000	£'000	£'000	£'000
NHB Reserve Balance Brought Forward	(5,438)	(3,919)	(3,078)	(1,818)	(682)
NHB In-Year Funding	(447)	(650)	0	0	0
Total NHB Funding in Reserve	(5,885)	(4,569)	(3,078)	(1,818)	(682)
Application of NHB					
Enabling Communities Budget					
55 Councillors * £7.5k	475	412	412	412	0
Ease the Squeeze	0	0	0	0	0
	475	412	412	412	0
Community Partnerships					
8 Partnership * £25k each	295	200	200	200	0
<i>Resourcing & Engagement</i>	0	0	0	0	0
CP Manager	71	74	75	76	0
Communities Officer	25	0	0	25	0
Funding Officer	25	0	0	0	0
Venues for meetings	2	3	3	3	0
Contribution to Suffolk Association Local Councils	10	10	10	10	0
Contribution to Community Action Suffolk	10	10	10	10	0
	439	297	298	324	0
Strategic Community Partnerships - Allocated	298	0	0	0	0
Strategic Community Partnerships - Unallocated	300	300	300	300	0
	598	300	300	300	0
WIFI Implementation on Market Towns	61	37	0	0	0
Economic Development Towns Fund	0	0	0	0	0
Lowestoft Full Fibre project	19	0	0	0	0
UCI World Masters Cycle Cross Championships	0	0	0	0	0
Cultural Development	72	0	0	0	0
First Light Festival	180	170	50	0	0
Safeguarding Officer	13	8	0	0	0
Empty Homes Officer	83	85	50	0	0
Anti Social Behaviour	0	80	0	0	0
Anti Social Behaviour additional requirement	0	2	150	100	50
Communities Help Hub - Adults/Families	0	7	0	0	0
Communities Help Hub - Money	7	83	0	0	0
Place Based initiatives					
Lowestoft Rising	20	10	0	0	0
Total NHB use for the Year	1,966	1,491	1,260	1,136	50
NHB Reserve Balance Carried Forward	(3,919)	(3,078)	(1,818)	(682)	(632)

MTFS Update	2024/25 £'000	2025/26 £'000	2026/27 £'000	2027/28 £'000	Total over MTFS period £'000	Comments
Forecast Budget Gaps February 2023	3,511	6,008	6,405	6,405		
<u>Additional Cost</u>						
Green Light Trust (approval TBC)	110	0	0	0	110	Contribution to the Green Light Trust to assist the completion of its Eco Hemp Construction Centre
Coastal Protection/Drainage	198	9	18	28	253	Repairs & maintenance works for Coastal Protection to catch up with health and safety work programme
Communities - Service Level Agreements to Community, Faith & Social Enterprise Organisations	44	44	44	44	176	Funding increase for Voluntary, Community, Faith and Social Enterprise (VCFSE) organisations integral to delivery of the Council's 'tackling inequalities' ambitions
Contaminated Land	50	0	0	0	50	Environmental Protection investigative works for sites identified
Economic Regeneration	153	747	0	0	900	ESC contribution to the restoration and redevelopment of former Lowestoft Town Hall into a community, heritage and events space to be funded from the business rates equalisations reserve
Anti-Social Behaviour	162	165	168	172	667	Continuation of staffing support to ensure this area is sufficiently supported to meet demand
Estimated Inflation pressure	200	200	200	200	800	Contingency for on-going inflation pressures
Housing Benefit Subsidy Loss	100	100	100	100	400	Pressure from temporary accommodation
HRA Support recharge	204	185	178	137	704	Review of support recharges - Choice Based Lettings revised increasing General Fund use of the service
Insurance Renewal	204	229	246	273	952	Inflationary increase

MTFS Update	2024/25 £'000	2025/26 £'000	2026/27 £'000	2027/28 £'000	Total over MTFS period £'000	Comments
Internal Drainage Board	30	36	47	58	171	Inflationary increase
Lowestoft Temporary Flood Barrier	25	25	25	25	100	Lowestoft Temporary Flood Barrier training and strategy
Miscellaneous Property - East Point Pavilion	116	103	51	14	284	East Point Pavilion revised model of operation
Miscellaneous Property - Survitec	33	0	0	0	33	Planning Fees for decontamination
Property Planned Maintenance	165	0	0	0	165	Works deferred from 2023-24
Training Budget	110	110	110	110	440	Corporate training
Utilities - Electricity	87	85	85	85	342	Increases arising from footway lighting
Establishment Staffing Changes	1,113	1,101	1,306	1,165	4,685	Establishment changes
Annual Pay award assumption	0	0	0	765	765	Roll over establishment base position
Pay Award 2023/24	720	735	750	765	2,970	Additional cost over and above current budget assumption
Pay Award 2024/25	380	390	395	400	1,565	Contingency for 2024/25 pay award to excess current budget assumption
	4,204	4,264	3,723	4,341	16,532	
<u>Additional Income</u>						
Admin Buildings	(148)	(148)	(148)	(148)	(592)	New lease agreement for ESH Annex
Business Rates	(3,600)	(2,000)	(1,000)	(500)	(7,100)	Increasing assumptions on business rate income due to delays with reform
Car Parking Income	(30)	(30)	(30)	(30)	(120)	Income relating to penalty charge notices and off-street parking
Council Tax Income	(100)	(102)	(104)	(632)	(938)	Slight growth in tax base for 2024/25 and Council Tax assumed increase for 2024/25, and roll forward of budget for 2027/28
Council Tax Income - Council Tax Surplus	(140)	0	0	0	(140)	Collection fund surplus
Garden Waste	(27)	(27)	(27)	(27)	(108)	Green waste subscriptions (fee increase compensating for some fall in subscriptions)
Government Grant	(60)	(57)	(54)	(54)	(225)	Revenue Support Grant increase based on September 12 month inflation rate

MTFS Update	2024/25 £'000	2025/26 £'000	2026/27 £'000	2027/28 £'000	Total over MTFS period £'000	Comments
Government Grant	(650)	0	0	0	(650)	Estimated New Homes Bonus for one further year
Industrial Estates	(24)	(24)	(24)	(24)	(96)	Fountains Way Industrial Estate now fully let
Investment Interest Income	(1,441)	(901)	(932)	(776)	(4,050)	Anticipating investment rates to remain high, net of HRA share
Martello Café	(45)	(45)	(45)	(45)	(180)	New lease agreement
Miscellaneous Property	(83)	(83)	(83)	(83)	(332)	Increase in occupancy over the original budget for Business Centres in Leiston and Lowestoft
Planning Application Fees	(376)	(274)	(100)	(100)	(850)	Statutory fee increase and Sanyo/Survitec (HRA contribution in 2024/25 and 2025/26)
Land Charges	(115)	(80)	(80)	(80)	(355)	Following some charges transferred to HMRC, the income lost has been less than original forecast
Purchase Land - Hamilton Road	(79)	(115)	(115)	(115)	(424)	New industrial estate purchased, lease income from the units
Seashore Village Beach Hut Income	(47)	(47)	(47)	(47)	(188)	New beach village in Felixstowe and increased fees and charges for beach huts
	(6,965)	(3,933)	(2,789)	(2,661)	(16,348)	
<u>Savings</u>						
Minimum Revenue Provision (MRP)	(700)	(900)	(1,400)	(1,300)	(4,300)	Reflecting capital programme changes and reduced annuity rate
Ringo admin charge	(125)	(125)	(125)	(125)	(500)	New Ringo Contract (Parking Collection and National Payment Platform)
Corporate Subscriptions	(178)	(178)	(103)	(103)	(562)	Budget savings identified across some service areas - e.g. supplies and services, subscription budgets
	(1,003)	(1,203)	(1,628)	(1,528)	(5,362)	

MTFS Update	2024/25 £'000	2025/26 £'000	2026/27 £'000	2027/28 £'000	Total over MTFS period £'000	Comments
<u>Reduced Income</u>						
Miscellaneous Property	255	255	255	255	1,020	Reduction in property lease income due to administration of Wilko
	255	255	255	255	1,020	
<u>Use of Reserves</u>						
ASB staffing funded from reserves	(160)	(150)	(100)	(50)	(460)	To work towards a reduced funding position for permanent staffing
Business Rates Equalisation	(153)	(747)	0	0	(900)	Restoration and redevelopment of Lowestoft Town Hall into a community, heritage and events space
Transformation Reserve – Environmental (approval TBC)	(110)	0	0	0	(110)	Contribution to the Green Light Trust to assist the completion of its Eco Hemp Construction Centre
Short Life Asset reserve	1,832	537	632	902	3,903	To provide a source of funding for short life asset replacement in the capital programme
Capital Reserve	150	100	0	0	250	Revenue funding towards the capital programme
Transfer of NHB to Reserve	650	0	0	0	650	Transfer of in year allocation to support community initiatives
	2,209	(260)	532	852	3,333	
Net Total of MTFS Updates December 2023	(1,300)	(877)	93	1,259	(825)	
Forecast Budget Gaps December 2023	2,211	5,131	6,498	7,664		

	Original MTFS (Feb-23) 2024/25 £	MTFS Updates (Nov-23) 2024/25 £	Forecast MTFS (Nov-23) 2024/25 £	Original MTFS (Feb-23) 2025/26 £	MTFS Updates (Nov-23) 2025/26 £	Forecast MTFS (Nov-23) 2025/26 £	Original MTFS (Feb-23) 2026/27 £	MTFS Updates (Nov-23) 2026/27 £	Forecast MTFS (Nov-23) 2026/27 £	Original MTFS (Feb-23) 2027/28 £	MTFS Updates (Nov-23) 2027/28 £	Forecast MTFS (Nov-23) 2027/28 £
Net Cost of Service	46,635,700	2,978,000	49,613,700	47,005,500	3,158,000	50,163,500	47,014,700	2,873,000	49,887,700	47,014,700	3,532,000	50,546,700
Non-Cost of Service Expenditure Adjustments												
Direct Revenue Financing (DRF)	905,000		905,000	805,000		805,000	805,000		805,000	805,000		805,000
Revenue provision for the repayment of debt (MRP)	2,754,900	(700,000)	2,054,900	3,397,800	(900,000)	2,497,800	3,922,700	(1,400,000)	2,522,700	3,922,700	(1,300,000)	2,622,700
Recharges to the Housing Revenue Account (HRA)	(1,420,900)	204,000	(1,216,900)	(1,431,100)	185,000	(1,246,100)	(1,461,700)	178,000	(1,283,700)	(1,461,700)	137,000	(1,324,700)
Bad Debt Provision	(9,300)		(9,300)	(9,300)		(9,300)	(2,900)		(2,900)	(2,900)		(2,900)
Other Accounting Adjustments	25,000		25,000	25,000		25,000	25,000		25,000	25,000		25,000
REFCUS Expenditure	(2,721,400)		(2,721,400)	(2,721,400)		(2,721,400)	(2,721,400)		(2,721,400)	(2,721,400)		(2,721,400)
Other Operating Expenditure												
Town & Parish Precepts	7,094,800		7,094,800	7,094,800		7,094,800	7,094,800		7,094,800	7,094,800		7,094,800
Levies	250,500		250,500	250,500		250,500	250,500		250,500	250,500		250,500
Financing and Investment Income and Expenditure												
Interest Payable	282,000		282,000	282,000		282,000	282,000		282,000	282,000		282,000
Interest Receivable	(1,410,000)	(1,740,000)	(3,150,000)	(1,410,000)	(1,040,000)	(2,450,000)	(1,410,000)	(790,000)	(2,200,000)	(1,410,000)	(640,000)	(2,050,000)
HRA Share of Interest Payable & Receivable	160,200	299,000	459,200	200,400	139,000	339,400	200,400	(142,000)	58,400	200,400	(136,000)	64,400
Other Financing Charges	386,300		386,300	386,300		386,300	386,300		386,300	386,300		386,300
Non-Specific Grant Income												
New Homes Bonus	0	(650,000)	(650,000)	0		0	0		0	0		0
Other non-ringfenced grants	0		0	0		0	0		0	0		0
Capital Grants	(400)		(400)	(400)		(400)	(400)		(400)	(400)		(400)
Net Budget Expenditure before Reserve Movements	52,932,400	391,000	53,323,400	53,875,100	1,542,000	55,417,100	54,385,000	719,000	55,104,000	54,385,000	1,593,000	55,978,000
Net Movements on Reserves												
General Fund Balance												
Revenue Earmarked Reserves												
Use of Reserves for Services/Projects/Corporate	(2,536,800)	227,000	(2,309,800)	(1,591,300)	(897,000)	(2,488,300)	(1,176,200)	(100,000)	(1,276,200)	(1,176,200)	(50,000)	(1,226,200)
Use of Covid-19 Reserve	(32,400)		(32,400)	0		0	0		0	0		0
Reserve Balances Not Required	0		0	0		0	0		0	0		0
Use of Reserves to Balance the Budget	0		0	0		0	0		0	0		0
Capital Reserves	92,000	1,982,000	2,074,000	192,000	637,000	829,000	192,000	632,000	824,000	192,000	902,000	1,094,000
Net Budget Expenditure After Reserve Movements	50,455,200	2,600,000	53,055,200	52,475,800	1,282,000	53,757,800	53,400,800	1,251,000	54,651,800	53,400,800	2,445,000	55,845,800

	Original MTFS (Feb-23) 2024/25 £	MTFS Updates (Nov-23) 2024/25 £	Forecast MTFS (Nov-23) 2024/25 £	Original MTFS (Feb-23) 2025/26 £	MTFS Updates (Nov-23) 2025/26 £	Forecast MTFS (Nov-23) 2025/26 £	Original MTFS (Feb-23) 2026/27 £	MTFS Updates (Nov-23) 2026/27 £	Forecast MTFS (Nov-23) 2026/27 £	Original MTFS (Feb-23) 2027/28 £	MTFS Updates (Nov-23) 2027/28 £	Forecast MTFS (Nov-23) 2027/28 £
Financed By:												
Council Tax Income (District Council)	(16,882,000)		(16,882,000)	(17,400,000)		(17,400,000)	(17,922,000)		(17,922,000)	(17,922,000)		(17,922,000)
Council Tax Income (Town & Parish Precepts)	(7,094,800)	(100,000)	(7,194,800)	(7,094,800)	(102,000)	(7,196,800)	(7,094,800)	(104,000)	(7,198,800)	(7,094,800)	(632,000)	(7,726,800)
Council Tax Surplus/Deficit on Collection Fund	0	(140,000)	(140,000)	0		0	0		0	0		0
Business Rates Income (incl. Section 31 Grant)	(20,089,000)	(3,600,000)	(23,689,000)	(19,089,000)	(2,000,000)	(21,089,000)	(19,089,000)	(1,000,000)	(20,089,000)	(19,089,000)	(500,000)	(19,589,000)
Business Rates Surplus/Deficit on Collection Fund	0		0	0		0	0		0	0		0
Business Rates - Enterprise Zone	(490,300)		(490,300)	(490,300)		(490,300)	(490,300)		(490,300)	(490,300)		(490,300)
Lower Tier Services Grant	0		0	0		0	0		0	0		0
Services Grant	(269,000)		(269,000)	(269,000)		(269,000)	(269,000)		(269,000)	(269,000)		(269,000)
Revenue Support Grant	(339,500)	(60,000)	(399,500)	(342,900)	(57,000)	(399,900)	(346,300)	(54,000)	(400,300)	(346,300)	(54,000)	(400,300)
Rural Services Delivery Grant	(260,300)		(260,300)	(262,900)		(262,900)	(265,500)		(265,500)	(265,500)		(265,500)
Funding Guarantee Allocation	(1,519,000)		(1,519,000)	(1,519,000)		(1,519,000)	(1,519,000)		(1,519,000)	(1,519,000)		(1,519,000)
Total Financing	(46,943,900)	(3,900,000)	(50,843,900)	(46,467,900)	(2,159,000)	(48,626,900)	(46,995,900)	(1,158,000)	(48,153,900)	(46,995,900)	(1,186,000)	(48,181,900)
Budget Shortfall / (Surplus)	3,511,300	(1,300,000)	2,211,300	6,007,900	(877,000)	5,130,900	6,404,900	93,000	6,497,900	6,404,900	1,259,000	7,663,900

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Policy paper

Local government finance policy statement 2024 to 2025

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Applies to England



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This publication is available at <https://www.gov.uk/government/publications/local-government-finance-policy-statement-2024-to-2025/local-government-finance-policy-statement-2024-to-2025>

Today I am setting out the government's intentions for the Local Government Finance Settlement (the 'Settlement') for 2024 to 2025. I recognise that providing councils with greater certainty on key aspects of their funding is vital for the budget setting process. In December 2022, we published a policy statement to give councils forward notice of our proposals for the 2024 to 2025 Settlement - this policy statement builds on that by providing additional details of the upcoming Settlement.

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Core Settlement

- We will increase the Revenue Support Grant in line with the Consumer Price Index (CPI) of inflation.
- We have no desire to introduce 'negative Revenue Support Grant'.
- Local authorities will see an increase in baseline funding levels (BFLs) and compensation grant as if both business rating multipliers had increased by CPI. It was announced at the Autumn Statement that the small business rating multiplier will be frozen at 49.9p, and the standard business rating multiplier will increase to 54.6p in line with the September 2022 to September 2023 change in CPI. For 2024 to 2025, BFLs will increase to reflect the uprating of the standard multiplier, and this will be done by using proxy data from the Valuation Office Agency's compiled local rating list, published on 3 April 2023. We will also compensate local authorities for the reduction in income as a consequence of the decision to freeze the small multiplier.
- The government has consulted recently on changes to the way baseline funding levels, top-ups and tariffs are uprated, as well as how to continue calculating compensation for lower than consumer price index increases to the small and standard business rates multipliers. A consultation response will be published shortly before the provisional Settlement consultation is launched.

Council tax referendum principles

The government will continue to protect local taxpayers from excessive council tax increases. The proposed package of referendum principles strikes a fair balance and is an additional local democratic check and balance. The council tax referendum provisions are not a cap, nor do they force councils to set taxes at the threshold level. These actions are to protect hard-working people from excessive tax rises.

The proposed referendum principles are:

- a core council tax referendum limit for local authorities of up to 3%;
- a council tax referendum principle of up to 3% or £5, whichever is higher, for shire district councils;
- an adult social care precept of 2% for all authorities responsible for adult social care services;
- a council tax referendum principle of £13 for police authorities;
- the core council tax principle of up to 3% will apply to fire and rescue authorities; and
- no council tax referendum principles for mayoral combined authorities or town and parish councils, but the government will review the decisions taken by these authorities when considering referendum principles in future years.
- A bespoke additional council tax flexibility of up to £20 on Band D bills for the Greater London Authority (GLA), as requested by the Mayor of London – while this request will not be opposed, the government is disappointed that London taxpayers are having to foot the bill for the GLA's poor governance and decision-making.

It is for individual local authorities to determine whether to use the flexibilities detailed above, taking into consideration the pressures many households are facing.

Social care grants

The government announced at the 2022 Autumn Statement up to £4.7 billion additional funding for social care and discharge in 2024-25. Furthermore, the Department of Health and Social Care announced £600 million of additional funding in July 2023, which includes £205 million of new grant funding for social care in 2024-25.

Including funding announced at the 2022 Autumn Statement, additional grant resources for social care in 2024-25 will therefore be as follows:

- an additional £692 million will be distributed to local authorities through the **Social Care Grant** for adult and children's social care. This will bring the overall size of the Social Care Grant to £4,544 million. We will continue to equalise against the adult social care precept in the usual way.
- an additional £200 million will be distributed in 2024 to 2025 through the **Discharge Fund** to support timely and safe discharge from hospital into the community by reducing the number of people delayed in hospital awaiting social care. This will bring the overall size of the local authority component of the Discharge Fund to £500 million.
- the Discharge Fund will be in addition to the existing improved **Better Care Fund**, for which the quantum of £2,140 million and the distribution will remain the same as in 2023-24.
- £1,050 million in 2024 to 2025 will be distributed for adult social care through the **Market Sustainability and Improvement Fund (MSIF)**, which continues to include £162 million per year of Fair Cost of Care funding. It also includes £205 million MSIF - Workforce Funding, a 2-year fund announced in July 2023 which will be rolled into the existing MSIF. In total, the combined MSIF and MSIF Workforce Fund are worth £123 million more than in 2023 to 2024.

For 2023 to 2024, the government set an expectation that the additional funding made available to adult social care should lead to a substantial increase in planned adult social care spending, given the additional resources which were made available in

that year. The Department of Health and Social Care will continue to monitor local authority budgeting and expenditure in 2024 to 2025, with an expectation that the following will be allocated to adult social care:

- an appropriate share of the local authority's additional Social Care Grant allocation for 2024 to 2025, in line with aggregate use of this funding in previous years
- the local authority's share of the 2024 to 2025 MSIF and Discharge Fund
- the resources raised in 2024 to 2025 from the adult social care precept
- we also expect local authorities to make use of the increase in income from unhypothecated sources. We expect spending on adult social care will increase by a necessary share of this income.

There will continue to be grant conditions placed on these grants regarding performance and use of funding to support improvement against these objectives.

Remaining Settlement grants

- The government continues to recognise the importance of protecting the funding position of councils as far as possible. In recognition of pressures across the sector, we will continue to ensure that all authorities will see at least a 3% increase in their Core Spending Power before any decision they make about organisational efficiencies, use of reserves, and council tax levels through a Funding Guarantee.
- There will be new rounds of New Homes Bonus (NHB) payments in 2024 to 2025. In line with last year, these payments will not attract new legacy payments. NHB allocations for 2024 to 2025 will continue to be paid for in the usual way, applying the same the calculation process as in 2023 to 2024.
- The Rural Services Delivery Grant will continue as in 2023 to 2024.
- As with last year, the Services Grant will reduce in 2024 to 2025 and the remainder will continue to be distributed by the Settlement Funding Assessment distribution

methodology.

Other areas of the Settlement

- We will be consolidating the Home Office's Fire and Pensions Grant, worth £115 million, into the Revenue Support Grant. This grant will maintain its existing distribution.
- All current enhanced business rates retention areas will continue for 2024 to 2025. During this time the government will continue to review the role of such arrangements as a source of income for areas and its impact on local economic growth, and as part of deeper devolution commitments as set out in the Levelling Up White Paper.
- Where requested, we will proceed with business rates pooling for 2024 to 2025.
- The government asks authorities to continue to consider how they can use their reserves to maintain services over this and the next financial year, recognising that not all reserves can be reallocated, and that the ability to meet spending pressures from reserves will vary between authorities.
- The government continues to explore ways to move councils away from establishing '4 day working week' practices, as they do not represent good value for taxpayers' money. In the meantime, those councils operating or considering a 4 day working week pattern should stop.
- The Statutory Override for the Dedicated Schools Grant will continue until 31 March 2026.
- Where possible, councils should invest in areas that help place children's social care services on a sustainable financial footing. This includes investment in expanding family help and targeted early intervention, expanding kinship care, and boosting the number of foster carers.

- The National Minimum Allowance (NMA) for foster carers is routinely uplifted each year, taking into account changes in inflation and what is affordable for local government. We have uplifted the NMA by 6.88% for this financial year and full details will be published on Gov.UK.
- Government will work closely with councils to increase transparency around the costs of residential placements for children, as a precursor to wider commissioning and market shaping reforms being rolled out through Regional Care Co-Operatives.
- The Exceptional Financial Support framework is available to provide support where a council has a specific and evidenced concern about its ability to set or maintain a balanced budget, including where there has been local financial failure. Where councils need additional support from government, they should take every possible step to minimise the need for that support to be funded by national taxpayers. As part of that process, the government will consider representations from councils, including on council tax provision.

Technical adjustment to the business rates retention system

- Last year, the government consulted on its proposed approach to a technical adjustment to the business rates retention system in response to the 2023 revaluation and transfers of properties from local lists to the central list. This work delivered on the commitment made at the outset of the business rates retention system, that at revaluations it would adjust local authorities' income to ensure that as far as practicable it is no more, or less, than it would have been had the revaluation not taken place.
- The initial adjustment was implemented in 2023 to 2024, and the government intends to continue with this modified revaluation adjustment for the 2024 to 2025 Settlement, with the methodology and adjustments to tariffs and top-ups published alongside the provisional Settlement.

- Adjustments will account for compiled rating list data for the 2023 list as at 1 April 2023, and for outturn business rates data for 2022 to 2023. The final adjustment will occur at the 2025 to 2026 Settlement. The government will continue to keep the revaluation adjustment under review.

Reform

- The government remains committed to improving the local government finance landscape in the next Parliament.
- At the 2023 to 2024 Settlement, we heard calls from the sector for stability. Now is not the time for fundamental reform, for instance implementing the Review of Relative Needs and Resources or a reset of accumulated business rates growth. This continues to be the government's position.

Funding outside the Settlement – public health funding

- In addition to the core Settlement, local authorities will continue to receive funding to provide a range of public health services. Indicative allocations for the Public Health Grant in 2024 to 2025 [have been published](https://www.gov.uk/government/publications/public-health-grants-to-local-authorities-2023-to-2024) (<https://www.gov.uk/government/publications/public-health-grants-to-local-authorities-2023-to-2024>) and will continue to increase to nearly £3.6 billion. Further specific investment will continue to improve the start for life offer and support improvements in the quality and capacity of drug and alcohol treatment. We are also providing a further £70 million per year from 2024/25 to support local authority-led efforts to stop smoking. This total funding package will deliver a real terms increase of more

than 7% in DHSC investment in local authority public health functions over the 2 years 2023 to 2024 and 2024 to 2025.

Next steps

We will set out further detail on measures in the Settlement, including allocations, and consult on them at the provisional Settlement later this calendar year before the House rises for the Christmas recess. We will then consider responses to the consultation, before publishing a final Settlement in the new year.

The Settlement measures above are therefore subject to change following the consultation. In previous years, we have made changes following the provisional Settlement consultation. In recent years these changes have included very small adjustments to New Homes Bonus allocations following updated data, and uplifts grants such as the Rural Services Delivery Grant.

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Local Government Finance Policy Statement 2024-25

Settlement component	2024-25
Locally retained business rates - baseline funding levels	<ul style="list-style-type: none"> Local authorities will see an increase in baseline funding levels (BFLs) and compensation grant as if both business rating multipliers had increased by Consumer Price Index of inflation
Locally retained business rates - Under indexation	<ul style="list-style-type: none"> Increase to compensate for the difference between the business rate multipliers and the consumer price index of inflation
Revenue Support Grant	<ul style="list-style-type: none"> Increase by the Consumer Price Index of inflation Roll the £115m fire pension grant into the Revenue Support Grant. This grant will maintain its existing distribution.
Council Tax	<ul style="list-style-type: none"> A core council tax referendum limit for local authorities of up to 3% A council tax referendum principle of up to 3% or £5, whichever is higher, for shire district councils An adult social care precept of 2% for all authorities responsible for adult social care services A bespoke additional council tax flexibility of up to £20 on Band D bills for the Greater London Authority A council tax referendum principle of £13 for police authorities The core council tax principle of up to 3% will apply to fire and rescue authorities No council tax referendum principles for Mayoral Combined Authorities or town and parish councils
Social Care Grant	<ul style="list-style-type: none"> Increase by £692m to £4,544m
Discharge Fund	<ul style="list-style-type: none"> Increase by £200m to £500m
Improved Better Care Fund	<ul style="list-style-type: none"> No change at £2,140m
Market Sustainability and Improvement Fund (MSIF)	<ul style="list-style-type: none"> Increasing to £845m and combining with MSIF – Workforce Fund (£205m in 24/25) increases the total value to £1,050m
Funding Guarantee	<ul style="list-style-type: none"> Ensure all authorities see a 3% core spending power increase before any decision on organisational efficiencies, use of reserves, and council tax levels
New Homes Bonus	<ul style="list-style-type: none"> Maintain the 2023-24 approach, making 2024-25 in-year payments only
Rural Services Delivery Grant	<ul style="list-style-type: none"> No change at £95m

Services Grant	<ul style="list-style-type: none">• As in 2023-24, the Services Grant will reduce and the remainder will continue to be distributed using the Settlement Funding Assessment distribution methodology
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PROVISIONAL LOCAL GOVERNMENT FINANCE SETTLEMENT 2024/25

1 OVERVIEW

- 1.1 On 5 December 2023, a Policy Statement announced the key principles that ministers intended to use in the provisional settlement:

<https://www.gov.uk/government/publications/local-government-finance-policy-statement-2024-to-2025>

<https://questions-statements.parliament.uk/written-statements/detail/2023-12-05/hcws95>

- 1.2 The Policy Statement gave local authorities advanced notice of the principles that ministers would use in the 2024/25 local government finance settlement.
- 1.3 The Government published the Provisional Local Government Finance Settlement for 2024/25 on 18 December 2023 and now provides financial values to the principals set out in the Policy Statement:

<https://www.gov.uk/government/collections/provisional-local-government-finance-settlement-england-2024-to-2025>

<https://questions-statements.parliament.uk/written-statements/detail/2023-12-18/hcws148>

- 1.4 There is a consultation on the provisional settlement which runs for four weeks and the government is seeking views by 15 January 2024.
- 1.5 The final 2024/25 settlement is expected to be laid before the House of Commons, for its approval, in late January or early February 2024.
- 1.6 Other than another year of New Homes Bonus, the overall position on other funding presents no significant change in financial terms to the Council from the February 2023 MTFS position for next year. The most significant change to the Council is the complete removal of the Services Grant which has been compensated for with increases in other grants.

2 COUNCIL TAX

- 2.1 The Government has confirmed the following referendum principles for 2024/25;

- Shire districts will have a referendum principle of up to 3 per cent or £5, whichever is higher. No change from the Policy Statement or from last year.
- Social care authorities will be able to set a 2 per cent adult social care precept without a referendum (in addition to the existing basic referendum threshold referred to above).
- £13 for police authorities and police and crime commissioners.
- No referendum principles will be set for parish and town councils.

3 **BUSINESS RATES RETENTION SCHEME (BRRS)**

- 3.1 The Non-Domestic Rating Act 2023 gives ministers the power to set the small and standard business rating multipliers separately from one another.⁵ Until 2023-24, these two multipliers had to be increased by the same percentage.
- 3.2 In last month's Autumn Statement, the Chancellor decided to use this new power in 2024/25. The small business rating multiplier will be frozen (it will remain at 49.9p). The standard multiplier (payable by businesses with premises valued at more than £51,000) will increase from 51.2p to 54.6p. Until 2024/25, the standard multiplier was fixed at 1.3p higher than the small multiplier; in 2024-25 it will be 4.7p higher.
- 3.3 To date, the BRRS has been linked to the small multiplier (49.9p): all the baselines have been uplifted using the change in the small multiplier, and the cap compensation fraction has been calculated with reference only this multiplier. Now that the two multipliers are increasing by different amounts (and this is likely to continue in the future), the baselines will have to be indexed differently. The government is proposing that "a weighted average, specific to each authority, will be used to index" baselines and tariffs and top-ups (and T/TUs).
- 3.4 Business Rates pooling and pilots will continue in 2024/25, and Suffolk Chief Finance officers have received a letter from DLUHC confirming that the Suffolk Business Rates Pool will operate in 2024/25.
- 3.5 Business rates and Section 31 Grant estimates for 2024/25 that are currently included in the General Fund Budget and MTFS will be revised following confirmation of relevant details in the Settlement and will be based on the NNDR1 return to Government, which is due to be completed by 31 January 2024.

4 **FUNDING**

4.1 **Revenue Support Grant (RSG)**

Methodology for RSG has not changed, and for 2024/25 RSG will increase at 6.62% (September CPI). There will continue to be no adjustment for "negative RSG". Family Annex Council Tax Discount Grant and LCTS Administration Subsidy grant have again been rolled into RSG in 2024/25.

4.2 **New Homes Bonus (NHB)**

New Homes Bonus (NHB) will continue for one year, but there will be no more legacy payments. This is the fifth year of one year NHB allocations and likely to be the final year, but it is not yet clear what a replacement system will look like.

4.3 **3% Funding Guarantee**

The 3% Funding Guarantee was introduced in 2023/24 to ensure that no council has less than 3 per cent increase in their Core Spending Power before any decisions about organisational efficiencies, use of reserves or council tax levels. The funding is set to continue for 2024/25.

4.4 **Services Grant**

In the December 2022 Policy Statement, ministers said that the core grants would “continue as they are now” in 2024/25. By implication, this included the Services Grant. In the Policy Statement earlier this month, there were some indications that ministers were considering making cuts to Services Grant – but nothing was made explicit. However in the Provisional Settlement this grant has been cut significantly. This appears to have been used to fund increases to other settlement grants and equalisation of the adult social care precept. The government also intends to hold a small proportion of the grant back as a contingency for unexpected costs between the provisional and final settlement. This grant has been removed completely for the Council in the Provisional Settlement.

4.5 **Rural Services Funding**

This grant has continued for 2024/25 using the same methodology recognising the additional costs rural areas face.

4.6 **Capital Receipts**

Flexibilities over the use of capital receipts will be extended to March 2030.

4.7 **Funding Summary**

A summary of the funding changes (excluding any Business Rate measures) arising from the settlement compared with the assumptions in the February 2023 MTFS is shown in the table below.

East Suffolk Council

Provisional Local Government Finance Settlement 2024/25 (One Year Settlement) – Funding Allocations

Funding Allocations	ESC February 2023 MTFS 2024/25 £	DLUHC Provisional Settlement 18-Dec-23 2024/25 £	Funding Change between February 2023 MTFS assumptions and the Provisional Settlement (Additional)/Less Grant Income 2024/25 £	Comments
Services Grant	(269,000)	0	269,000	This grant has been reduced in part due to the removal of funding for the National Insurance increase and to pay for other parts of the settlement such as Revenue Support Grant.
Revenue Support Grant (RSG)	(339,500)	(750,800)	(411,300)	Provisional Settlement includes - 2023/24 RSG increased by 6.62% (£59,200) to £398,700, plus other grants rolled into RSG. This includes the Family Annexe Council Tax Grant and Local Council Tax Scheme Administration Grant, totalling £352,100.
Rural Services Delivery Grant	(260,300)	(291,000)	(30,700)	Roll forward of the 2023/24 grant with a 11.8% increase.
Local Council Tax Scheme Admin Subsidy Grant	(267,600)	0	267,600	The provisional settlement proposes to roll this grant into the Revenue Support Grant above for 2024/25.
Funding Guarantee Allocation	(1,519,000)	(1,630,400)	(111,400)	This funding was introduced last year to ensure that all councils will see at least a 3% increase in their core spending power before any decisions about organisational efficiencies, use of reserves or council tax levels.
New Homes Bonus	0	(651,300)	(651,300)	Another one year allocation.
Total	(2,655,400)	(3,323,500)	(668,100)	

Source: <https://www.gov.uk/government/collections/provisional-local-government-finance-settlement-england-2024-to-2025>



CABINET

Tuesday, 02 January 2024

Subject	Capital Programme 2023/24 to 2027/28
Cabinet Member	Councillor Vince Langdon-Morris Cabinet Member with responsibility for Resources and Value for Money
Report Author(s)	Julian Sturman Specialist Accountant – Capital & Treasury Management julian.sturman@eastsoffolk.gov.uk
Head of Service	Lorraine Rogers Chief Finance Officer and Section 151 Officer lorraine.rogers@eastsoffolk.gov.uk
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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 disclose the exempt information.	Not applicable
Wards Affected:	All Wards

Purpose and high-level overview

Purpose of Report:

As part of the budget setting process, the Council is required to agree a programme of capital expenditure for the coming four years. The capital programme plays an important part in the delivery of the Council's Medium-Term Financial Strategy (MTFS), which in turn supports wider service delivery. The report sets out the Council's capital programme including revisions to the current programme for the financial years 2023/24 to 2027/28. This report also forms the basis of Scrutiny Committee's review of the Budget at its meeting on 18 January 2024 as required under the Budget and Policy Framework.

Options:

The capital programme forms part of the Council's Budget and Policy Framework. The Council is required to set an annual budget and therefore no other options have been considered.

Recommendation/s:

1. That the General Fund capital programme for 2023/24 to 2027/28 including revisions as shown in **Appendix B** be approved for review and consideration by the Scrutiny Committee as part of the budget process.
2. That the Housing Revenue Account capital programme for 2023/24 to 2027/28 including revisions as shown in **Appendix G** be approved for review and consideration by the Scrutiny Committee as part of the Budget process.

Corporate Impact Assessment

Governance:

As set out in the Council's Financial Procedure Rules, the Chief Finance Officer is responsible for preparing and submitting capital budgets to Cabinet and Council.

The 2023/24 budget has/will be considered at the following Council meetings:

- Cabinet 2 January 2024
- Scrutiny Committee 18 January 2024
- Cabinet 6 February 2024
- Full Council 21 February 2024

ESC policies and strategies that directly apply to the proposal:

- East Suffolk Council Strategic Plan
- East Suffolk Council Medium Term Financial Strategy
- East Suffolk Council Treasury Management Strategy and Treasury Management Policy
- East Suffolk Council Capital Strategy
- Annual Governance Statement
- Financial Procedure Rules

Environmental:

All projects in the Programme are intended to contribute to the Strategic Plan Priority of environmental impact.

Equalities and Diversity:

No direct impact from this report. Where subsequent individual business cases are presented, Equality Impact Assessments are prepared.

Financial:

All capital expenditure must be financed, either from external sources (Government grants and other contributions), the Council's own resources (revenue, reserves, and capital receipts) or debt (borrowing and leasing). Debt is only a temporary source of finance, since loans and leases must be repaid, and this is therefore replaced over time by other financing, usually from revenue which is known as "Minimum Revenue Provision" (MRP). Alternatively, proceeds from selling capital assets (known as capital receipts) may be used to replace debt finance.

The Council's cumulative outstanding amount of debt finance is measured by the Capital Financing Requirement (CFR). This increases with new debt-financed capital expenditure and reduces with MRP. The CFR is expected to increase by £156.94m between 2023/24 and 2027/28 which is due to capital projects being financed through borrowing. Statutory guidance is that debt should remain below the CFR.

The Council expects to comply with this in the medium term, but the scale of the capital programme as currently drafted is such that the Council would begin to approach its borrowing limits over the life of the proposed programme if other sources of finance were not available. The programme as presented does not pre-empt the realisation of capital receipts and only those receipts already received will be used as financing.

In addition, external funding is expected to be secured in respect of other major projects in the Programme, assisting the overall position and the ability of the Council to deliver on its Strategic Plan.

Human Resources:

No impacts directly arising from this report.

ICT:

No impacts directly arising from this report.

Legal:

No impacts directly arising from this report.

Risk:

No impact directly arising from this report.

External Consultees:

External consultation has been conducted on a range of individual projects and programmes within the overall Capital Programme, and a number of programmes such as the Lowestoft Flood Risk Management Project and the Lowestoft Town Investment Plan feature programme boards which include key external stakeholders as part of their governance arrangements. The Scrutiny Committee will also consider the Capital programme as part of the budget process at its meeting on 18 January 2024.

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 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 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 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 checked="" type="checkbox"/>
P16	Lean and efficient streamlined services	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>
P21	Minimise waste, reuse materials, increase recycling	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P22	Renewable energy	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>
How does this proposal support the priorities selected?			
The Capital programme forms part of the Council's Budget and Policy Framework and outlines the Council's capital investment in the assets, services, and infrastructure of the district in accordance with the key priorities and objectives of the Strategic Plan.			

Background and Justification for Recommendation

1 Background facts	
1.1	<p>The Capital programme feeds directly into the Council's MTFS which in turn is the mechanism by which the key Strategic Plan objective of Financial Sustainability will be delivered over the medium term. The Capital programme contributes directly to the Council's specific actions within the Strategic Plan and identifies the financing for these projects.</p>
2 Current position	
2.1	<p>Capital expenditure within the Council is split into two main components, the General Fund Capital programme, and the Housing Revenue Account (HRA) Capital programme.</p> <p>The capital programme has been compiled taking account of the following main principles, to:</p> <ul style="list-style-type: none">• maintain an affordable four-year rolling capital programme.• ensure capital resources are aligned with the Council's Strategic Plan,• maximise available resources by actively seeking external funding and disposal of surplus assets; and• not to anticipate receipts from disposals until they are realised
2.2	<p>General Fund Capital Programme Summary</p> <p>Capital expenditure relates to the acquisition of fixed assets or expenditure that adds to (and not merely maintains) the value of an existing fixed asset.</p> <p>Following the review and revisions to programme by project officers the revised capital programme has been reviewed by the Corporate Leadership Team (CLT) along with the Chief Finance Officer and is presented at:</p> <ul style="list-style-type: none">• Appendix A: - General Fund Capital Programme 2023/24 to 2027/28 Summary, shows a summary of the capital programme and planned financing.• Appendix B: - General Fund Capital Programme Revisions 2023/24 to 2027/28, shows budget revisions to previously approved projects.• Appendix C: - General Fund Capital Programme 2023/24 to 2027/28 extract of budget increases greater than £0.500m and budget decreases greater than £0.500m.• Appendix D: - General Fund Capital Programme 2023/24 to 2027/28 new projects, shows the new projects being recommended for approval and inclusion within the existing programme as shown in Appendix B.• Appendix E: - General Fund Capital Programme 2023/24 to 2027/28 extract of externally funded projects, is an extract of the programme showing all projects which are subject to external grants/contributions.

2.3	<p>The General Fund capital programme for 2023/24 through to 2027/28 has a total financing requirement of £329.03m which will be financed through both internal and external resources.</p> <p>The programme from 2023/24 to 2027/28 benefits from £211.08m (64%) of external grants and contributions, the use of £13.85m (4%) of reserves and internal/external borrowing of £104.10m (32%).</p> <p>Where projects have identified external funding, if this is not secured then those projects will look to secure other funding or will not be pursued. Similarly, where projects require significant borrowing in excess of £3m, these will require robust business cases to underpin the investment. The project business case should be presented to Council for approval prior to the borrowing being secured.</p> <p>Housing Revenue Account (HRA) Capital Programme Summary</p> <p>Capital expenditure relates to the acquisition of fixed assets or expenditure that adds to (and not merely maintains) the value of an existing fixed asset.</p> <ul style="list-style-type: none"> • Appendix F: - HRA Capital Programme 2023/24 to 2027/28 Summary shows a summary of the capital programme and planned financing. • Appendix G: - HRA Capital Programme 2023/24 to 2027/28, shows an update to the HRA capital budgets. <p>The HRA capital programme for 2023/24 through to 2027/28 has a total budget requirement £81.94m which will be financed through both internal and external resources.</p> <p>The programme from 2023/24 to 2027/28 relies upon £8.74m (11%) of external grants and contributions, the use of £38.07m (46%) of capital reserves, direct revenue financing (HRA) of £19.35m (24%) and £15.79m (19%) of capital receipts.</p>
2.4	<p>Approval of the capital programme by Full Council is an authority for Council officers to enter into contracts and incur expenditure up to the approved budget amounts and where applicable, secure external funding.</p>

<h3>3 How to address current situation</h3>	
3.1	<p>The General Fund capital programme has previously been approved by Full Council on 22 February 2023 and has been updated to reflect the most current required budget and are fully detailed in the appendices to this report.</p>
3.2	<p>New General Fund capital projects have been identified as part of the budget setting process and the required new capital budget request process review has been undertaken. These projects are shown in Appendix C.</p>
3.3	<p>The HRA capital programme has previously been approved by Full Council on 22 February 2023 and has been updated to reflect the most current required budget and are fully detailed in the appendices to this report.</p>

4 Reason/s for recommendation

4.1	The Council's constitution requires the Chief Finance Officer to prepare and present to Cabinet and Full Council the Council's capital programme for approval.
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Appendices

Appendices:	
Appendix A	General Fund Capital Programme 2023/24 to 2027/28 Summary
Appendix B	General Fund Capital Programme Revisions 2023/24 to 2027/28
Appendix C	General Fund Capital Programme 2023/24 to 2027/28 extract of budget increases greater than £0.50m and budget decreases greater than £0.50m.
Appendix D	General Fund Capital Programme 2023/24 to 2027/28 New Projects
Appendix E	General Fund Capital Programme 2023/24 to 2027/28 Extract of Externally Funded Projects
Appendix F	HRA Capital Programme 2023/24 to 2027/28 Summary
Appendix G	HRA Capital Programme 2023/24 to 2027/28

Background reference papers:

None.

General Fund Capital Programme 2023/24 to 2027/28 Summary

SUMMARY - GENERAL FUND PROGRAMME	2023/24	2023/24	2024/25	2024/25	2025/26	2025/26	2026/27	2026/27	2027/28	2023/24	2023/24
	£000 Original Budget	£000 Revised Budget	£000 Original Budget	£000 Revised Budget	£000 Original Budget	£000 Revised Budget	£000 Original Budget	£000 Revised Budget	£000 New Budget	to 2026/27 £000 Original Total	to 2027/28 £000 Revised Total
MHCLG Grant Funding to Freeport East via ESC as Accountable Body	19,810	0	4,940	0	0	0	0	0	0	24,750	0
Communities, Leisure & Tourism	8,700	1,936	21,500	5,671	21,500	22,850	0	24,841	0	51,700	55,298
Corporate Services (formerly ICT - Digital & Programme Management)	875	796	250	887	250	250	250	250	500	1,625	2,683
Corporate Services (formerly Operations)	29,105	17,505	12,988	13,320	1,280	4,960	1,280	1,930	1,930	44,653	39,645
Economic Development & Transport	14,363	5,651	8,782	21,777	22,849	18,498	0	909	0	45,994	46,835
Community Health (formerly Environmental Services & Port Health)	484	485	50	50	0	0	0	0	0	534	535
Resources & Value for Money (Formerly Financial Services)	0	400	0	315	0	0	0	0	0	0	715
Resources & Value for Money (Formerly General Fund Housing)	3,690	2,594	1,000	2,207	1,000	2,194	1,000	2,182	2,171	6,690	11,348
Resources & Value for Money - Long Term Debtors	5,000	0	0	0	0	0	0	0	0	5,000	0
Planning & Coastal Management	31,084	17,367	36,749	32,367	36,175	36,175	85,885	85,885	175	189,893	171,969
Total Capital Expenditure	113,111	46,734	86,259	76,594	83,054	84,927	88,415	115,997	4,776	370,839	329,028
Financed By:-											
Internal resources - reserves	6,309	7,229	1,350	2,637	800	1,250	800	1,250	1,500	9,259	13,866
Internal resources - borrowing	35,630	16,485	29,863	23,059	31,155	36,799	905	26,635	1,105	97,553	104,083
Grants	71,172	23,020	55,046	50,898	51,099	46,878	86,710	88,112	2,171	264,027	211,079
Total Financing	113,111	46,734	86,259	76,594	83,054	84,927	88,415	115,997	4,776	370,839	329,028

General Fund Capital Programme Revisions 2023/24 to 2027/28

MHCLG GRANT FUNDING TO FREEPORT EAST (via ESC as Accountable Body)	2023/24 £000 Original Budget	2023/24 £000 Carried forward Budget	2023/24 £000 Revised Budget	2023/24 £000 Revised Budget October 2023	2024/25 £000 Original Budget	2024/25 £000 Revised Budget October 2023	2025/26 £000 Original Budget	2025/26 £000 Revised Budget October 2023	2026/27 £000 2026/27 Original Budget	2026/27 £000 Revised Budget October 2023	2027/28 £000 New Budget	Funding Type
Harwich	5,600	0	5,600	0	1,400	0	0	0	0	0	0	EG
Felixstowe	8,460	0	8,460	0	3,540	0	0	0	0	0	0	EG
Gateway 14	5,750	250	6,000	0	0	0	0	0	0	0	0	EG

Total Capital Expenditure	19,810	250	20,060	0	4,940	0	0	0	0	0	0	0
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Financed By:-

Internal resources - Reserves	0	0	0	0	0	0	0	0	0	0	0	0
Internal resources - borrowing	0	0	0	0	0	0	0	0	0	0	0	0
Grants/contributions	19,810	250	20,060	0	4,940	0	0	0	0	0	0	0
	19,810	250	20,060	0	4,940	0	0	0	0	0	0	0

Project	Description
Harwich	Central Government Grant Funding to Freeport East via Principle (East Suffolk Council)
Felixstowe	Central Government Grant Funding to Freeport East via Principle (East Suffolk Council)
Gateway 14	Central Government Grant Funding to Freeport East via Principle (East Suffolk Council)

Funding Type Key:

CR Capital Receipt	EG External Grant
EB External Borrowing	ER Earmarked Reserve
EC External Contribution	IB Internal Borrowing

COMMUNITIES, LEISURE & TOURISM	2023/24 £000 Original Budget	2023/24 £000 Carried forward Budget	2023/24 £000 Revised Budget	2023/24 £000 Revised Budget October 2023	2024/25 £000 Original Budget	2024/25 £000 Revised Budget October 2023	2025/26 £000 Original Budget	2025/26 £000 Revised Budget October 2023	2026/27 £000 2026/27 Original Budget	2026/27 £000 Revised Budget October 2023	2027/28 £000 New Budget	Funding Type
Felixstowe North - Garden Neighbourhood Regeneration Project (Leisure Centre)	1,000	0	1,000	0	16,500	1,000	17,500	16,500	0	17,500	0	EB
Felixstowe North - Garden Neighbourhood Regeneration Project (Leisure Centre Land Purchase & Access Road)	5,000	947	5,947	500	3,000	1,456	0	4,000	0	2,991	0	EB
Felixstowe North - Garden Neighbourhood Regeneration Project (Infrastructure)	0	0	0	0	2,000	0	4,000	2,000	0	4,000	0	EB
Felixstowe Sports Hub	0	135	135	250	0	0	0	250	0	250	0	IB
Deben Fields (Former Deben High School) Felixstowe (BC)	2,200	150	2,350	500	0	2,850	0	0	0	0	0	IB
Leisure Centres (South)	500	87	587	550	0	315	0	100	0	100	0	IB
Leisure Centre Lowestoft (Roof)	0	41	41	41	0	50	0	0	0	0	0	IB
Leisure Centres - Pool Covers	0	95	95	95	0	0	0	0	0	0	0	IB

Total Capital Expenditure	8,700	1,455	10,155	1,936	21,500	5,671	21,500	22,850	0	24,841	0	0
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Financed By:-

Internal resources - Reserves	0	0	0	0	0	0	0	0	0	0	0	0
Internal resources - borrowing	8,700	1,455	10,155	1,936	21,500	5,671	21,500	22,850	0	24,841	0	0
Grants/contributions	0	0	0	0	0	0	0	0	0	0	0	0
	8,700	1,455	10,155	1,936	21,500	5,671	21,500	22,850	0	24,841	0	0

Project	Description
Felixstowe North - Garden Neighbourhood Regeneration Project (Leisure Centre)	Provision of new leisure centre site including purchase of site and access road
Felixstowe North - Garden Neighbourhood Regeneration Project (Infrastructure)	Infrastructure development to enable housing development
Felixstowe Seafront Gardens Handrailing	Installation of handrailing
Felixstowe Sports Hub	ESC is working with key sports clubs in Felixstowe including, football, cricket, rugby and hockey in order
Deben Fields (BC)	Site Leisure provision
Leisure Centres South	Planned preventative maintenance works required to ensure the immediate running of the facility.
Leisure Centre Lowestoft (Roof)	Refurbishment of Leisure Centre roof to enhance the life of the asset and to protect against water
Leisure Centre Pool Covers	Pool covers to increase energy efficiency and reduce loss of heat

CORPORATE SERVICES (formerly Digital & Programme Management)	2023/24 £000 Original Budget	2023/24 £000 Carried forward Budget	2023/24 £000 Revised Budget	2023/24 £000 Revised Budget October 2023	2024/25 £000 Original Budget	2024/25 £000 Revised Budget October 2023	2025/26 £000 Original Budget	2025/26 £000 Revised Budget October 2023	2026/27 £000 2026/27 Original Budget	2026/27 £000 Revised Budget October 2023	2027/28 £000 New Budget	Funding Type
Corporate IT Requirements	450	121	571	571	250	350	250	250	250	250	500	ER
ESSL ICT	100	337	437	200	0	237	0	0	0	0	0	ER
CCTV replacement	325	0	325	25	0	300	0	0	0	0	0	IB

Total Capital Expenditure	875	458	1,333	796	250	887	250	250	250	250	500
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Financed By:-

Internal resources - Reserves	550	458	1,008	771	250	587	250	250	250	250	500
Internal resources - borrowing	325	0	325	25	0	300	0	0	0	0	0
Grants/contributions	0	0	0	0	0	0	0	0	0	0	0
	875	458	1,333	796	250	887	250	250	250	250	500

Project	Description
Corporate IT Requirements	Corporate refresh of hardware and updating of current systems
ESSL ICT	Purchase of hardware systems for ESSL use
CCTV	Safer Streets initiative

CORPORATE SERVICES (formerly Operations)	2023/24	2023/24	2023/24	2023/24	2024/25	2024/25	2025/26	2025/26	2026/27	2026/27	2027/28	Funding Type
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	
	Original Budget	Carried forward Budget	Revised Budget	Revised Budget October 2023	Original Budget	Revised Budget October 2023	Original Budget	Revised Budget October 2023	Original Budget	Revised Budget October 2023	New Budget	
Bath Tap Chalets, Felixstowe	500	100	600	100	0	400	0	0	0	0	0	IB
Bawdsey Quay	0	57	57	0	0	0	0	0	0	0	0	ER
Cemeteries	380	8	388	88	0	300	0	0	0	0	0	IB
Cliff House, Felixstowe	900	100	1,000	194	0	800	0	0	0	0	0	IB
East Point Pavilion	0	195	195	100	0	95	0	0	0	0	0	IB
Estates Management	500	493	993	1,650	500	750	500	500	500	500	500	IB
Felixstowe Beach Village	1,500	89	1,589	1,589	0	0	0	0	0	0	0	IB
Felixstowe Ferry Car Park	150	0	150	150	0	50	0	0	0	0	0	IB
Felixstowe Garrison Lane Car Park	0	30	30	20	0	0	0	0	0	0	0	IB
Felixstowe Lighting	250	0	250	5	0	245	0	0	0	0	0	IB
Felixstowe Seafront Gardens Handrailing	0	15	15	5	0	10	0	0	0	0	0	IB
Felixstowe South - Public Realm and Martello Tower	2,000	1,980	3,980	0	2,000	1,000	0	2,980	0	0	0	IB
Fishing Hut Felixstowe	0	21	21	21	0	0	0	0	0	0	0	ER
Footway Lighting Works - Northern (cyclical replacement)	30	0	30	30	30	30	30	30	30	30	30	IB
Deben Fields (Former Deben High School) Felixstowe	500	350	850	50	0	0	0	0	0	0	0	IB
Lowestoft Beach Hut Block 2 to 5	100	248	348	0	0	20	0	0	0	0	0	IB
Lowestoft Victoria Terrace	150	0	150	75	0	75	0	0	0	0	0	IB
Lowestoft - car park enhancement (BCMC)	600	0	600	0	0	600	0	0	0	0	0	IB
Lowestoft - Property Purchase Hamilton Road	0	0	1,200	1,200	0	0	0	0	0	0	0	IB
Lowestoft - Property Wilde Street	0	0	0	750	0	0	0	0	0	0	0	IB
Newcombe Road Lowestoft	1,900	95	1,995	1,951	2,000	2,261	0	0	0	0	0	EB
Car Park Works	600	119	394	200	0	194	0	50	0	0	0	IB
Orford Road Felixstowe Access Ramp	0	20	20	6	0	0	0	0	0	0	0	IB
Play Areas (District wide)	300	70	370	200	200	200	200	200	200	200	200	IB
Public Conveniences Programme	500	35	535	285	0	725	0	0	0	0	0	IB
Railway Building - Lowestoft	1,700	32	1,732	500	308	1,540	0	0	0	0	0	EB
Ravine (Jubilee) Bridge	400	460	860	442	0	25	0	0	0	0	0	IB
Rotterdam Road Roof	300	0	300	405	0	0	0	0	0	0	0	IB
Seafront Gardens Beach Hut Sites & Relocations	0	495	495	495	0	0	0	0	0	0	0	IB
Southwold Caravan Site redevelopment	1,400	148	1,548	48	0	1,500	0	0	0	0	0	EB
Southwold Enterprise Hub	0	600	600	625	0	0	0	0	0	0	0	IB
Southwold Harbour Improvements	320	20	340	150	0	150	0	0	0	0	0	IB
Southwold Harbour - Pump out station	0	80	80	0	0	0	0	0	0	0	0	IB
Southwold Harbour - Visitor Moorings	100	50	150	150	900	0	0	0	0	0	0	IB
Southwold Harbour South Pier	6,000	200	6,200	0	6,000	0	0	0	0	0	0	EG
St Marys Church Woodbridge - Wall	0	144	144	4	0	140	0	0	0	0	0	IB
Operational Grounds Equipment	25	94	119	0	25	0	25	0	25	0	0	ER
Operational Vehicles/Equipment/Grounds Equipment/Assets	5,250	583	5,952	5,952	1,025	2,000	525	1,000	525	1,000	1,000	ER/CR/IB

Wheelie Bin purchase	0	0	0	0	0	200	0	200	0	200	200	IB
Barnards Way, Lowestoft	2,750	250	3,000	20	0	0	0	0	0	0	0	IB
Council Offices Leiston	0	67	67	20	0	0	0	0	0	0	0	IB
Felixstowe Beach Shower	0	10	10	0	0	10	0	0	0	0	0	IB
Woodbridge Model Boat Pond	0	25	25	25	0	0	0	0	0	0	0	IB

Total Capital Expenditure	29,105	7,283	37,382	17,505	12,988	13,320	1,280	4,960	1,280	1,930	1,930
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Financed By:-

Internal resources - Reserves	5,275	755	6,149	5,973	1,050	2,000	550	1,000	550	1,000	1,000
Internal resources - borrowing	17,830	6,328	25,033	11,532	5,938	11,320	730	3,960	730	930	930
Grants/contributions	6,000	200	6,200	0	6,000	0	0	0	0	0	0
	29,105	7,283	37,382	17,505	12,988	13,320	1,280	4,960	1,280	1,930	1,930

Project	Description
Bath Tap Chalets, Felixstowe	Structural works and refurbishment
Bawdsey Quay	Sewage system, clearance of car park and signage works
Cemeteries	Provision for Cemetery improvements across the district
Cliff House, Felixstowe	Development of site
East Point Pavilion	Redevelopment of the East Point Pavilion complex
Estates Management	A planned preventative maintenance list of works required on Council owned properties throughout the district
Felixstowe Beach Village	Construction and development of Felixstowe Beach Village
Felixstowe Ferry Car Park	Enhancement of site and sewage system
Felixstowe Garrison Lane Car Park	Enhancement of site
Felixstowe Lighting	Cyclical replacement of footway lighting
Felixstowe Seafront Gardens Handrailing	Installation of handrailing
Felixstowe South - Public Realm and Martello Tower	Development of South Seafront area and Martello Café Felixstowe
Fishing Hut Felixstowe	Rebuilding of fishing hut next to Felixstowe Pier that burnt down in 2019
Footway Lighting Works - Northern (cyclical replacement)	Cyclical replacement of footway lighting
Deben Fields	Purchase and development of former school site
Lowestoft Beach Hut Block 2 to 5	Replacement of beach hut wooden frontage
Lowestoft Victoria Terrace	Works on Victoria Terrace Beach Huts structure
Lowestoft Car Park enhancement (BCMS)	Enhancement works to car park
Lowestoft Hamilton Road	Purchase of site for regeneration
Lowestoft Wilde Street	Purchase of site for regeneration
Newcombe Road Lowestoft	Redevelopment of site to provide start up units
Car Park Works	Planned preventative maintenance works
Orford Road Felixstowe Access Ramp	Replacement of disabled access ramp near new café site
Play Areas (District wide)	Upgrade and refurbishment of district wide play areas
Public Conveniences Programme	Upgrade and refurbishment of district wide public conveniences
Railway Building - Lowestoft	Purchase and development of building contained within the Railway site
Ravine Bridge	Structural works and refurbishment works to part owned bridge
Rotterdam Road Roof	Replacement section of Rotterdam Road Depot Roof
Seafront Gardens Beach Hut Development	Development of Seafront Gardens site for new beach huts
Southwold Caravan Site redevelopment	Refurbishment of existing caravan site
Southwold Enterprise Hub	Capital investment
Southwold Harbour Improvements	Improvements to site
Southwold Harbour - Pump out station	Enhancement of pump out station
Southwold Harbour - Visitor Moorings	Visitor moorings enhancement
Southwold South Pier	Enhancement to the Pier Structure
St Marys Church Woodbridge - Wall	Refurbishment of closed church yard wall
Operational Grounds Equipment	Replacement lawn tractors/mowers
Operational Vehicles/Equipment	Purchase of Vehicles for operational use

(continued next page)

Whelie Bins purchase	Purchase of bins
Barnards Way, Lowestoft	8300m2 of undeveloped ESC land. Develop site for small industrial units including Service delivery of
Council Offices Leiston	Refurbishment to the fabric of the building to meet H&S requirement and to ensure asset remains
Felixstowe Beach Shower	Installation of outside beach shower
Memorial Wall Felixstowe	Development of new site for a memorial wall as an alternative option than benches. Plaques will be
Woodbridge Model Boat Pond	Refurbishment of model boat pond boundary posts and water treatment system

ECONOMIC DEVELOPMENT & TRANSPORT	2023/24	2023/24	2023/24	2023/24	2024/25	2024/25	2025/26	2025/26	2026/27	2026/27	2027/28	Funding Type
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	
	Original Budget	Carried forward Budget	Revised Budget	Revised Budget October 2023	Original Budget	Revised Budget October 2023	Original Budget	Revised Budget October 2023	Original Budget	Revised Budget October 2023	New Budget	
Towns Fund - Cultural Quarter (Phase 1)	3,690	240	3,930	285	5,160	8,554	15,220	15,035	0	476	0	EG/IB
Towns Fund -Station Quarter (Former Post & Sorting Office Inc. Sculpture)	2,300	35	2,335	340	1,000	3,035	0	127	0	433	0	EG/IB
Towns Fund - Historic Quarter	715	475	1,190	438	710	3,098	5,930	3,236	0	0	0	EG
Towns Fund - Port Gateway Improvement Project	2,470	35	2,505	2,469	145	181	0	0	0	0	0	EG
Towns Fund - Seafront Vision Delivery	719	81	800	801	470	747	0	0	0	0	0	EG
UKSPF	369	33	402	485	1,197	1,529	1,599	0	0	0	0	EG
Partnership Scheme in Conservation Areas (PSiCA).	100	0	100	0	100	200	100	100	0	0	0	EG
LUF - Seafront (Phase 3 BH)	4,000	600	4,600	833	0	4,433	0	0	0	0	0	IB/EG

Total Capital Expenditure	14,363	1,499	15,862	5,651	8,782	21,777	22,849	18,498	0	909	0
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Financed By:-

Internal resources - Reserves	0	600	0	0	0	0	0	0	0	0	0
Internal resources - borrowing	3,600	0	3,600	1,712	2,250	2,660	8,750	9,814	0	689	0
Grants/contributions	10,763	899	12,262	3,939	6,532	19,117	14,099	8,684	0	220	0
	14,363	1,499	15,862	5,651	8,782	21,777	22,849	18,498	0	909	0

Project	Description
Towns Fund	Towns Fund Grant investment of £24.9m in projects to regenerate the town, driving economic growth and acting as a catalyst for future investment, rising to £35.9m with the addition of matched funding (subject to ESC business case)
UKSPF	UK Shared Prosperity and Rural England Prosperity Funds - grant funding will support communities and place, supporting local business and people and skills
Partnership Scheme in Conservation Areas (PSiCA).	Partnership Scheme in Conservation Areas - grant available for capital projects in conservation areas
LUF - Seafront (Phase 3 BH)	Government Levelling Up Fund to support the continued investment and regeneration of Lowestoft

COMMUNITY HEALTH (formerly Environmental Services & Port Health)	2023/24	2023/24	2023/24	2023/24	2024/25	2024/25	2025/26	2025/26	2026/27	2026/27	2027/28	Funding Type
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	
	Original Budget	Carried forward Budget	Revised Budget	Revised Budget October 2023	Original Budget	Revised Budget October 2023	Original Budget	Revised Budget October 2023	Original Budget	Revised Budget October 2023	New Budget	
Port Health	484	0	484	485	50	50	0	0	0	0	0	ER

Total Capital Expenditure	484	0	484	485	50	50	0	0	0	0	0
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Financed By:-

Internal resources - Reserves	484	0	484	485	50	50	0	0	0	0	0
Internal resources - borrowing	0	0	0	0	0	0	0	0	0	0	0
Grants/contributions	0	0	0	0	0	0	0	0	0	0	0
	484	0	484	485	50	50	0	0	0	0	0

Project	Description
Port Health	Capital expenditure for the function of the Port Health Service

RESOURCES & VALUE FOR MONEY (formerly Financial Services)	2023/24 £000 Original Budget	2023/24 £000 Carried forward Budget	2023/24 £000 Revised Budget	2023/24 £000 Revised Budget October 2023	2024/25 £000 Original Budget	2024/25 £000 Revised Budget October 2023	2025/26 £000 Original Budget	2025/26 £000 Revised Budget October 2023	2026/27 £000 Original Budget	2026/27 £000 Revised Budget October 2023	2027/28 £000 New Budget	Funding Type
Romany Lane (previously STTS)	0	388	388	400	0	315	0	0	0	0	0	IB

Total Capital Expenditure	0	388	388	400	0	315	0	0	0	0	0	
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Financed By:-

Internal resources - Reserves	0	388	388	0	0	0	0	0	0	0	0	
Internal resources - borrowing	0	0	0	400	0	315	0	0	0	0	0	
Grants/contributions	0	0	0	0	0	0	0	0	0	0	0	
	0	388	388	400	0	315	0	0	0	0	0	

Project	Description
Romany Lane (previously STTS)	Remedial and improvement works to the Romany Lane site

RESOURCES & VALUE FOR MONEY(formerly General Fund Housing)	2023/24 £000 Original Budget	2023/24 £000 Carried forward Budget	2023/24 £000 Revised Budget	2023/24 £000 Revised Budget October 2023	2024/25 £000 Original Budget	2024/25 £000 Revised Budget October 2023	2025/26 £000 Original Budget	2025/26 £000 Revised Budget October 2023	2026/27 £000 Original Budget	2026/27 £000 Revised Budget October 2023	2027/28 £000 New Budget	Funding Type
Disabled Facilities Grant	1,000	0	1,000	2,594	1,000	2,207	1,000	2,194	1,000	2,182	2,171	EG
Local Authority Housing Fund (LAHF)	2,690	0	2,690	0	0	0	0	0	0	0	0	EG

Total Capital Expenditure	3,690	0	3,690	2,594	1,000	2,207	1,000	2,194	1,000	2,182	2,171	
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Financed By:-

Internal resources - Reserves	0	0	0	0	0	0	0	0	0	0	0	
Internal resources - borrowing	0	0	0	0	0	0	0	0	0	0	0	
Grants/contributions	3,690	0	3,690	2,594	1,000	2,207	1,000	2,194	1,000	2,182	2,171	
	3,690	0	3,690	2,594	1,000	2,207	1,000	2,194	1,000	2,182	2,171	

Project	Description
Disabled Facilities Grant	HIA Disabled Facilities Grant works
Local Authority Housing Fund (LAHF)	Central Government General Fund Housing Scheme

RESOURCES & VALUE FOR MONEY - LONG TERM DEBTORS	2023/24 £000 Original Budget	2023/24 £000 Carried forward Budget	2023/24 £000 Revised Budget	2023/24 £000 Revised Budget October 2023	2024/25 £000 Original Budget	2024/25 £000 Revised Budget October 2023	2025/26 £000 Original Budget	2025/26 £000 Revised Budget October 2023	2026/27 £000 Original Budget	2026/27 £000 Revised Budget October 2023	2027/28 £000 New Budget	Funding Type
LATCO - Loan funding	5,000	0	5,000	0	0	0	0	0	0	0	0	IB

Total Capital Expenditure	5,000	0	5,000	0	0	0	0	0	0	0	0	
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Financed By:-

Internal resources - Reserves	0	0	0	0	0	0	0	0	0	0	0	
Internal resources - borrowing	5,000	0	5,000	0	0	0	0	0	0	0	0	
Grants/contributions	0	0	0	0	0	0	0	0	0	0	0	
	5,000	0	5,000	0	0	0	0	0	0	0	0	

Project	Description
LATCO	Loan to the LATCO for investment purposes

PLANNING & COASTAL MANAGEMENT	2023/24 £000 Original Budget	2023/24 £000 Carried forward Budget	2023/24 £000 Revised Budget	2023/24 £000 Revised Budget October 2023	2024/25 £000 Original Budget	2024/25 £000 Revised Budget October 2023	2025/26 £000 Original Budget	2025/26 £000 Revised Budget October 2023	2026/27 £000 Original Budget	2026/27 £000 Revised Budget October 2023	2027/28 £000 New Budget	Funding Type
Coast Protection - Minor Capital Works	175	100	275	275	175	240	175	175	175	175	175	IB
Navigation Markers	0	0	0	0	0	300	0	0	0	0	0	IB
North Denes Promenade	0	0	0	0	0	200	0	0	0	0	0	IB
Corton & North Corton Hybrid Scheme	7,000	200	7,200	0	7,000	0	0	0	0	0	0	EG
Lowestoft Flood Risk Management Project Phase 1 (Tidal Walls, Pluvial & Fluvial)	4,000	-2,530	1,470	5,470	0	0	0	0	0	0	0	EG
Lowestoft Flood Risk Management Project Phase 2 (Tidal Gate) *	10,809	4,208	15,017	11,017	29,574	29,574	36,000	36,000	85,710	85,710	0	EG
Southwold Harbour Fender	0	53	53	0	0	53	0	0	0	0	0	IB/EG
Southwold Harbour North Wall (Phase 1 & 2)	0	462	462	605	0	2,000	0	0	0	0	0	ER/IB
Thorpeness (Externally Funded)	0	3,300	3,300	0	0	0	0	0	0	0	0	EG
Thorpeness Emergency Works	0	115	115	0	0	0	0	0	0	0	0	EC/EG
Resilient Coasts Project	9,100	-96	9,004	0	0	0	0	0	0	0	0	EG

Total Capital Expenditure	31,084	5,812	36,896	17,367	36,749	32,367	36,175	36,175	85,885	85,885	175
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Financed By:-

Internal resources - Reserves	0	0	1,694	0	0	0	0	0	0	0	0
Internal resources - borrowing	175	615	790	880	175	2,793	175	175	175	175	175
Grants/contributions	30,909	5,197	34,412	16,487	36,574	29,574	36,000	36,000	85,710	85,710	0
	31,084	5,812	36,896	17,367	36,749	32,367	36,175	36,175	85,885	85,885	175

Project	Description
Coast Protection - Minor Capital Works	The Coastal Management Team carries out a comprehensive programme of inspections which highlight when repair and maintenance works need to be carried out. This ensures that the defences are
Navigation Markers	Replacement Sea Navigation Markers
North Denes Promenade	Safety works to promenade surface
Corton & North Corton Hybrid Scheme	This item is for ESC contribution to privately funded works to part remove and part rebuild in rock, defences to the north of Corton Village that were abandoned after failure in line with 2010 Shoreline
Lowestoft Flood Risk Management Project Phase 1 & 2	A major project to construct a permanent tidal wall which will be built around the harbour to protect Lowestoft from future tidal surges, with a tidal gate located near to the Bascule Bridge to prevent surge
Southwold Harbour Fender	Southwold Harbour fender remedial works following damage to the fender which was originally
Southwold Harbour North Wall Phase 1 & 2	Urgent works needed to the Southwold North seawall to ensure its stability and is not breached.
Thorpeness (Externally Funded)	Strengthen the soft bag defences installed here in 2010/12 that were damaged by unusually high
Thorpeness Emergency Works	Installation of a 35-metre rock revetment to protect
Resilient Coast Projects	Flood and Coastal Resilience Innovation Programme funded by the Environment Agency
Pakefield Coastal Resilience project	New accelerated project due to rapid increase of coastal erosion.

	2023/24 £000 Original Budget	2023/24 £000 Carried forward Budget	2023/24 £000 Revised Budget	2023/24 £000 Revised Budget October 2023	2024/25 £000 Original Budget	2024/25 £000 Revised Budget October 2023	2025/26 £000 Original Budget	2025/26 £000 Revised Budget October 2023	2026/27 £000 Original Budget	2026/27 £000 Revised Budget October 2023	2027/28 £000 New Budget
Total Capital Expenditure	113,111	17,145	131,250	46,734	86,259	76,594	83,054	84,927	88,415	115,997	4,776
Financed By:-											
Internal resources - Reserves	7,339	3,137	11,689	7,208	2,280	2,637	830	1,250	830	1,250	1,500
Internal resources - borrowing	34,600	7,462	42,937	16,506	28,933	23,059	31,125	36,799	875	26,635	1,105
Grants/contributions	71,172	6,546	76,624	23,020	55,046	50,898	51,099	46,878	86,710	88,112	2,171
	113,111	17,145	131,250	46,734	86,259	76,594	83,054	84,927	88,415	115,997	4,776

Appendix C

2023/24 to 2027/28 - BUDGET INCREASES ABOVE £0.50M	Current Budget £000	Revised Budget 2023-24 to 2027-28 £000	Variance £000	Funding Type
Deben Fields (Former Deben High School) Felixstowe -Leisure Facility	2,350	3,350	1,000	IB
Disabled Facilities Grants	5,000	11,348	6,348	EG
Estates Management	2,493	3,400	907	IB
Felixstowe Sports Hub	135	750	615	IB
LUF - Seafront (Phase 3 BH)	4,600	5,266	666	IB/EG
Operational Vehicles/Equipment/Grounds Equipment/Assets	8,552	10,952	2,400	ER/CR/IB
Southwold Harbour North Wall Phase 2	462	2,605	2,143	IB
Totals	23,592	37,671	14,079	

2023/24 to 2027/28 - BUDGET DECREASES ABOVE £0.50M	Current Budget 2023-24 to 2027-28 £000	Revised Budget 2023-24 to 2027-28 £000	Variance £000	Funding Type
MHCLG Funding to Freeport East via ESC as Accountable Body - Harwich	7,000	0	-7,000	EG
MHCLG Funding to Freeport East via ESC as Accountable Body - Felixstowe	12,000	0	-12,000	EG
MHCLG Funding to Freeport East via ESC as Accountable Body - Gateway 14	6,000	0	-6,000	EG
Southwold Harbour South Pier	6,200	0	-6,200	EG
Barnards Way, Lowestoft	3,000	20	-2,980	IB
Local Authority Housing Fund (LAHF)	2,690	0	-2,690	EG
LATCO - Loan funding	5,000	0	-5,000	IB
Corton & North Corton Hybrid Scheme	7,000	0	-7,000	EG
Thorpeness (Externally Funded)	3,300	0	-3,300	EG
Resilient Coasts Project	9,004	0	-9,004	EG/IR
Totals	61,194	20	-61,174	

General Fund Capital Programme 2023/24 to 2027/28 New Projects

2023/24 to 2027/28 NEW PROJECTS	2023/24	2023/24	2024/25	2024/25	2025/26	2025/26	2026/27	2026/27	2027/28	Funding Type
	£000 Original Budget	£000 Revised Budget	£000 Original Budget	£000 Revised Budget	£000 Original Budget	£000 Revised Budget	£000 Original Budget	£000 Revised Budget	£000 Original Budget	
Lowestoft - Property Purchase Hamilton Road	0	750	0	0	0	0	0	0	0	IB
Navigation Markers	0	0	0	300	0	0	0	0	0	IB
North Denes Promenade	0	0	0	200	0	0	0	0	0	IB
Wheelie Bin purchase	0	0	0	200	0	200	0	200	200	IB
Total Budgeted Expenditure	0	750	0	700	0	200	0	200	200	
Financed By:-										
Internal resources - Reserves	0	0	0	0	0	0	0	0	0	
Internal resources - borrowing	0	750	0	700	0	200	0	200	200	
Grants/contributions	0	0	0	0	0	0	0	0	0	
Total Financing	0	750	0	700	0	200	0	200	200	

General Fund Capital Programme 2023/24 to 2027/28
Extract of Externally Funded Projects

2023/24 to 2027/28 EXTERNALLY FUNDED PROJECTS	Total Budget 2023-24 to 2027-28 £000	External Funding £000	ESC Funding £000
Towns Fund - Cultural Quarter (Phase 1)	24,350	14,350	10,000
Towns Fund -Station Quarter (Former Post & Sorting Office)	3,935	2,935	1,000
Towns Fund - Historic Quarter	6,772	6,772	0
Towns Fund - Port Gateway Improvement Project	2,650	2,650	0
Towns Fund - Seafront Vision Delivery	1,548	1,548	0
UKSPF	2,014	2,014	0
Partnership Scheme in Conservation Areas (PSiCA).	300	300	0
LUF - Seafront (Phase 3 BH)	5,266	4,300	966
Disabled Facilities Grant	11,348	11,348	0
Lowestoft Flood Risk Management Project	167,771	167,771	0
Totals	225,954	213,988	11,966

HRA Capital Programme 2023/24 to 2027/28 Summary

SUMMARY - HRA PROGRAMME	2023/24	2023/24	2024/25	2024/25	2025/26	2025/26	2026/27	2026/27	2027/28	2023/24 to 2027/28
	£000 Original Budget	£000 Revised Budget	£000 Original Budget	£000 Revised Budget	£000 Original Budget	£000 Revised Budget	£000 Original Budget	£000 Revised Budget	£000 New Budget	£000 Revised Total
Asset Investment	11,515	4,203	10,976	7,890	5,140	10,190	5,140	5,490	4,990	32,763
Acquisition & Development	15,929	9,816	9,282	21,178	7,000	7,479	7,000	6,523	4,183	49,179
Total Capital Expenditure	27,444	14,019	20,258	29,068	12,140	17,669	12,140	12,013	9,173	81,942
Financed By:-										
Internal resources - capital receipt	9,893	2,227	660	5,344	4,710	2,244	3,810	3,024	2,948	15,787
Internal resources - Housing Revenue Account	3,155	3,070	2,087	10,278	0	2,967	3,400	1,795	1,235	19,345
Internal resources - reserves	12,953	7,606	17,211	9,890	6,430	10,498	4,930	5,290	4,790	38,074
Grants	1,443	1,116	300	3,556	1,000	1,960	0	1,904	200	8,736
Total Financing	27,444	14,019	20,258	29,068	12,140	17,669	12,140	12,013	9,173	81,942

HRA Capital Programme 2023/24 to 2027/28

ASSET INVESTMENT	2023/24	2023/24	2024/25	2024/25	2025/26	2025/26	2026/27	2026/27	2027/28
	£000 Original	£000 Revised	£000 Original	£000 Revised	£000 Original	£000 Revised	£000 Original	£000 Revised	£000 Original
Bathrooms	200	200	200	100	200	100	200	150	150
Central Heating/Boilers	350	400	500	500	500	500	500	500	500
Consultancy Compliance requirements	480	1,158	0	1,170	0	750	0	750	250
Demolition	0	106	0	70	0	50	0	50	50
Disabled Works	180	70	180	180	180	180	180	180	180
Door entry & Warden Systems	100	348	0	0	0	0	0	0	0
Energy Efficiencies Work	100	100	500	100	500	100	500	100	100
Environmental Works	1	2	10	10	10	10	10	10	10
External Doors	10	50	20	250	20	250	20	250	250
Housing Redevelopment	2,357	0	0	2,100	1,000	0	1,000	0	0
Housing Repair Vans	0	112	500	200	210	200	210	200	200
Insulation	0	0	0	500	0	500	0	500	500
Kitchens - Programmed & Responsive	410	350	650	250	650	250	650	350	350
New accommodation Project	2,500	0	0	0	0	2,850	0	0	0
Reconversions	150	285	150	0	150	0	150	0	0
Re-Roofing	250	200	450	450	450	450	450	450	450
Retrofitting	2,400	0	2,700	500	1,000	500	1,000	500	500
Rewiring	300	250	250	250	250	250	250	250	250
Solar Panels	0	0	0	1,000	0	1,000	0	1,000	1,000
St Peters Court - Door replacement	276	484	0	0	0	0	0	0	0
St Peters Court - Fire Risk Compliance	378	75	0	0	0	0	0	0	0
St Peters Court - Internal Dec's	52	0	0	0	0	0	0	0	0
St Peters Court - Lift	600	3	0	0	0	0	0	0	0
St Peters Court - Remove Cladding & Change windows	140	0	4,846	0	0	0	0	0	0
St Peters Court - Shed area	50	0	0	0	0	0	0	0	0
St Peters Court - Sprinkler System	223	0	0	0	0	0	0	0	0
Windows & Facias	8	10	20	250	20	250	20	250	250
Total Budgeted Expenditure	11,515	4,203	10,976	7,890	5,140	10,190	5,140	5,490	4,990
Financed By :-									
Housing Capital Receipt	1,936	111	660	200	210	200	210	200	200
Housing Revenue Account	0	0	0	0	0	0	0	0	0
Housing Revenue Account Reserves	9,579	4,092	10,316	7,690	4,930	9,990	4,930	5,290	4,790
	11,515	4,203	10,976	7,890	5,140	10,190	5,140	5,490	4,990

ACQUISITION AND DEVELOPMENT PROGRAMME	2023/24	2023/24	2024/25	2024/25	2025/26	2025/26	2026/27	2026/27	2027/28
	£000 Original	£000 Revised	£000 Original	£000 Revised	£000 Original	£000 Revised	£000 Original	£000 Revised	£000 Original
New builds	15,929	8,556	9,282	21,178	7,000	7,479	7,000	6,523	4,183
Acquisitions	0	1,260	0	0	0	0	0	0	0
Total Budgeted Expenditure	15,929	9,816	9,282	21,178	7,000	7,479	7,000	6,523	4,183
Financed By :-									
Housing Capital Receipt	7,957	2,116	0	5,144	4,500	2,044	3,600	2,824	2,748
Housing Revenue Account	3,155	3,070	2,087	10,278	0	2,967	3,400	1,795	1,235
Housing Revenue Account Reserves	3,374	3,514	6,895	2,200	1,500	508	0	0	0
External Funding	1,443	1,116	300	3,556	1,000	1,960	0	1,904	200
	15,929	9,816	9,282	21,178	7,000	7,479	7,000	6,523	4,183

Project	Description
New builds	Provision of new housing
Acquisitions	Purchase of Housing stock

	2023/24	2023/24	2024/25	2024/25	2025/26	2025/26	2026/27	2026/27	2027/28
	£000 Original	£000 Revised	£000 Original	£000 Revised	£000 Original	£000 Revised	£000 Original	£000 Revised	£000 Original
Programme Total	27,444	14,019	20,258	29,068	12,140	17,669	12,140	12,013	9,173



CABINET
Tuesday, 02 January 2024

Subject	Housing Revenue Account (HRA) Budget Report 2024/25 to 2027/28
Cabinet Member	Councillor Vince Langdon-Morris Cabinet Member with responsibility for Resources and Value for Money Councillor David Beavan Deputy Leader and Cabinet Member with responsibility for Housing
Report Author(s)	Amber Welham Finance Business Partner - Housing amber.welham@eastsoffolk.gov.uk
Head of Service	Lorraine Rogers Chief Finance Officer and Section 151 Officer lorraine.rogers@eastsoffolk.gov.uk
Director	Chris Bally Chief Executive 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:

This report brings together the relevant information to enable Cabinet to review, consider, and comment upon the Council's proposed 2024/25 to 2027/28 Housing Revenue Account (HRA) budget, before making recommendations to Council on 21 February 2024. This report also forms the basis of Scrutiny Committee's review of the HRA Budget at its meeting on 18 January 2024 as required under the Budget and Policy Framework.

The report details how rents and service charges are determined, and the proposed increases for 2024/25 are set out for approval.

The report also notes changes in welfare and benefits and the impact of external and internal requirements which have been considered when completing the budgets, and rents and service charges for 2024/25.

Options:

HRA Budget Setting

The Housing Revenue Account Budget forms part of the Council's Budget and Policy Framework. The Council is required to set an annual budget and therefore no other options have been considered for this.

Rent Setting

Following four years of compulsory rent reduction, setting rents from 2020/21 below the maximum permitted under the Rent Standard is not recommended. However, the 2023/24 rents were set 1% below the Government cap of 7% to help alleviate financial pressures on our tenants. From 2024/25 it is not recommended to repeat this to ensure financial sustainability within the HRA.

The budgets work on the assumption of increasing rents by the September Consumer Price Index + 1% as per the Rent Standard. Government have not yet released any statements about imposing another rent cap, or how rents are to be set from 2025/26.

Recommendation/s:

1. That the following be approved for review and consideration by the Scrutiny Committee as part of the budget process:
 - a. The draft HRA budget for 2024/25, and the indicative figures for 2025/26 to 2027/28;
 - b. Movements in HRA Reserves and Balances;
 - c. Proposed rent increase of up to 7.7%. In line with the Rent Standard September 2023 CPI + 1%.
 - d. Service charges and associated fees for 2024/25;
 - e. Rent and Service Charges to be charged over a 51-week period unless being used for Temporary Accommodation when a 53-week period will be applied, due to 2024/25 being a 53-week year.

2. That the following be noted:

- a. Projected outturn position for 2023/24;
- b. Changes affecting public and private sector housing and welfare;
- c. Effects of the cost-of-living crisis to the HRA.

Corporate Impact Assessment

Governance:

As set out in the Council's Financial Procedure Rules, the Chief Finance Officer is responsible for preparing and submitting reports on revenue budgets to Cabinet and Council.

The 2024/25 budget and the indicative figures for 2025/26 to 2027/28; will be considered at the following Council meetings:

- Cabinet 2 January 2024
- Scrutiny Committee 18 January 2024
- Cabinet 6 February 2024
- Full Council 21 February 2024

ESC policies and strategies that directly apply to the proposal:

The HRA budget directly supports the Council's aim of maintaining financial sustainability. With balanced budgets, and the ability to pay off its current debt, it demonstrates its ability to be financially self-sufficient. The following policies and strategies apply to the proposals of this report.

- East Suffolk Strategic Plan
- East Suffolk Medium Term Financial Strategy
- East Suffolk HRA Business Plan 2018-2048
- East Suffolk Treasury Management Strategy and Treasury Management Policy
- Annual Governance Statement
- Financial Procedure Rules

Environmental:

Consideration has been given in the budget to progressing the Council's wider ambition to becoming a carbon neutral organisation. Budgets have been included within the HRA's capital programme for significant investment in its own stock to contribute towards this. This includes £1,000,000 per annum for instalment of solar panels where appropriate, £500,000 per annum replacing and improving windows and external doors, £500,000 for upgrades and replacement of loft and cavity wall insulation and associated works of properties, and a further contingency of £500,000 for other initiatives to help improve the energy efficiencies of the housing stock.

Stock condition surveys are currently being undertaken which will help with planned programmes of work to target energy efficiency within the housing stock.

The Social Housing (Regulation) Act 2023 received royal assent on 20 July 2023. Many provisions need regulations before they come into force, but it is anticipated these will be in place for 2024/25. One of the provisions is for all social housing to have a minimum EPC of C by 2030.

The combination of the stock condition surveys of all HRA stock, and the asset investments planned will help ensure the HRA achieves this goal.

Equalities and Diversity:

An Equality impact assessment has been completed for setting the HRA budgets and proposed rent setting for 2024/25, EQIA568922876.

There is potential for a negative impact on low-income households if rents are increased. However, measures have been put in place to support these tenants if this should happen. Affordable rents are capped at the LHA rate which is the most a tenant can receive for the housing element of benefits. This should mean the rents are affordable to all.

Financial:

A summary analysis of the budget movement is shown in **Table A**. This table is supported by **Appendix A1**, that gives a full breakdown of all budget changes between 2024/25 and 2027/28, with a brief explanation to the changes.

Table A

HRA MTFS Updates	2024/25 £'000	2025/26 £'000	2026/27 £'000	2027/28 £'000
Additional Cost	8,444	3,364	1,660	1,979
Reduced Income	428	442	599	602
Additional Income	(1,690)	(955)	(858)	(1,408)
Saving	(327)	(439)	(903)	(3,097)
Use of Reserves	(4,335)	(1,328)	(1,283)	(1,120)
Net Movement Each Year	2,520	1,084	(785)	(804)
New Movement over the period 2024/25 to 2027/28				2,015

The full HRA budget and relevant information can be seen in **Appendix A2**.

Human Resources:

The budget has been increased to cover staffing requirements of the HRA, with 13.6 new permanent posts being added in 2024/25 and 2 fixed term posts. This follows the addition of 8.75 new posts during the 2023/24 budgets setting.

The new permanent posts will help to meet the growing demands of all service areas following the introduction of the Social Housing (Regulation) Act 2023, covering services such as housing compliance, housing development, tenant engagement and data analysis.

The cost of these additional posts is £610,000 in 2024/25, increasing to over £700,000 by 2027/28.

These posts form part of the Housing Team Restructure which has a separate report to be approved by Cabinet.

The budgets do not currently include the full costs of the housing restructure, as there is a proposal to add a further 29.4 posts and additional work is required to finance these posts. The cost associated with these additional 29.4 posts is approximately £1.2 million per annum, increasing to £1.35 million by 2027/28.

The 2 additional fixed term posts are in relation to the decant and demolition of St Peters Court and were approved as part of the cabinet report 'Asset Review – St Peters Court, Lowestoft on 3 October 2023.

Further changes to the staffing budgets are a result of the following:

- 2023/24 national pay award agreed.
- In year vacancies.
- Updating of job descriptions and regrading.

ICT:

Significant investment is being made in Housing software to improve the service tenants receive and create efficiencies within the repairs and maintenance service. Much of the initial investment is a cost pressure to 2023/24 budgets.

Legal:

No impact directly arising from this report.

The Housing Revenue Account (HRA) reflects the statutory requirement under Section 74 of the Local Government and Housing Act 1989 to account separately for local authority housing provision. It is a ring-fenced account, containing solely the costs arising from the provision and management of the Council's housing stock, offset by tenant rents, service charges and other income. The Council has a statutory responsibility to set a balanced HRA budget.

From 1 April 2020 the Government set out a new policy statement for rents on social housing (the Policy Statement). This was implemented through the Regulator for Social Housing rather than through legislation. The Government published a 'Direction to the Regulator' to set a Rent Standard, and the Regulator is required to have regard to this when setting its Rent Standard. For the first time, the Government has directed the Regulator to apply its Rent Standard to all registered providers, including local authorities.

Risk:

The HRA self-financing regime transferred the financial risk to the Council. The HRA manages this risk through prudent budgeting, careful financial management and adoption of a rolling 30-year financial business plan. The financial sustainability of the budget is managed by ensuring adequate funds are set aside to repay the debt and appropriate levels of working balances are available for any unforeseen costs. It also gives the HRA the opportunities to meet its business objectives whilst creating efficiencies and savings, giving added value for money.

The HRA budgets 2024/25 to 2027/28 (including a projected outturn for 2023/24) have been updated in the 30-year financial business plan, it shows the current requirements

are financially sustainable if the proposed income levels are approved, and no further borrowing will be required at this point.

However, there are significant costs pressures on the HRA during the MTFs, and all reserves and balances have been utilised to fund the budget and capital programme. Adding any further costs will put the financial sustainability of the HRA at risk.

External Consultees:	Tenants will be informed in writing of any changes to their rent and service charges one month before they take effect. Tenants will have the opportunity to speak to their rent officer or the HRA's financial inclusion officers if they have any concerns.
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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 checked="" 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"/>
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 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 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 checked="" type="checkbox"/>	<input type="checkbox"/>
<p>How does this proposal support the priorities selected?</p> <p>Under the Self-Financing regime, the future resources and spend of the HRA are based on local decisions. The budget includes financing the capital programme and reserve balances as per the HRA financial business plan. Currently there is no requirement for any additional borrowing, demonstrating financial sustainability and supporting how ESC governs itself.</p>			

Background and Justification for Recommendation

1 Background facts	
	Self-Financing Arrangement
1.1	The HRA self-financing regime was introduced in April 2012. The Council had to take on a significant amount of debt (£68 million) in exchange for not paying future housing subsidy. This change is beneficial to the HRA over the long-term.
1.2	A 30-year financial business model is used to support the delivery of the HRA under the self-financing regime. It makes assumptions regarding the level of income available and the key risks facing housing service delivery within this timeframe. It also programmes in the due date for current borrowing to be repaid, whilst delivering the required service.
1.3	The HRA funds the costs of borrowing for the initial debt settlement. The Council has chosen to incorporate this debt into the Council's overall borrowing portfolio, creating a single pool and charging interest to the HRA in proportion to the debt it holds.
1.4	Originally the HRA had a 'borrowing cap' of £87.26 million imposed on it by Central Government, however this was removed in 2018 when Central Government issued a determination revoking the limit of indebtedness on the HRA. However, the HRA's borrowing capacity is still restricted to the operational boundary for external debt for the whole Council. The boundary is set at £173 million, which includes both the General Fund (GF) and the HRA. Therefore, consideration must be given to the Council's total borrowing and the requirements for borrowing by the GF, before considering increasing the current borrowing of the HRA.
1.5	As of 1 April 2023, the total debt of the HRA was £60.4 million (£58 million from the self-financing settlement and £2.4 million pre-self-financing). During the budget period 2024/25 to 2027/28 a further £960,000 is due to be repaid in 2024/25 and £10 million in 2026/27. Both amounts have already been set aside in the debt repayment reserve and the Major Repairs Reserve.

	<p>Interest on all current HRA borrowing is fixed, therefore, the HRA will see a reduction in interest payments in the subsequent years of repayment.</p> <p>The HRA spending plans, including its capital investment programme, are fully funded from existing resources. Therefore, there is currently no need to make use of any additional borrowing. However, any additional costs added to the budget in the future, will likely require additional borrowing, and the HRA will need to ensure it can service the interest payments as well as the principle borrowing.</p>
1.6	<p>Welfare Reform</p> <p>Universal Credit (UC) was first introduced 11 years ago as part of ‘The Welfare Reform Act 2012’. It is a single payment for working aged people who are looking for work or are on a low-income. It replaces housing benefit, working tax credit, child tax credit, income support, income-based jobseekers’ allowance and income related employment and support allowance. It was rolled out in the district in 2015.</p>
1.7	<p>New claimants of UC have an initial wait time of five weeks before receiving their first payment, however if they are already receiving housing benefits, this will continue for the first two weeks of the claim process, reducing pressure on tenants.</p>
1.8	<p>The benefit cap has always been £20,000 per annum (outside of Greater London), since the introduction of the Welfare Reform Act 2012. However, from April 2023, Government increased the cap by 10.1% for the first time since its introduction. The current cap is £22,020 per annum, which provided claimants with a much-needed boost during a cost-of-living crisis. However, it has been confirmed this new cap will be frozen for 2024/25.</p> <p>If new claimants’ previous income was higher than the benefit cap, they are given a ‘grace period’ of nine months, easing the transition for the claimant.</p>
1.9	<p>Although the benefit cap is frozen, UC payments will increase by 6.7% (September CPI) from April 2024, up to the benefit cap.</p>
1.10	<p>The Local Housing Allowance (LHA) rates are used to calculate the amount of housing benefits a tenant can receive. These have been frozen for four years now.</p> <p>It was announced in the Autumn Statement 2023 that the LHA rates will be reset in April 2024 to the 30th percentile of the local market rents of September 2023. This means the cheapest 30% of rents in the area should be affordable to people claiming UC or housing benefits.</p>
1.11	<p>Under-Occupation Charge (also referred to as the ‘Bedroom tax’) is a fixed cut to housing benefit or the housing element of UC received based on the number of spare bedrooms in the property. The charge only applies to working aged tenants renting from local authorities, registered housing associations or other registered social landlords and is set by Central Government. The cut is 14% for one spare room, or 25% for two or more spare rooms.</p> <p>To help alleviate the pressure of this penalty, the Council’s HRA offers the incentive called ‘Cash-for-Moving.’ This is a widely used scheme across councils to encourage tenants to downsize. Tenants can bid for a smaller property on</p>

	Gateway to Home-Choice, and if successful the tenant could receive up to £2,000 depending on the number of bedrooms given up.
1.12	The Right to Buy (RTB) Scheme allows tenants to purchase their council house at a discounted rate. The maximum discount available is 70% or £96,000 (outside of Greater London) whichever is lower. This value is set by Central Government and increases in April each year by CPI.
1.13	In 2012, the Council entered into an agreement with the Secretary of state to retain a share of its RTB receipts to reinvest in the provision of new affordable homes. As of April 2021, the conditions of this agreement were updated by Central Government. The receipts can now fund up to 40% of investment in new affordable housing (previously only 30%) and they can now contribute to the delivery of shared ownership properties, which they could not before.
1.14	On average the HRA loses 30 properties a year through RTB, and this is the assumption used within the 30-year business plan. However, for 2023/24 (as at 10 December 2023) only 10 properties have been sold through the scheme. This is a trend being seen by many other councils and is likely linked to increased living costs and high interest rates.
1.15	The implication of RTB sales is a reduction in dwelling rents received. The annual income lost through RTB is on average £140,000 per annum (year on year). RTB sales are considered when setting the dwelling income budget.

2 Current position

	Dwelling Rents and Service Charges
2.1	The 2020 Rent Standard is the Policy Statement for rents on social housing and has been in effect from 1 April 2020. It is the first-time Government have directed the Regulator of Social Housing to apply its Rent Standard to all social housing providers, including local authorities.
2.2	From 1 April 2020, all Registered Provider rents (including Local Authorities) must be charged in accordance with the Government Policy Statement on Rents for Social Housing. The Rent Standard, published by the Regulator of Social Housing in 2020 requires rents to be set in line with this policy statement.
2.3	The rent policy permits the Council to increase its rents for at least five years to 2024/25 by up to CPI for September of the previous year plus 1%. The Rent Standard also provides freedom to apply a lower increase or to freeze or reduce the rent if a registered housing provider chooses to do so.
2.4	There has been no indication from Government as to what social housing providers will be permitted to increase rents by from 2025/26. The budgets are working on the assumption of continuing with the same method as the past five years, however, this could be subject to change.
2.5	Due to high inflation, CPI was 6.7% in September 2023, which results in social housing landlords having the ability to increase rents by up to 7.7% (6.7% CPI +

	1%). There has been no announcement from Government suggesting they will impose a rent increase cap, like they did for 2023-24.
2.6	The rent policy aims to strike a balance between the interests of existing social housing tenants who pay some or all their own rent, and the importance of ensuring that providers of social housing have sufficient income to manage and maintain their housing stock.
2.7	<p>Rent Setting is different depending on the type of rent set. There are three types of rents used within the HRA. Social Rent, Affordable Rent and Shared Ownership, as well as a small number of leased properties.</p> <p>The current breakdown of the stock by rent type as at 1 December 2023 is as follows:</p> <p>Social Rent: 4,264 Affordable Rent: 119 Shared Ownership: 16 Leased: 11 Total: 4,410</p>
2.8	Social Rent is described as all low-cost rental accommodation. Since 2001 social rents have been based on a formula set by Government. Annual updates to the formula calculations are published in November of the previous year.
2.9	Under the Rent Policy the initial rent may be set at a level no higher than formula rent plus rent flexibility. The formula rent takes account of relative property values, relative local earnings, and a bedroom factor, i.e. smaller properties should have lower rents. The formula rent is also subject to a rent cap. The rent cap applies a maximum ceiling on the formula rent. Therefore, if the formula rent is higher than the rent cap for a particular property, the rent cap must be used instead. The rent caps will increase each year by CPI (September of the previous year) plus 1.5%.
2.10	The Government's Rent Policy recognises that registered housing providers should have some flexibility over the rent set for individual properties, to take account of local factors. As a result, the Policy Statement contains flexibility to set rents at up to 5% above the formula rent (10% for supported housing). East Suffolk Council applies rent flexibility following approval by Full Council in January 2023.
2.11	The Government's Rent Policy states any social rents that exceed the flexibility level must not be increased by more than CPI (rather than CPI plus 1%) each year, until the rent is brought within the rent flexibility level. Also, the property must be re-let at the formula rent value (plus rent flexibility). If this arises when setting the HRA rents, the rent will be frozen or potentially reduced until it reaches the formula rent value. Such situations will be dealt with on a case-by-case basis.
2.12	Affordable Rent values were introduced in 2011 and must not exceed 80% of gross market rent (inclusive of service charges), i.e. rent for which the accommodation might reasonably be expected to be let in the private rented sector. The size, location and service provision must be taken into consideration.

2.13	Affordable rent is exempt from the social rent requirements of the Policy Statement. The Government expects new build properties to be let at affordable rent values. Affordable rent allows the Council to set rents at a level that are typically higher than social rents. The intention behind this flexibility is to enable local authorities to generate additional capacity for investment in new affordable homes. The Council is applying affordable rents to new build or purchased properties and can do so as it has an agreement in place with the Secretary of State. The agreement allows the Council to retain RTB receipts for investment in new affordable rented homes.
2.14	The private rented market can fluctuate from month to month. Therefore, the Council charges the Local Housing Allowance (LHA) rate for all affordable rents (inclusive of service charges). The LHA rate is less than 80% of market rent, but more than social rents. The LHA rate is the most a tenant can receive in benefits towards their rent, therefore anything charged over this value would need to be financed by the tenant's own resources, which could cause financial hardship and potential arrears.
2.15	An additional benefit to this approach ensures a consistent and fair approach to all tenants.
2.16	Affordable rents must not increase by more than CPI (September of the previous year) plus 1%. As with social rent setting, this is a ceiling and a lower increase, or to freeze or reduce affordable rents is permitted.
2.17	Full Market Rent can be charged by a social landlord from April 2015, where a social tenant has an annual household income of at least £60,000. This change allowed landlords to make better use of their social housing for properties rented to households with relatively high incomes. However, the HRA does not currently charge any tenants full market rent as very few tenants are in this position, and the cost to identify these tenants outweighs the benefit of the additional income.
2.18	Shared Ownership Rent is calculated at 2.75% of the share still owned by ESC. This is a nationwide calculation for the initial rent charged. Future year increases will follow the 2020 Rent Standard of the previous year's September RPI + 0.5%. For any shared ownership properties acquired on or after 12/10/2023 must have future year rent increases in line with CPI + 1%.
2.19	The Rent Period the Council works on is a 50-week period. The 52-week rent value is converted to the slightly higher 50-week value, allowing tenants to have two 'rent free weeks' over the Christmas period. This helps tenants at an expensive time of year, and for those in arrears, can help them 'catch up.'
2.20	A small number of HRA properties are used as temporary accommodation. These properties are charged at the 52-week value as they will not be in the property for more than a year, and therefore would not benefit from the rent-free weeks.
2.21	Every five to six years there are 53 Mondays in the rent year. 2024/25 is a 53-week rent year. Tenants will need to be aware of this if in receipt of UC as this is based

	on a 52-week rent year and the Government have yet to release a statement as to whether this will be changed considering the 53-week rent year.
2.22	Garage Rents do not follow the same restrictions as dwelling rents. These are based on market research in the district and have been considered for approval by Cabinet as part of the 2024/25 Fees and Charges Report.
2.23	Service Charges are those charges payable by tenants to reflect additional services which may not be provided to every tenant, or which may be connected with communal facilities, e.g. communal facilities in sheltered accommodation (Grouped Homes).
2.24	Councils can review their service charges annually. Service charges should be sufficient to cover the cost of providing the service and are not governed by the same factors as rents. Therefore, not all service charges will necessarily increase each year, they will replicate the cost of the service provided. As set out in the Policy Statement, increases for service charges should be managed, where possible, within the limit on rent changes of CPI plus 1%. Exceptions to this include new charges or where services have been extended.
2.25	Arrears 2022/23 had an increase on arrears from 2021/22 of £236,497.82. As at 31.03.23 arrears were 6.78% of total rents and charges raised. This was a 0.99% increase from the previous year.
2.26	The current arrears position as of 30 November 2023 is higher than the 2022/23 position. November and December traditionally show a higher arrears position due to the impending 2 'rent free' weeks at the end of December. Therefore, a more accurate and comparable position will be updated in the new year before the report is taken to Cabinet in February 2024.
2.27	Although the arrears position continues to rise, it is anticipated a high percentage of these arrears will be cleared because of the rents and service charge refund process. Arrears are required to be cleared before tenants are entitled to a refund. Reducing these arrears should help with managing the remaining arrears in the future.
2.28	To further reduce the risk of arrears, new tenants are asked to pay rent in advance. The amount they pay is linked to how regularly they pay their rent e.g. if a tenant pays weekly, they will be required to pay one week in advance. As of 30 November 2023, the HRA holds £738,855.54 in rent in advance.
2.29	Repairs and Maintenance The HRA repairs and maintenance (R & M) programme is split between capital and revenue. Revenue costs are to be funded from the revenue income derived from rents, whilst capital will be funded from the Major Repairs Reserve.
2.30	In recent years the budgets have been increased to consider the increase in material costs.
2.31	The HRA is currently undertaking a programme of essential safety inspections, primarily relating to fire safety and essential works identified during inspections. A

	report detailing the planned works was approved at Cabinet on 4 October 2022 and included in the 2023/24 budget setting. However, these increases to budget did not include provisions to meet the new Social Housing (Regulation) Act 2023 announced in July 2023.
2.32	Capital Programme The HRA capital programme forms part of the Council's 'Capital Programme Report 2024/25 to 2027/28'. The HRA capital programme consists of capital budgets for 'Asset Investment' and 'Acquisition and Housing Development.'
2.33	The HRA capital programme will be funded via the rental income it retains, also referred to as 'Direct Revenue Financing' (DRF), the Major Repairs Reserve, Right-to-Buy (RTB) receipts, external funding and other capital receipts held.
2.34	The repairs and maintenance aspect of the capital programme forms part of the 'Asset Investment Programme.' This element of the capital programme is funded through the MRR. The Asset Investment Programme not only covers repairs and maintenance, but also energy efficiency measures, fire safety, and redevelopment of existing housing stock.
2.35	The Acquisition and Housing Development element of the capital programme is the investment in purchasing and building new affordable housing to be held within the HRA. The current development programme has seen cost pressures associated with the increases across the construction industry.
2.36	As of the 31 March 2023, the Council's housing stock totalled 4,418. During 2023/24 there have been 10 RTB sales to date with more anticipated before the end of the year. However, there will be an additional 25 properties added to the stock through the acquisition and development programme giving a net increase to the stock levels for this year. 2024/25 will then see a decrease in stock levels due to the decant and demolition of St Peters Court.
2.37	Special Services are made up of revenue costs for Sheltered Schemes, Warden services, caretakers and acquisitions and new build programme. As the acquisitions and new build programmes increases, the associated revenue costs also increase. These costs include for example, architect fees, consultant fees, warranty insurance, marketing, and staffing.

3 How to address current situation

	Rents and service charges
	Rent Setting
3.1	In accordance with the Rent Standard for 2020, rent increases for 2024/25 will be increased by the September 2023 CPI plus 1%. September CPI was 6.7%, which gives a proposed rent increase of up to 7.7%.

	This is assuming Government does not cap social rent increases as they did for 2023/24.						
3.2	Official guidance has yet to be released by Government, but following the rent standard for 2020, the formula rent (a nationwide calculation) will be increased by the September 2023 CPI plus 1% regardless of the rent increase applied to current tenants. The Council has no option on this, and it will affect new tenancies only.						
3.3	ESC has a commitment to providing all tenants with a home at a decent home's standard, as well as investing in its existing housing stock to meet the Social Housing (Regulation) Act 2023, while building much needed new homes for those waiting on the housing register.						
3.4	The balance between service provision and protecting current tenants have been carefully considered, and a rent increase of up to 7.7% for 2024/25 is proposed in this report.						
3.5	The Government's proposed increase to the LHA rate and ESC rent policy to cap affordable rents at the LHA rate will help with the affordability of the rent increase proposed. If the new LHA rates for 2024/25 are less than a 7.7% increase, tenants on an affordable rent will see a lower increase to their rents.						
3.6	Rent setting takes place during February each year to ensure the most up to date rents are used as a base and reduces the chance of manual updates relating to properties re-let between February and March (before the new rent values apply). Also, the new LHA rates should be announced by February to aid the setting of the affordable rents.						
3.7	Applying a 7.7% rent increase in 2024/25, gives an average rent increase of £6.92 per week for social rented properties. Table B below shows the current average weekly rent value and the anticipated average for social rented properties in 2024/25. Table B <table border="1" data-bbox="300 1485 1046 1626"> <tr> <td>2023/24 Average Rent (52 Week Value)</td> <td>£89.86</td> </tr> <tr> <td>2024/25 Average Rent (52 Week Value)</td> <td>£96.78</td> </tr> <tr> <td>Average Weekly Rent increase (52 Week Value)</td> <td>£6.92</td> </tr> </table> <p>The table does not include averages for affordable rents due to the new LHA rate not being released yet, however these will also have a maximum of 7.7% applied.</p>	2023/24 Average Rent (52 Week Value)	£89.86	2024/25 Average Rent (52 Week Value)	£96.78	Average Weekly Rent increase (52 Week Value)	£6.92
2023/24 Average Rent (52 Week Value)	£89.86						
2024/25 Average Rent (52 Week Value)	£96.78						
Average Weekly Rent increase (52 Week Value)	£6.92						
3.8	The average rent for the East of England as provided by the HomeLet statistics for November 2023 is £1,223 per month. This is the equivalent to £282.23 per week. This equates to ESC 2023/24 average social rent being just 31.84% of the average rents for the area. The proposed 2024/25 ESC average social rent increases this to 34.29% of the average rent charged in the area.						
3.9	The ESC average rent value will fluctuate slightly week-to-week, depending on the number of voids and re-lets during a month. However, the change will be						

	minimum (a few pence different), and it is compared each year during December, giving a consistent approach.						
3.10	<p>Shared Ownership properties follow a slightly different set of guidance. Although the Shared ownership rent reform was introduced in October 2023, it only affects shared ownership properties purchased or built after this date, and therefore, does not impact on our current shared ownership properties.</p> <p>Shared Ownership properties are to increase by Retail Price Index (RPI) plus 0.5% each year. The September 2023 RPI was 8.9%, giving an increase to rents of 9.4%.</p>						
3.11	<p>Applying a 9.4% rent increase to shared ownership properties in 2024/25, gives an average rent increase of £17.54 per month. All Shared ownership properties are charged monthly as per the ESC rent policy. Their rents will vary depending on the valuation of their property and the percentage share bought. Table C below shows the current average monthly rent value and the anticipated average value for shared ownership properties in 2024/25.</p> <p>Table C</p> <table border="1"> <tr> <td>2023/24 Average Rent (Monthly)</td> <td>£186.56</td> </tr> <tr> <td>2024/25 Average Rent (Monthly)</td> <td>£204.10</td> </tr> <tr> <td>Average Monthly Rent increase</td> <td>£17.54</td> </tr> </table>	2023/24 Average Rent (Monthly)	£186.56	2024/25 Average Rent (Monthly)	£204.10	Average Monthly Rent increase	£17.54
2023/24 Average Rent (Monthly)	£186.56						
2024/25 Average Rent (Monthly)	£204.10						
Average Monthly Rent increase	£17.54						
3.12	Not increasing social and affordable rents by 7.7% or Shared ownership properties by 9.4% would put a financial strain on the HRA. With increasing demands and costs across all service areas, and the requirement for significant investment in the decarbonisation of the current housing stock and new build programme, the capital programme will suffer if rent increases are not utilised.						
3.13	<p>Due to the agreement ESC holds with the Secretary of State to retain its RTB receipts, the Council must invest in the provision of new affordable homes.</p> <p>However, the provision of new affordable housing is not a legislative or regulative requirement. If the Capital programme is required to reduce to balance the budget, the investment in new affordable housing would have to be reduced or removed. Any RTB receipts held would need to be gifted to other social housing providers as required by the agreement or returned to Government each year.</p>						
3.14	<p>Although Government have not announced a new settlement on how rents will be set for the period 2025/26 to 2027/28, the budgets have been based on the same methodology as the previous five-year arrangement. An increase of the September CPI plus 1%. The Bank of England (BoE) CPI predictions plus 1% have been applied to these years.</p> <ul style="list-style-type: none"> • 2025/26 (BoE) CPI 2.4% plus 1% • 2026/27 (BoE) CPI 2.1% plus 1% • 2027/28 (BoE) CPI 2.1% plus 1% <p>When the new settlement arrangement for these years is announced, an update will be added to this report.</p>						
3.15	Other factors are also taken into consideration when calculating the dwelling rent budget for future years. Such as disposals through RTB's or asset management of underperforming stock, reconversions, new build developments and acquisitions.						

3.16	The 2024/25 and future year income budgets take into consideration the decant and demolition of St Peters Court. This is a loss of £400,000 plus rent increases each year.
3.17	Service Charges The proposed service charges for 2024/25 are set out in Appendix C of this report. The costs of providing the services have been reviewed and set at a level to ensure that the costs are recovered. The HRA cannot make a profit on the service charges, these are purely to recover HRA costs.
3.18	Not all service charges, outlined in Appendix C will increase in 2024/25. This is due to contracts that run for more than one year for a fixed price.
3.19	The average grouped home service charge relates to services provided to sheltered schemes and communal utility costs. The proposed general service charge for grouped homes for 2024/25 is set at an average weekly charge of £19.31. This is an increase of £3.21 compared to 2023/24.
3.20	The average grouped home heating charge is based on the previous full year's cost and reflect the tenants use of utilities in their home. Due to using the previous year's full costs, tenants benefited from no major increases last year, however in fairness to all council tenants who pay for their own heating charges, the recharge should reflect the actual cost of their utility's usage. The proposed heating charge for 2024/25 is £23.71 per week (with 2 'rent free weeks'). This is an increase of £5.58 compared to 2023/24.
3.21	Due to the decant at St Peters Court, it was deemed inappropriate to increase any rents or service charges here, while tenants are waiting to be rehoused.
3.22	Garage Rents Garage rents are also set out in Appendix C . For 2024/25 tenant's weekly garage rent is proposed to increase from £9.45 to £9.73, an increase of £0.28 on the 2023/24 charge. The proposed increased for non-tenant weekly garage rent is £13.63 from £13.23 (inclusive of VAT), an increase of £0.40 on the 2023/24 charge.
3.23	The Garage rents are based on local market research. Historically, ESC has charged particularly low garage rents, however they are now at a similar level as other Local Council providers. Garage rents form part of the Councils' annual fees and charges report to be considered by Cabinet on 2 January 2024.
3.24	Repairs and Maintenance The repairs and maintenance revenue budget for 2024/25 has been set at £7.749 million, compared to a revised forecast of £6.782 million in the 2023/24 budget. An analysis of the repairs and maintenance revenue budget is set out in Appendix D .
3.25	The amounts included in the repairs and maintenance revenue budget are deemed sufficient to allow the Council to carry out all necessary major works and to maintain the decent homes standard in all its properties. It should also be sufficient to cover significant levels of work on fire risk safety, compliance contract

	management and stock condition surveys. The costs associated with the Government's target to ensuring all stock is EPC C or above by 2030 is within the HRA capital programme.
3.26	The 2024/25 budget includes increases to cover; additional compliance consultancy support, increased contract costs, increased budgets to tackle damp and mould and increased staffing budgets relating to compliance management.
3.27	Increased revenue costs associated with the decant of St Peters Court fall under special services as part of non-sheltered scheme costs. The decant and demolition has had a £500,000 impact on the 2023/24 forecasted outturn position and increased the 2024/25 to 2025/26 budgets by a total of £1,000,000. These additional costs were approved as part of the report to Cabinet on 3 October 2023. Although over 30 years this was the best financial option, these costs were not included in the original budget.
3.28	Other Budget Pressures and savings The acceptance of £4.2 million grant funding for the Brownfield Site Release Fund had additional costs associated with it. The total revenue impact was £518,000 between 2023/24 and 2025/26. Also, in addition to this, the HRA had to contribute a further £300,000 to the capital programme for the decontamination of the site.
3.29	Due to the size of the Deben fields new build development, the revenue costs associated with the build are much higher and outside of the existing budgets. Therefore, an additional £900,000 has been added to the budgets between 2024/25 and 2025/26.
3.30	Higher interest rates have given the HRA a boost on its interest income over 2023/24 and 2024/25, providing an additional £1.1 million, which will help contribute towards some of the budget pressures highlighted above.
3.31	Reserves and Balances The HRA has earmarked reserves as well as the HRA revenue working balance (see section 5.19 in Appendix A2 for details on the revenue working balance), and the Major Repairs Reserve. Appendix E shows the movement and balances of these reserves for the budget period 2023/24 to 2027/28.
3.32	Brownfield Land Release Reserve is a new reserve set up during 2023-24 for the grant funding received for the decontamination works at the former Sanyo site and will be spend in accordance with the grant agreement.
3.33	HRA Debt Repayment Reserve was set up in 2012/13. The viability of the self-financing regime depends ultimately on the Council acting prudently and in doing so, setting sufficient sums aside to meet its future liabilities. The transfer of funds to the Debt Repayment Reserve gives the Council flexibility around its future decisions for repaying the debt. The balance at 31 March 2028 is forecasted to be £3 million. This is after a planned repayment of a substantial debt instalment of £10 million in 2026/27. Payments into this reserve from 2027/28 will need to increase to meet the following instalment of £10 million due in 2031/32. Future

	debt repayment instalments will be funded by both the Debt Repayment Reserve and the MRR.
3.34	<p>During 2024/25 the HRA has significant cost pressures. To avoid short-term borrowing and increases in interest payments it is planned to release £1.8 million of the debt repayment reserve back into the HRA revenue account to balance the budget. This will then be replenished between 2025/26 to 2027/28.</p> <p>Any savings above the projected outturn for 2023/24 will be used to reduce the need to release funds from this reserve.</p>
3.35	<p>HRA DHP Top-Up Reserve (also known as the hardship reserve) was set up in 2012/13 with a fund of £500,000 taking the Welfare Reform Act 2012 into account. The reserve recognised the unexpected and exceptional difficulties tenants may face arising from these changes. Although the Act is now over ten years old, the financial difficulties tenants face has not faded.</p>
3.36	<p>This reserve was set up to ‘top up’ the Discretionary Housing Payments (DHP) made by the Council by the value used by HRA tenants, only if the total payments made were to exceed the value of the DHP grant received by the Council. To date, this has not been required. With increased Department for Work and Pensions (DWP) grant in recent years, it is unlikely to be required in 2023/24.</p>
3.37	<p>Due to the reserve not being required for its original purpose, discussions have been held, and the reserve is now being utilised for some staffing posts that will benefit out tenants when managing their finances. This includes a finance inclusion officer, and temporary staffing to guide tenants through their rents and service charge refund process as well as the decant at St Peters Court.</p> <p>The balance is estimated to be £114,000 at 31 March 2028 and will continue to be utilised in future years.</p>
3.38	<p>MMI Reserve is the Municipal Mutual Insurance Reserve. This reserve covers any potential insurance claims relating to when the Council was covered by this insurer, and the new insurance providers will not cover such claims.</p>
3.39	<p>Acquisition and Development Reserve is used to transfer in potential underspends during a given financial year, to later fund the acquisition and new build capital programme. The reserve is planned to be utilised between 2023/24 and 2024/25.</p>
3.40	<p>Major Repairs Reserve (MRR) was set up following the introduction of the self-financing on 1 April 2012 and to meet changes in Accounts and Audit Regulations from 2012/13. Depreciation charged to the HRA is credited to the MRR and can be used to repay the principal elements of the HRA debt, as well as finance capital expenditure on the existing dwelling stock. There are plans to use the MRR to part fund the capital programme in each financial year. The balance at 31 March 2028 is projected to be a £7.418 million. The balance of this reserve is monitored through the 30-year financial business model to ensure it remains at a balance sufficient to fund capital programme repairs and contribute to debt repayment in future years.</p>

3.41	The next debt repayment instalment of £960,000 in 2024/25 is planned to be financed by the MMR.
3.42	All reserves and balances are allocated to fund both the revenue and capital budgets, including repayment of debt in future years. Anything additional added to these proposed budgets will require borrowing to be taken out against the new build capital programme. However, this is subject to capacity in revenue budgets to cover additional interest payments and servicing new debt.

4 Reason/s for recommendation

4.1	This report brings together all relevant information to enable Members to review, consider and comment upon the Council's Housing Revenue Account budgets, the proposed rental increase, service and other charges and movements in reserves and balances, before making final recommendations to Full Council on 21 February 2024. This report also forms the basis of Scrutiny Committee's review of the Budget at its meeting on 18 January 2024 as required under the Budget and Policy Framework.
4.2	To advise Members of the wider housing and welfare changes that will impact on future service delivery.

Appendices

Appendices:	
Appendix A1	Budget changes to the financial period 2024/25 to 2027/28
Appendix A2	HRA 2024/25 to 2027/28 Budget – inclusive of 2023/24 forecast position
Appendix B	Summary of Headings on Chart of Accounts
Appendix C	HRA Service and other charges
Appendix D	HRA Repairs and Maintenance Revenue Budget
Appendix E	HRA Balances and Reserve Summary
Appendix F	HRA Budget Key Assumptions

Background reference papers:		
Date	Type	Available From
November 2023	Budget Working Papers	Financial Services
November 2023	Bank of England Monetary Policy Report November 2023	Monetary Policy Report - November 2023 Bank of England
November 2023	September 2023 CPI	Consumer price inflation, UK - Office for National Statistics (point 3)
November 2023	Increase in LHA rate from April 2024 (Details to follow)	Updated: Local Housing Allowance rates to rise from April 2024 Local Government Chronicle (LGC) (lgcplus.com)
Last updated 09/05/2023	Rent Standard 2020	Rent Standard and guidance - GOV.UK (www.gov.uk)
July 2023	Social Housing (Regulation) Act 2023	Social Housing (Regulation) Act 2023 (legislation.gov.uk)

Budget changes to the financial period 2024/25 to 2027/28.

Table D

HRA Budget update	2024/25	2025/26	2026/27	2027/28	Description
	£'000	£'000	£'000	£'000	
Additional Cost					
Direct Revenue Financing - source of finance for capital programme	4,442	1,652	0	0	Increase due to changes in Capital programme. Some Capital Grants and Reserve movements contra against these.
St Peters Court - Decant and Demolition	735	48	0	0	Revenue costs associated with the decant and demolition of St Peters Court (excludes staffing).
St Peters Court - Decant and Demolition (Staffing)	75	27	0	0	Additional Staffing Requirements during decant and demolition of St Peters Court.
Housing Development Programme	902	0	0	0	Additional revenue costs associated with Housing development.
Brownfield Land Release Revenue costs	496	22	0	0	Planning fees and project management of Brownfield Release. Costs to be recovered through land sale at end of project.
Additional Staffing Requirements	610	672	692	914	2 x Passive Fore Officers, 1 x Damp & Mould Officer, 1 x Senior Development Officer, 1 x Contract Manager - Electrical, Additional Admin Support, 0.4 x Disabled Adaption Manager, 1 x Policy Manager, 1 x Housing Improvement Officer, 1 x Tenant Engagement Officer and staff pay awards. 2027/28 base is 2026/27 budget.
Consultancy costs	372	75	50	0	External consultancy costs relating to HRA compliance.
Repairs and Maintenance service cost increase	298	402	415	428	Increase Material costs, increased cost of services and additional compliance works previously approved at cabinet.
running of schemes (sheltered and non- sheltered)	245	203	207	208	Increases in utilities bills for all schemes.
Rents, rates and other charges	130	19	0	0	Estimated Council Tax on voids at St Peters Court until demolition.
Depreciation charge	0	121	164	284	Depreciation is linked to the capital programme.
Insurance Premiums	36	44	51	58	External impact, insurance premiums have increased across the Council.
Provision for Bad Debt	35	21	19	16	Increase on provision for bad debt following the rent refunds processed.
Digital Transformation Programme	30	20	24	33	Increase in investment in analytical software and digital transformation programme.
Travel Expenses	16	16	16	16	Increase in travel costs with increased staff, vacancies filled and increased office working.
Tenant Engagement	11	11	11	11	Vacancy filled, increase investment in tenant engagement.
Corporate Subscriptions	11	11	11	11	House Mark increased annual fee.
	8,444	3,364	1,660	1,979	
Reduced Income					
Dwelling Rent income	412	426	440	453	Decant of St Peters Court.
Interest on cash balances	0	0	142	136	Forecasted reduced HRA balances in 26/27 & 27/28.
Non Dwelling Income (Leases and Wayleaves)	8	8	8	8	Reduced income due to demolition of St Peters court.
Reimbursement of costs	5	5	5	5	Reduced external use of Choice Based Letting Service.
Non Dwelling Income (Garage Rents)	3	3	4	0	Reduced number of Garages.
	428	442	599	602	

Additional Income					
Dwelling Rent income	-1,017	-635	-675	-1,198	7.7% increase applied to 2024/25. 2027/28 base is 2026/27 budget. BOI predicted CPI + 1% for 2025/26 to 2027/28.
Interest on cash balances	-299	-139	0	0	Increase in average interest received in 24/25 & 25/26.
Service charges and facilities income	-171	-176	-178	-204	Increase to recover costs of services.
Capital Grants and Contributions	-157	0	0	0	Homes England funding towards specific housing development. Contra against increase in DRF.
Contribution towards expenditure	-41	0	0	0	Reserve contribution to specific development sites.
Leaseholders Charges for Services	-5	-5	-5	-5	Improved recharging to leaseholders.
Non Dwelling Income (Garage Rents)	0	0	0	-1	27/28 base is 2026/27 budget. 3% increase applied.
	-1,690	-955	-858	-1,408	
Savings					
Direct Revenue Financing - source of finance for capital programme	0	0	-501	-2,465	Use of Capital Receipts in future years. 2027/28 base is 2026/27 budget.
Support recharge from General Fund to HRA	-205	-185	-179	-137	Support recharges reviewed to reflect the services used by the HRA.
Interest Payable and similar Charges	0	0	0	-302	Interest to reduce in 27/28 following repayment of debt instalment.
Housing Development Programme	0	-156	-91	-56	Revenue costs associated with Housing Development to reflect capital programme requirements.
Dwelling Rent Write-offs	-50	-50	-50	-50	Dwelling rent write off budget to reduce due to rent and service charges refunds.
Depreciation charge	-53	0	0	0	Depreciation is linked to the capital programme.
St Peters Court - Decant and Demolition - Staffing	-9	-37	-39	-39	Savings from posts currently filled by agency relating to St Peters Court.
St Peters Court - Decant and Demolition	0	0	-20	-20	Savings from removing the running costs of St Peters court (excludes staffing).
HRA Contribution to Treasury Management	-10	-11	-12	-17	Contribution reduces inline with HRA share of cash balances
Rents, rates and other charges	0	0	-11	-11	Once redevelopment programme progresses, charges for associated properties/sites will be removed.
	-327	-439	-903	-3,097	
Use of Reserves					
Debt Repayment Reserve	-1,800	200	450	1,150	Use of balance 24/25 to cover in year expenses. To be replenished between 25/26 to 27/28.
Brownfield Land Release Reserve	-1,000	-1,500	-1,704	0	Use of reserve to contra against increase in DRF. - Kirkley Water Front Decontamination.
Acquisition and Development Reserve	-1,486	0	0	0	Use of reserve to contra against increase in DRF. - Development Programme.
Hardship/DHP Top up Reserve	-49	-28	-29	-30	To fund a financial inclusion officer post.
	-4,335	-1,328	-1,283	1,120	
Net Total Movements	2,520	1,084	-785	-804	
Net Total Movements between 2024/25 and 2027/28				2,015	

5.1 Table D details the changes across each financial year, with a brief description for the change. All changes have been put through the 30-year business plan to ensure the financial viability of the HRA. There is no adverse effect to the long-term financial position of the HRA by making these changes, and no requirement to take on additional borrowing at this stage. However, if the proposed dwelling rent increase of 7.7% is not adopted, or further growth is added to the budgets, borrowing against the new build capital programme will be required or potentially reducing/removing the new build programme.

HRA 2024/25 to 2027/28 Budget – inclusive of Projected outturn for 2023/24

5.2 Table E summarises the 2024/25 budget through to 2027/28, with a projected outturn position for 2023/24. A brief description for each heading can be found in **Appendix B**.

Table E

	2023/24 Budget £'000	2023/24 Projection £'000	2023/24 Movement £'000	2024/25 Budget £'000	2025/26 Budget £'000	2026/27 Budget £'000	2027/28 Budget £'000
Income							
Dwelling Rent	(20,634)	(20,411)	223	(22,136)	(22,440)	(23,040)	(23,550)
Non-Dwelling Rent	(184)	(175)	9	(177)	(181)	(185)	(190)
Service & Other Charges	(732)	(750)	(18)	(911)	(924)	(946)	(972)
Leaseholders Charges for Services	(10)	(20)	(10)	(15)	(15)	(15)	(15)
Contribution towards Expenditure	(57)	(234)	(177)	(74)	(33)	(33)	(33)
Reimbursement of Costs	(68)	(80)	(12)	(64)	(64)	(64)	(64)
Capital Grants and Contributions	-	(4,926)	(4,926)	(157)	-	-	-
Interest Income	(276)	(1,083)	(807)	(575)	(415)	(134)	(140)
Total Income	(21,961)	(27,679)	(5,718)	(24,109)	(24,072)	(24,417)	(24,964)
10% of total income	(2,196)	(2,768)	(572)	(2,411)	(2,407)	(2,442)	(2,496)
Expenditure							
Repairs & Maintenance	6,935	6,782	(153)	7,749	7,773	7,923	8,071
Supervision & Management	3,724	3,862	138	3,777	3,713	3,801	3,904
Special Services	2,705	3,664	959	5,392	3,103	3,074	3,102
Rents, Rates and other Charges	143	188	45	243	131	101	102
Movement in Bad Debt Provision	-	(220)	(220)	34	21	19	16
Contribution to CDC	92	92	-	92	92	92	92
Capital Charges	4,191	4,206	15	4,633	5,100	5,397	5,511
Interest Charges	2,106	2,106	-	2,066	2,026	2,026	1,724
Revenue Contribution to Capital	3,400	6,411	3,011	6,579	3,452	3,199	1,235
Transfer to Earmarked Reserves	(38)	481	519	(4,375)	(1,328)	(1,283)	1,120
Total Expenditure	23,258	27,572	4,314	26,190	24,083	24,349	24,877
Movement in the HRA balance	1,297	(107)	(1,404)	2,081	11	(68)	(87)
HRA Balance carried forward	(3,066)	(4,470)	(1,404)	(2,389)	(2,378)	(2,446)	(2,533)

Highlights regarding 2023/24 revised position – Table E

Income

5.3 The reduction in dwelling rent is in relation to the decant of St Peters Court and delays in the new build development programme.

5.4 The small variation in non-dwellings is due to the reduction in the number of garages.

5.5 The small variation in service charges is minimal compared to the size of the budget.

5.6 The increased income on leaseholder charged is due to improved processes on recharging.

5.7 The increase on contribution to expenditure is a combination of:

- Refund on Stamp Duty Paid on properties for social housing over the last 4 years.
- Unexpected funding from the Government towards the new burdens of customer satisfaction measures.
- Additional contributions towards to project management of decontamination of the former Sanyo site.

5.8 Reimbursement on costs includes a one-off recharge for work completed in 2022-23.

5.9 Additional funding received in Capital Grants relates to:

- £4.2 million for the Brownfield release fund.
- £250,000 Suffolk County Council contribution towards the purchase of 2 properties for Homes for Ukraine's.
- £473,000 Homes England funding towards Milton Road new build development.

5.10 Increased interest income due to increased cash balances in year and higher interest rates.

Expenditure

5.11 Saving on Repairs and Maintenance in relation to in year vacancy savings.

5.12 Increased costs on Supervision and Management are in relation to implementation of new ICT software and agency staff for the rents and service charge refund process.

5.13 Increased costs on Special Services are due to the decant and demolition of St Peters Court, Consultancy fees and additional revenue costs associated with the Deben Fields Development.

5.14 The increase in rents, rates and other charges are increased Council Tax payments on void properties in St Peters Court.

5.15 The saving on Bad Debt Provision is based on the knowledge that rent arrears will be reduced due to the rents and service charge refund process.

5.16 The slight change to the Capital charges is the depreciation charge. This is transferred to the Major Repairs Reserve.

5.17 The increase in Revenue contributions to Capital are partly covered by the additional grant funding received (section 5.9), and the use of the acquisition and development reserve.

5.18 The increase to earmark reserves represents all earmark reserve movements that can be seen in detail on appendix E.

2024/25 to 2027/28 Budgets

5.19 Table E demonstrates a projected healthy HRA working balance at 31 March 2024. The balance is planned to be drawn down in financial years 2024/25 and 2025/26, to make best use of the funds, but always maintaining the required 10% minimum. Best practice is considered to have a minimum working balance that approximates to 10% of the total income received in one year.

5.20 There is a separate provision already set aside in previous financial years to cover all anticipated refunds through the rents and service charge refund process. This process will not impact on the proposed budgets.

SUMMARY OF HEADINGS ON CHART OF ACCOUNT**Income.**

- **Dwelling Rent;** Rental income from tenants for housing (Including Housing Benefits).
- **Non-Dwelling Rent;** Rental income for garages, and any other assets rented out by the HRA.
- **Services and other Charges;** Service Charges and nonspecific income.
- **Leaseholder's charges for services;** Recharges to Leaseholders for works and services.
- **Contributions towards expenditure;** External contributions towards expenditure.
- **Reimbursement of costs;** Rechargeable works to a third party.
- **Interest Income;** Interest received on cash balances held by the HRA.

Expenditure.

- **Repairs and Maintenance;** General Repairs and Maintenance to all housing stock.
- **Supervision and Management;** Costs associated with running the HRA, e.g. tenant's services, office-based staff, IT etc.
- **Special Services;** Sheltered schemes, warden costs, property acquisitions, redevelopment/decarbonisation, and new development revenue costs.
- **Rents, Rates, and other Charges;** Council Tax charges for void properties and Business Rates.
- **Movement in Bad Debt Provision;** Bad debt provision is to hold funds to cover debt (arrears) that are unlikely to be recovered by the HRA. Current Bad Debt provision is at £872k.
- **Contribution to CDC;** CDC is Corporate & Democratic Core costs. This is the HRA's contribution towards these.
- **Capital Charges;** Depreciation charged to HRA assets. (This is transferred to the Major Repairs Reserve. This can fund capital work or contribute to paying down the debt).
- **Interest Charges;** The interest payments relating to HRA borrowing.
- **Revenue contribution to Capital;** Capital expenditure is large repairs work such as 'replacing a kitchen' or building new properties. These are funded from either the HRA 'Revenue Contribution,' receipts held through the sale of assets (e.g. Right to Buy Properties), or other reserves and contributions.
- **Transfer to Earmark Reserves;** The HRA has several reserves, but the one used most frequently is the Debt Repayment Reserve. Money is transferred to this reserve each year to pay off the debt held by the HRA.

HRA SERVICE AND OTHER CHARGES

The following charges are based on a 50 week collection year. Under current policies, the following increases/(Decreases) in charges are proposed for 2024/25.

	Average Weekly Charge 2023/24 £	Average Proposed Weekly Charge 2024/25 £	Average Weekly Increase/ (Decrease) £
<u>Grouped Homes Service Charges (average):</u>			
General Service Charge	16.10	19.31	3.21
Heating Charge	18.13	23.71	5.58
Communal Water Charge	1.71	2.29	0.58
Support Charge	3.33	3.33	0.00
Laundry	3.90	3.90	0.00
	Weekly Charge 2023/24 £	Proposed Weekly Charge 24/25 £	Weekly Increase/ (Decrease) £
<u>Caretaker:</u>			
St Peter's Court	7.15	7.15	0.00
Dukes Head Street	5.30	5.45	0.15
Chapel Court	3.75	3.86	0.11
<u>Servicing:</u>			
Septic Tank Emptying/Servicing	5.83	6.12	0.29
Flue Maintenance	2.53	2.71	0.18
Grounds Maintenance (average) *	1.39	1.42	0.03
* Cost vary depending on size of land to maintain.			
<u>Other:</u>			
Communal Area Cleaning Service (average) **	2.55	2.67	0.12
** Cost vary depending on number and size of communal areas.			
	Weekly Charge 2023/24 £	Proposed Weekly Charge 2024/25 £	Weekly Increase/ (Decrease) £
<u>Garage Rents:</u>			
Tenants	9.45	9.73	0.28
Non Tenants (net of VAT)	11.03	11.36	0.33
			(13.63 inclusive of VAT)

HRA REPAIRS & MAINTENANCE REVENUE BUDGETS

	2023/24	2023/24	2024/25	2025/26	2026/27	2027/28
	Approved	Forecast				
	Budget	Outturn	Budget	Budget	Budget	Budget
	£	£	£	£	£	£
Responsive Maintenance						
Supervision and Management (See note 1 below)	2,365,500	2,745,800	2,997,200	3,069,300	3,088,500	3,094,900
Compliance Consultancy	120,000	110,500	196,700	0	0	0
Compliance Contract Management (See note 2 below)	331,500	356,400	647,600	691,600	716,900	737,900
Jobbing Repairs	1,350,000	1,050,000	1,100,000	1,152,500	1,207,600	1,265,500
Loft and Cavity wall Insulation (See note 3 below)	50,000	35,000	0	0	0	0
Tenant Paint Allowances	40,000	25,000	31,500	33,100	34,800	36,500
Relet Repairs (Voids)	925,000	755,000	807,500	846,900	888,200	931,600
Asbestos - Removal	80,000	155,000	150,000	150,000	150,000	150,000
Asbestos - Testing	95,000	35,000	60,000	60,000	60,000	60,000
Legionella	10,000	35,000	50,000	50,000	50,000	50,000
Internal Communal Areas (See note 4 below)	60,000	0	60,000	60,000	60,000	60,000
Solid Fuel and Heating Repairs	33,000	33,000	34,500	36,100	37,800	39,500
Electrical Testing & Repairs	200,000	200,000	200,000	200,000	200,000	200,000
Emergency Lighting	0	80,000	35,000	35,000	35,000	35,000
External Decoration (See note 4 below)	100,000	40,000	150,000	150,000	150,000	150,000
Roof and PVC Panelling Cleaning (See note 5 below)	25,000	0	0	0	0	0
Fire Fighting Equipment and Detection	17,000	62,000	20,000	20,000	20,000	20,000
Fire Risk Assessments	9,800	20,000	37,400	27,900	17,400	11,800
Fire Alarm Servicing	0	23,300	24,000	24,700	25,400	26,200
Solar Panel and Sprinkler Servicing	0	6,200	7,300	8,400	6,000	7,000
Installation of CO2 detectors (See note 6 below)	0	23,700	0	0	0	0
Stock Condition Survey (See note 7 below)	0	155,000	0	0	0	0
Lift servicing, maintenance and installation	55,000	50,000	56,700	58,400	60,200	62,000
Disabled Adaptations	30,000	45,000	30,000	30,000	30,000	30,000
Door Porter and Security Systems	20,000	25,000	20,000	20,000	20,000	20,000
Environmental Works/Energy Efficiency software	7,500	7,500	7,500	7,500	7,500	7,500
Drainage and Pumping Stations	9,600	9,600	9,600	9,600	9,600	9,600
Mutual Exchange	10,000	10,000	10,000	10,000	10,000	10,000
Rechargeable Works - Incl's Leaseholder Properties	40,000	40,000	40,000	40,000	40,000	40,000
Servicing Contracts & Repairs	486,000	469,000	536,000	552,000	568,500	585,500
Total Responsive Maintenance	6,469,900	6,602,000	7,318,500	7,343,000	7,493,400	7,640,500
Planned Maintenance	£	£	£	£	£	£
Chimneys	20,000	10,000	10,000	10,000	10,000	10,000
External Walls, Boundary and retaining walls	60,000	35,000	60,000	60,000	60,000	60,000
Canopy's and Porches	15,000	0	0	0	0	0
Paths / Hardstanding	250,000	50,000	180,000	180,000	180,000	180,000
Outbuildings	40,000	10,000	20,000	20,000	20,000	20,000
Structural / Damp / Drainage / etc (See note 4 below)	80,000	70,000	160,000	160,000	160,000	160,000
Total Planned Maintenance	465,000	175,000	430,000	430,000	430,000	430,000
Total HRA Housing Repairs	6,934,900	6,777,000	7,748,500	7,773,000	7,923,400	8,070,500

Notes:

Note 1 - Supervision and Management of the Repairs and Maintenance Team, unrecoverable cost, stock and equipment.

Note 2 - New Contract Compliance Team managing compliance contracts including fire safety.

Note 3 - Previously a £50,000 revenue budget held. This has been replaced with a £500,000 Capital Budget to focus investment in this area.

Note 4 - Programme of works being worked up during 2023-24 to be implemented from 2024/25 onwards.

Note 5 - Roof cleaning to be combines with external dec works. Not required to be held separate.

Note 6 - Fitting of CO2 Detectors - most of the work was completed in 2022-23, remaining balance paid in 2023-24.

Note 7 - Work planned for 2022-23, now being completed in 2023-24, and contract extended to cover more properties.

Appendix E

HRA BALANCE AND RESERVE SUMMARY

HRA WORKING BALANCE

		2023/24 Movements			2024/25 Movements			2025/26 Movements			2026/27 Movements			2027/28 Movements			Closing Balance 31/03/28	
		Closing Balance 31/03/23	Transfer In	Transfer Out	Closing Balance 31/03/24	Transfer In	Transfer Out	Closing Balance 31/03/25	Transfer In	Transfer Out	Closing Balance 31/03/26	Transfer In	Transfer Out	Closing Balance 31/03/27	Transfer In	Transfer Out		
		£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000		
HRA Working Balance	60999-98652	-4,363	-	107	0	-4,470	-	2,080	-2,390	0	12	-2,378	(68)	-	-2,446	(87)	-	-2,533
10% Requirement	(Exc interest income)	-2,085			-2,167			-2,338				-2,366			-2,429			-2,482

HRA EARMARKED RESERVES

		2023/24 Movements			2024/25 Movements			2025/26 Movements			2026/27 Movements			2027/28 Movements			Closing Balance 31/03/28
		Closing Balance 31/03/23	Transfer In	Transfer Out	Closing Balance 31/03/24	Transfer In	Transfer Out	Closing Balance 31/03/25	Transfer In	Transfer Out	Closing Balance 31/03/26	Transfer In	Transfer Out	Closing Balance 31/03/27	Transfer In	Transfer Out	
		£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	
Debt Repayment Reserve	60791-ER0400	-13,000	-	-	-13,000	-	1,800	-11,200	(200)	-	-11,400	(450)	10,000	-1,850	(1,150)	-	-3,000
HRA DHP topup Reserve	60791-ER0405	-499	-	209	-290	-	89	-201	-	28	-173	-	29	-144	-	30	-114
MMI Reserve	60791-ER0410	-60	-	-	-60	-	-	-60	-	-	-60	-	-	-60	-	-	-60
Acquisition & Development Reserve	60791-ER0420	-5,000	-	3,514	-1,486	-	1,486	-	-	-	-	-	-	-	-	-	-
Brownfield Land release Reserve	60791-ER0431	0	(4,204)	-	-4,204	-	1,000	3,204	-	1,500	1,704	-	1,704	-	-	-	-
Brampton Sinking Fund	60791-ER0430	-2	(1)	-	-3	(1)	-	-4	(1)	-	-5	(1)	-	-6	(1)	-	-7
Total HRA Earmarked Reserves		-18,561	-4,205	3,723	-19,043	-1	4,375	-14,669	-201	1,528.00	-13,342	-451	11,733	-2,060	-1,151	30	-3,181

HRA CAPITAL RESERVE

		2023/24 Movements			2024/25 Movements			2025/26 Movements			2026/27 Movements			2027/28 Movements			Closing Balance 31/03/28
		Closing Balance 31/03/23	Transfer In	Transfer Out	Closing Balance 31/03/24	Transfer In	Transfer Out	Closing Balance 31/03/25	Transfer In	Transfer Out	Closing Balance 31/03/26	Transfer In	Transfer Out	Closing Balance 31/03/27	Transfer In	Transfer Out	
		£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	
HRA Major Repairs Reserve	98499-60010..60999	-15,780	(4,174)	4,092	-15,862	(4,605)	8,404	-12,063	(5,073)	10,498	-6,638	(5,370)	5,290	-6,718	(5,490)	4,790	-7,418

HRA BUDGET KEY ASSUMPTIONS

The following key assumptions have been made in the budgets.

Income	2024/25	2025/26	2026/27	2027/28
Dwelling rents annual increase (see paragraph 3.16)	7.7%	3.4%	3.1%	3.1%
Allowance for voids - % of total rent roll	1.3%	1.3%	1.3%	1.3%
Garage rents annual increase	3.0%	3.0%	3.0%	3.0%
Charges for services & facilities annual increase *	N/A	3.00%	3.00%	3.00%
Write-off allowance **	£0	£50,000	£50,000	£50,000
Number of dwellings lost through Right To Buys (RTB's)	15	30	30	30
Number of dwellings lost to demolition	0	90	0	0
Number of new dwellings added to the stock	25	81	20	31
Average interest rate on HRA balances	4.00%	3.00%	3.00%	2.00%

Expenditure

Bad Debt Provision

Due to the rents and service charge refunds an assumption has been made that there will be a reduction in the bad debt requirement during 2023/24, and then a small increase has been added for future years. This will be revised each year.

* The 2024/25 service charges have varying increases, see Appendix C. 3% has been applied to future years inline with increased budget costs.

** No write-off allowance is included in 2024/25 while the rent and service charge audit is being carried out and potential refunds are to be processed.



CABINET
Tuesday, 02 January 2024

Subject	People Strategy 2024–28
Cabinet Member	Councillor Paul Ashton Cabinet Member with responsibility for Corporate Services – Digital, Customer Services, HR and Assets
Report Author(s)	Kate Blakemore Strategic Director Kate.Blakemore@eastsoffolk.gov.uk Amie Skeet HR and Workforce Development Manager Amie.skeet@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:

East Suffolk Council's People Strategy has been in place since November 2021, spanning the period 2021-24.

The purpose of this report is to present to Cabinet the Council's updated People Strategy for the period 2024-28.

Options:

- 1) To approve the People Strategy 2024-28 as set out in Appendix A.
- 2) To make amendments to the People Strategy 2024-28 as set out in Appendix A and to subsequently approve the amended strategy.
- 3) To not approve the People Strategy 2024-28.

Recommendation:

A People Strategy is a strategy that guides every aspect of the employee-employer relationship and is critical for attracting, engaging, training, and retaining talented employees in the workplace. This strategy has been developed by our workforce and reflects the needs of our People.

Cabinet is asked to approve the People Strategy 2024-28 as set out in Appendix A of this report.

Corporate Impact Assessment

Governance:

The delivery of the People Strategy 2024-28 will be supported by a detailed action plan that outlines the activities that will happen to ensure we deliver against this strategy over the next three years.

ESC policies and strategies that directly apply to the proposal:

In adopting this People Strategy, several internal policies and procedures will be updated, the majority of which will be held by the Council's Human Resources department.

Environmental:

None

Equalities and Diversity:

Equalities, Diversity, and Inclusion is covered as a standalone section within the People Strategy outlining how we will seek to achieve inclusion and equality within our workplace. No negative impact on any of the characteristics protected under the Equality Act 2010 are identified because of this strategy.

Financial:

There are no direct financial implications identified as part of this strategy, any costs associated with the action plan will be addressed through normal budget setting processes.

Legal:

Not applicable.

Risk:

This People Strategy seeks to address the ongoing risks associated with recruitment and retention of staff, alongside ensuring our policies and procedures are up to date from a People point of view.

External Consultees:

Non-external, but wide internal engagement and consultation was undertaken as part of developing this strategy.

Background and Justification for Recommendation

1 Background

1.1	A People Strategy is a strategy that guides every aspect of the employee-employer relationship and is critical for attracting, engaging, training, and retaining talented employees in the workplace.
1.2	Our People Strategy 2021–2024 was focussed on supporting the organisation’s people as the Council underwent rapid transformation following on from the creation of East Suffolk Council
1.3	It was developed by engaging with staff across the organisation and, nearly three years later, it’s appropriate to review and reflect on our delivery against the current strategy whilst working towards the development of an updated version.

2 Introduction

2.1	In developing this People Strategy 2024-28 several workshops were held with staff across the organisation, including face to face staff drop-in sessions held across our operational sites, engagement with our Corporate Leadership Team, Managers, Health and Safety and Wellbeing groups.
2.2	These sessions focussed on what people liked about working for East Suffolk, and what they would want to protect in terms of a People Strategy. The sessions also explored challenges and asked for feedback in terms of any barriers that prevented people from doing a good job.
2.3	As the number of sessions increased common themes and priorities started to emerge. These have been captured as part of developing the People Strategy 2024-28.

3 People Strategy 2024–28 Themes and Priorities	
3.1	Our last People Strategy 2021–2024 outlined three strategic themes: developing our people, leadership, and culture.
3.2	Feedback from the workshop sessions was very much centred around these themes still feeling relevant to the Council. However, it was questioned whether the people and leadership theme should be combined, in that what we expect from our leaders should essentially be what we expect from everyone.
3.3	As a result of this feedback, the People Strategy 2024-28 has two themes, and whilst based on the previous strategy, they differ in terms of the priorities which sit under each of these themes.
3.4	The first theme is People. It is about ensuring we put our people at the heart of everything we do. We want to unlock the full potential in every individual, collectively supporting service areas and teams to deliver the best outcomes they can for our residents.
3.5	Five priorities have been identified within this theme. These are: <ul style="list-style-type: none"> • Wellbeing • Ways of Working • Tools and Resources • Recruitment and Retention • Connectivity
3.6	The second theme is Culture. Culture is about our organisation’s beliefs, values and attitudes and how we are recognised by our employees, residents and stakeholders.
3.7	In continuing to build on our culture of being an inclusive, flexible, positive and welcoming place to work, five priorities have been identified. These are: <ul style="list-style-type: none"> • Values • Communication • Reputation • Relationships • Consistency

4 Governance	
4.1	This People Strategy sets out our two themes and priorities for our people over the next four years. It is important that we deliver against this strategy, and that progress can be easily evaluated and reported.
4.2	To ensure we deliver against this strategy a yearly action plan will be developed so we can be clear about what we will be doing and what outcomes will be achieved.
4.3	We will also undertake regular staff surveys, using the feedback from these surveys to ensure this strategy remains relevant and that the actions we commit to undertake are making a positive difference.

5 Reason/s for recommendation	
5.1	A People Strategy is a strategy that guides every aspect of the employee-employer relationship and is critical for attracting, engaging, training, and retaining talented employees in the workplace.

5.2	The People Strategy 2024-28 is the Council's updated people strategy, reflecting the needs of our people over the next three years and has been developed working with people across East Suffolk Council to ensure it fully reflects our workforces needs.
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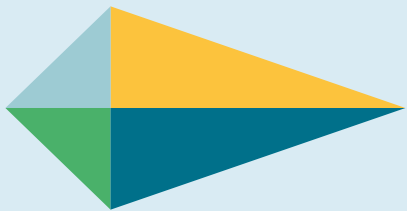
Appendices

Appendices:	
Appendix A	People Strategy 2024-28

Background reference papers:	
None.	

People Strategy

2024 - 2028



EASTSUFFOLK
COUNCIL

INTRODUCTION

Here at East Suffolk, we are determined to ensure that we attract, develop and retain talented people, committed to delivering the best possible outcomes for our communities and stakeholders.

Our people, and the people we hope to attract, are critical to the successful function of East Suffolk Council and we are justly proud of the effort and commitment of our teams across the organisation.

A high quality People Strategy is a key part of this, creating the culture, processes, and policies that enable us all to thrive.

Our last People Strategy (2021 – 2024) focussed on supporting the organisation through rapid transformation, following the creation of East Suffolk Council, and much has been achieved.

However, the Council continues to evolve, responding to significant challenges such as the Covid 19 pandemic and the cost-of-living crisis. None of this would be possible without the Council's dedicated workforce.

Now, as the current strategy reaches the end of its cycle, a new approach has been developed, by our people, with the next four years in mind.

We want to ensure that East Suffolk Council continues to provide the best possible environment for its workforce between now and 2028, ensuring we have the tools to deliver against the Administration's ambitious agenda, responding to any challenges we may face in an agile and progressive way.

DEVELOPMENT

This People Strategy has been developed following staff engagement sessions which were held during September 2023. Representatives from all service areas and levels of staff have engaged with this process, through a mixture of face-to-face and online workshops.

Feedback from these session has informed the development of this strategy and, as a result, we have two strategic themes with key priorities sitting underneath each of them.



THEME 1: PEOPLE

We will ensure that we put our people at the heart of everything we do. We want to unlock the full potential in every individual, collectively supporting service areas and teams to deliver the best outcomes they can for our residents. To do this we have identified five priorities within this theme:



Wellbeing



Ways of Working



Tools and Resources



Recruitment and Retention



Connectivity



Reputation



Values



Communication



Relationships



Consistency

THEME 2: CULTURE

Culture is about our organisation's beliefs, values and attitudes and how we are recognised by our employees, residents and stakeholders. We are an inclusive, flexible, and welcoming place to work, and to build on this, five priorities have been identified:



EQUALITY, DIVERSITY & INCLUSION

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

This 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 Equality, Diversity and Inclusion is integral in all that we do.



What we hope to achieve in the next four years

- Ensure staff feel valued, included and able to raise issues.
- Increase knowledge, awareness and understanding of Equality, Diversity and Inclusion and the 10 'protected characteristic' groups for all staff.
- Ensure our recruitment processes are genuinely accessible and attract a diverse workforce that represents the local population.
- Provide opportunities for staff to share lived experience, leading to increased visibility and understanding.
- Ensure that all staff have a positive experience working for the Council, providing new staff with a welcoming environment where everyone is included and valued.
- Identify and challenge discrimination, including racism.
- Ensure that all our workplaces are accessible.
- We will seek to become a Disability Confident Leader.

THEME 1: PEOPLE



Wellbeing

The health and wellbeing of our employees is paramount, they are our best assets. This is no longer simply a 'nice to have', it is crucial that we always invest in our employees, enabling them to be happy, healthy, and resilient in the workplace.

Context for the priority

We have been through unprecedented times over the past three years which have challenged our employees, physically, socially, financially, and mentally. More than ever, as their employer, we have a duty of care to ensure we support them in these key areas.

In our recent Emotional Needs survey carried out by Suffolk Mind, we received some positive feedback, with most employees stating that we are meeting their needs well. However, there were areas that we can improve on: developing a greater sense of community and improving physical wellbeing, in particular around sleep (especially for Port Health shift workers), but also what we eat and how much we move around when we are at work.

Why the theme is important to our staff?

We know that by prioritising health and wellbeing we can help reduce stress and help to create positive working environments where our employees can thrive in an open and supportive culture. It directly impacts employee engagement, sickness absence and retention rates.

We already have a well-established Wellbeing group, as well as a wealth of wellbeing initiatives in place through our employee assistance programme. However, we know that we can do more and want to build on the great stuff we already do, achieving measurable outcomes through improved retention and sickness rates and through feedback from our staff surveys.

What we hope to achieve in the next four years

- Develop a wellbeing strategy, reaching out to each service area and understand what support they need from our wellbeing provision.
- Appoint a health and wellbeing lead to drive this agenda forwards.
- Continue to analyse stress assessments and sickness data to see where we can be more proactive in supporting our staff.
- Gather and review data to enable us to identify stress and mental health triggers, taking action to reduce sickness and improve wellbeing.
- Ensure employees across all service areas and locations have access to the same health and wellbeing support regardless of localised barriers.



Ways of Working

We are committed to providing flexible ways of working for our employees while meeting the needs of the organisation. We recognise how important flexibility and a good work/life balance is to individuals' wellbeing.

Context for the priority

East Suffolk Council has always been a flexible organisation, however the way we currently work was accelerated as a response to many of the Covid 19 pandemic challenges. Looking forward, we want to remain agile as we continue to respond to the needs of our residents.

Feedback from colleagues shows us that flexibility is critical to helping us balance our working and home lives, but as a dynamic and changing workplace we need to review these practices regularly to ensure we get this balance right.

Why this theme is important for our staff?

Our people told us how important flexibility is for them. It supports carers, those with health issues and disabilities and those who have their own personal life priorities, giving individuals the autonomy to make their own decisions about when and where they work best.

However, this flexibility has also created unintended consequences. People have told us that the shift to working from home means it is not clear when they should be in the office and that they miss the social aspect of coming into the office.

Our managers told us they are unsure about asking someone to come into the office. Managers say some of their employees are anxious about returning to the office: with new team members finding working from home difficult, they need to feel part of a team.

When people do come in, they may feel they can't work as well in the office. Sometimes there is not enough space for conversations that are not always suited to open plan; or their work disturbs other people, especially when using Teams.

Most people talked about the "always on" culture, saying they felt that they are always 'online' and that emails can be overwhelming. We need to find a better balance between flexibility and business need.

What we hope to achieve in the next four years

- Undertake a full review our policies and procedures around flexible ways of working to ensure the balance we are seeking between individual and business needs is better achieved.
- Learn from what others are doing and embed best practice in terms of our approach to flexible ways of working.
- Ensure there are opportunities for all to collaborate face to face with their colleagues.
- Address the "always on culture" by developing good practice guidance and ensuring that the "My Conversation" process provides an opportunity to discuss workloads and expectations.



Tools and Resources

Ensuring our employees have the right tools and resources to do their job well will mean they can deliver for the Council, but more importantly, it will improve job satisfaction. If we don't provide the right tools, we may set our employees up for failure. Having the right tools for the job is essential, in absolutely every line of work. Whether your job is office based or skilled labour, you'll want to have the right equipment to hand to keep your work moving. It is more than just making sure we all have desk space and a working laptop!

Context for the priority

Tools and Resources can be anything from the necessary skills and training, enough resources and capacity, through to having a hard hat and shoes.

It's important to regularly review your tools, ensuring your tools are still fit for the job. This will apply to your skills and job knowledge too as they can become dated. This is especially true if industry methods change, or new laws are introduced.

In our safety-critical areas of work, with the right tools at your disposal, you're better protected from workplace hazards and accidents. Since many pieces of equipment are built with specific functions in mind, using the wrong ones can create situations that put you and others at risk. Therefore, by having the proper tools, you are improving employee safety.

Why this theme is important for our staff?

Whilst we have been told that we mostly have access to the correct tools and resources, we can become frustrated when things don't work or go wrong. We also need to think about business continuity.

There was a recognition that the Council is continuously evolving; that what was suitable a few years ago may no longer be. Working practices may have changed and or advancements in areas such as technology means that more effective solutions could be used.

What we hope to achieve in the next four years

- Work across service areas to understand the tools and resource needs of our staff, understanding what is working, what isn't working and what is missing.
- In developing this understanding, seek to improve access to the right tools and resources to better help our staff do the best they can.





Recruitment and Retention

Recruitment allows you to identify the talented individuals that will make up your team, and retention allows you to hold onto those talented individuals. East Suffolk is an amazing place in which to live and represent. The Council is an inclusive, flexible, and welcoming employer - we hear this regularly through staff feedback. We need to communicate this to potential candidates in an increasingly competitive job market.

Context for the priority

LGA Local Government Workforce Survey 2023 showed more than nine out of ten local authorities are experiencing staff recruitment and retention issues, which, in turn, is driving an unsustainable reliance on agency staff. Post-pandemic these challenges are growing, with increased turnover and demand for niche skill sets across the Council.

Why this theme is important for our staff?

Discussions at the focus group sessions demonstrated the importance of recruitment and retention. Questions were raised around why we can't always attract specialist staff. Staff recognise that recruitment of candidates with the right skill sets and attitudes is vital. Appointing high quality staff reduces the stress of covering unfilled vacancies and ensures we have the capacity to do the job well.

Vacancies put pressure on teams and our staff understand that the Council needs to recruit and retain talented employees to maintain high levels of productivity, engagement, job expertise, and customer satisfaction. It also helps the Council build a positive image with customers and potential recruits.

Staff sometime feel that there is a lack of career opportunities and further progression within the Council. Staff recognition was also raised – there is scope to do more to say thank you.

“I’ve been working here for over 20 years – there really is nowhere else I want to work”

What we hope to achieve in the next four years

- We will continue to promote our East Suffolk brand which creates a positive image of the Council as an employer, using this in all recruitment initiatives.
- We will target job adverts to reach individuals with the skills and attitudes we need.
- We will extend the use of social media which can target specific talent pools using a diverse range of groups, filters, and hashtags to attract higher-quality candidates.
- We will appoint a Strategic Recruitment Partner to support our approaches to recruitment and retention.
- We will build on our apprenticeship programme and develop a robust work experience scheme.
- We will introduce improved 'onboarding' giving new employees the best possible start, with the confidence to quickly take on their responsibilities and to engage with colleagues.
- We will investigate why valued staff are leaving and what we need to do to retain them.
- We will provide continuous training and opportunities for growth.
- We will look ahead and develop career pathways to address potential future recruitment shortages, succession planning and improved career development opportunities for our staff.
- We will review the employee recognition programme to ensure our employees feel seen and valued. We will always encourage employee feedback and act on it.





Connectivity

Employees are committed to making a difference to the residents and communities we serve, and want to feel connected to the place, understanding their role in helping to make a difference.

Context for the priority

Local government employees contribute to the local community whatever their role is. Working in local government gives you the opportunity to not only develop your career, but also to make a difference in people's lives. This is often the reason for people choosing to work for the Council, so it is important, whatever the role, that there are opportunities to feel connected to East Suffolk, and that everyone understands their contribution to this.

Why this theme is important for our staff?

Staff said they believe in the power of local government to make a real difference for local people, but that some roles are less connected, especially the more corporately focussed services such as finance and human resources.

Many staff live locally, and they want to spend their working hours doing something that makes their local community a better place to be, for example staff enjoy the opportunity to undertake volunteering work whilst working for the Council.

What we hope to achieve in the next four years

- In adopting 'Our Direction 2028', our new Strategic Plan, service plans will enable every service area to understand how they contribute to the strategic direction of the Council.
- Through the 'My Conversation' process every member of staff will understand what their priorities and objectives are, and how they feed into the strategic direction of the Council.
- We will build on the marketplace days to showcase the work of all service areas and teams, to share knowledge and increase a shared understanding of how we are collectively making a difference to East Suffolk.

Our team ethos is great, we will always help each other.

THEME 2: CULTURE



Values

Values capture the guiding principles we expect every employee to embody and steer how our organisation operates. They inform the expected behaviours of all our people and reflect our culture.



Context for the priority

Our values were developed by a “natural work team” formed of a cross section of staff. A programme of workshops, focus groups and open sessions took place, covering why values are important, and thinking about what was important to staff. Our values were embedded as East Suffolk Council was formed.

Why this theme is important for our staff?

Feedback from the engagement sessions tells us that staff like the values, still feel they’re relevant and that they create a sense of belonging to East Suffolk Council.

Managers in those sessions told us they feel the values are well embraced throughout the organisation, including by new starters.

In our 2023 staff survey most staff stated that they understood the Council’s vision and values, and how they contributed to achieving them.

What we hope to achieve in next four years

- We want to check in – do these values still reflect how we see ourselves as an organisation? Do they still embody the way we want to work?
- We will continue to ensure that these values are communicated widely throughout the organisation – even the best values won’t be embedded if we don’t communicate them effectively.
- We will talk about our values with everyone as part of our “My Conversation” process, highlighting ways of working that demonstrate these values in practice, and provide support and guidance if more is required in adopting these values by individuals.



Communication

Communication is important in all that we do. There are many ways we can communicate, so it's about understanding that different methods of communication are suitable for different messages, depending on what we are trying to convey. Communication is also about how we listen to and respond to feedback.

Context for the priority

Good organisational communication builds trust, boosts engagement and establishes stronger working relationships. It ensures everyone has a voice at all levels. Communication is also about feedback; we need feedback to continue to improve and grow. Effective communication can help staff to feel a sense of belonging by understanding how they contribute to the organisation.

Why this theme is important for our staff?

Throughout the engagement sessions staff raised communication in both positive and negative ways. Staff recognised there are many ways in which information is shared, however staff felt that sometimes they missed important messages and did not always have time to look at SharePoint for example, to understand what is happening. Some staff stated they didn't even have access to SharePoint.

What we hope to achieve in next four years

- We want to get the balance right between the various communication methods we use, depending on the message being conveyed.
- We want to ensure that communications are timely and relevant for our staff.
- We want to ensure that all communication is presented in a way that is easily understood by all.
- We want to stay up to date with the ways we can communicate with staff, identifying and adopting best practice.





Reputation

Feedback from the People Strategy engagement sessions, and other staff feedback mechanisms such as surveys and exit interviews, confirms that the Council's reputation, both internally and externally, is extremely important to staff. Internally, staff place a high value on East Suffolk Council being a good employer and a great place to work. Externally, the public perception of the Council really matters to staff, not only as an employer, but in terms of the services the Council provides to the district.

Context for the priority

Working for an organisation with a positive reputation is important as it will have a significant impact on:

- Job satisfaction – how happy, motivated and engaged staff feel in their own role and the part they play in the services the Council provides.
- Personal performance – being motivated to perform well, be a high achiever, develop and progress with the Council.
- Individuals' mental health, wellbeing and general morale.
- Recruitment and Retention – wanting to work and stay working for the Council with a good reputation.

Why this theme is important for our staff?

“Negative comments about the Council on social media can really get to me” – this was said at one of the people strategy engagement sessions.

Staff said they wanted to feel able to talk about working for the Council outside of work, and that the Council's reputation was key to feeling whether they could do this or not.

Staff felt that East Suffolk Council does have a good reputation, but there was still some work to do in terms of residents' perceptions of what the Council does and how it works.

What we hope to achieve in next four years

- See increased customer satisfaction rates as measured through customer surveys.
- A reduction in complaints and negative reviews.
- Enhanced social media presence – increased followers, likes, shares and positive reviews.
- We want to increase individual and team job satisfaction across all service areas, as measured through regular employee surveys, feedback sessions, one to ones, and reduction of grievances and complaints.



Relationships

We form relationships with our colleagues within our own and other teams as well as with our elected members and external partners; forming good relationships is fundamental to our “sense of self” and our engagement with our employer and our workplace.

Good relationships in the workplace not only produce higher levels of morale but also have a positive knock-on effect on productivity and allow time and space to focus on opportunities, innovation and creativity.

Context for the priority

Relationships at work, how they are developed and how they make people feel, are always a prominent theme in any focus groups. The importance of relationships scores highly in our engagement surveys.

Relationship building in the workplace can give you freedom, motivation, and peace of mind. The more comfortable your employees are with each other, the more confident and motivated they will be. Relationships are crucial in all that we do, whether it’s working with external stakeholders, elected Members or directly with your colleagues.

Why this theme is important for our staff?

Feedback from the engagement sessions backs up how important good relationships in the workplace are to our staff. Staff said:

- They love the camaraderie, us all working as a team.
- They felt that good relationships are meaningful and increase the sense of self-worth.
- That good relationships provided an opportunity to learn from others.

However, they also told us that we need to work on the relationships between and across teams and on how we share information and work on projects together.

What we hope to achieve in next four years

- We will aim to maintain and where appropriate increase the good relationships that staff have with each other and their line managers.
- Management development will include elements on relationship building – rapport, listening, coaching, trust and respect.
- We will ensure that staff are provided with regular opportunities to meet with their teams in person and their line manager on a regular basis.



Consistency

We deliver a varied range of services which require our employees to work differently depending on the services' needs. However we need to ensure we are consistent in the way we lead, support and manage our staff irrespective of the service area they work in.

Context for the priority

To provide a variety of services to our customers, we need to deliver consistent leadership, management and support for our people. When we aren't consistent, we can cause frustration in the workforce. Where we can't be consistent we need to be transparent about the reasons why.

Why this theme is important for our staff?

Our people have told us that, in some teams, flexibility is managed differently than in other teams, and that management approaches to policy and procedures differs. 20% of our employees are managers so achieving consistency is important.

The opportunities to progress are not clear, not everyone has had a My Conversation objective-setting session. In some areas, it is felt reward and recognition is inconsistent and training opportunities are not always a priority.

What we hope to achieve in next four years

- We will develop all our managers so they can be the best they can be, providing them with the right tools and skills to enable them to provide consistent leadership and management.
- We will establish a managers' forum to enable our managers to collaborate and share good practice.
- We will review our reward and recognition schemes and promote our wide range of benefits as a total rewards package.
- We will commit to ensuring every member of staff has an annual objective session and six-monthly review. This will provide an opportunity for two-way feedback.

I love the flexibility offered to me by East Suffolk Council

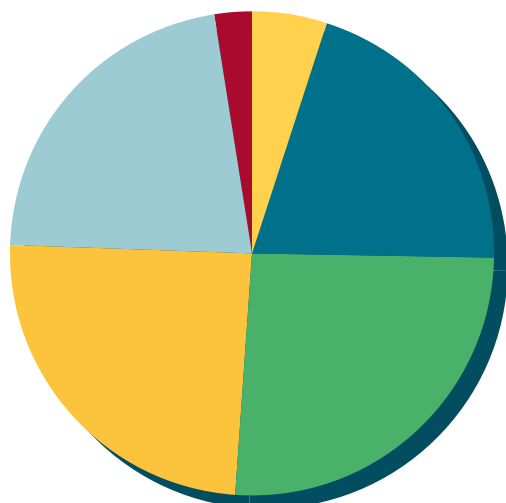
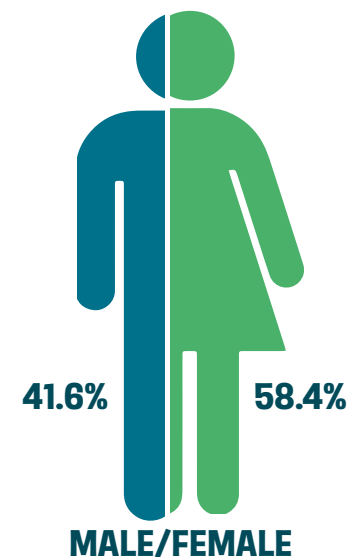
GOVERNANCE

This people strategy sets out our two themes and a number of priorities for our people over the next four years. It is important that we deliver against this strategy, and that progress can be easily evaluated and reported.

Therefore, we will develop a yearly action plan where we can be clear about what we will be doing and what outcomes will be achieved in line with this Strategy.

We will also undertake regular staff surveys, using the feedback from these surveys to ensure this strategy remains relevant and that the actions we commit to undertake are making a positive difference.

OUR WORKFORCE DATA (2023 Context)



AGE RANGE

16 - 24	5.2%
25 - 34	20.2%
35 - 44	25.8%
45 - 54	24.4%
55 - 64	21.9%
65+	2.5%





CABINET
Tuesday, 02 January 2024

Subject	Sea Link Nationally Strategic Infrastructure Project – Statutory Consultation Response
Cabinet Member	Councillor Tom Daly Cabinet Member with responsibility for Energy and Climate Change
Report Author(s)	Nick Harding Sea Link Project Lead nick.harding@eastsoffolk.gov.uk 07484327658 Naomi Goold Energy Projects Manager Naomi.goold@eastsoffolk.gov.uk 01394 444535
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Director	Nick Khan Strategic Director Nick.khan@eastsoffolk.gov.uk 01394 443200

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:	Aldeburgh & Leiston Kelsale & Yoxford Saxmundham

Purpose and high-level overview

Purpose of Report:

To provide a response to the statutory consultation for this nationally significant infrastructure project (NSIP). To get agreement that the Head of Planning & Coastal Management be given delegated authority, in consultation with the relevant Cabinet Member(s) to undertake all further activities in relation to the Sea Link project during the pre-application, examination and post examination/consent phases including the signing of any legal agreements/memorandum of understandings.

Options:

To not agree the consultation response. To not agree to provide the requested delegated authority.

Recommendation/s:

1. That the consultation response as set out in Appendix A be agreed.
2. That authority be delegated to the Head of Planning & Coastal Management, in Consultation with the relevant Cabinet Member(s), to act on behalf of the Council in all activities associated with the pre-application, examination and post examination/consent phases of the project including the signing of any legal agreements/memorandum of understandings.

Corporate Impact Assessment

Governance:

The constitution is such that a response to the statutory consultation is made via Cabinet. However, for NSIPs such as Sea Link, the consultation deadlines are short and can be frequent such that it is not considered feasible in the future to provide timely responses and engage appropriately with the project in addition to meeting the timelines associated with Cabinet meetings. It is essential that the Council can respond in an agile way to the project, to enable the views and position of East Suffolk Council (ESC) to be represented, therefore additional delegation is being sought.

ESC policies and strategies that directly apply to the proposal:

The applicant has stated that the project is required to reinforce the national grid network and in part to accommodate the additional anticipated generation coming to the region, some of which includes renewable energy. The potential benefits of grid reinforcement alongside some temporary economic benefits must be considered against the disbenefits involving the impact on the ecology, landscape, heritage, coastal management, amenity and quality of life in the district and well as tourism.

Environmental:

The impacts of the proposal are considered in the report.

Equalities and Diversity:

Currently there is insufficient information to determine if the proposal impacts disproportionately on any groups in the district.

Financial:

Engagement with the project during the pre-application, examination and post consent phases will have implications for the Council's resources. Negotiations are currently taking place with the applicant to secure a Planning Performance Agreement.

Human Resources:

ESC officers will be engaged in future consultations on the project, at the examination and during the post consent phases with the implementation of the project, if consented.

ICT:

None

Legal:

The Council will require legal representation when the project reaches examination stage. The project may result in the Council being party to a legal agreement in respect of securing adequate mitigation or compensation for the impacts of the proposal.

Risk:

None

External Consultees:

The applicant is the body responsible for consulting on the project rather than ESC. However, officers held a virtual meeting with the directly affected Parish and Town councils so that an understanding of their concerns could be heard and considered as part of the drafting of the Council's response. A note of that meeting has been included in the consultation response to the applicant.

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 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 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 checked="" type="checkbox"/>
P23	Protection, education and influence	<input type="checkbox"/>	<input type="checkbox"/>
T06	Governance		
	How ESC governs itself as an authority	<input type="checkbox"/>	<input type="checkbox"/>
<p>How does this proposal support the priorities selected?</p> <p>The applicant has stated that the project is required to reinforce the national grid network, and in part to accommodate the additional anticipated generation coming to the region, some of which includes renewable energy. The potential benefits of grid reinforcement and with it some temporary economic benefits must be considered against the disbenefits involving the impact on the ecology, landscape, heritage, coastal management, amenity and quality of life in the district and well as tourism.</p>			

Background and Justification for Recommendation

1 Background facts	
1.1	<p>The Council has received a statutory eight week consultation (24 October to 18 December 2023) from National Grid Electricity Transmission (NGET) for the Sea Link NSIP. The project proposes:</p> <ol style="list-style-type: none"> 1. An above ground connection from the overhead electricity lines near Friston to a proposed new substation near Friston (if the substation already consented under the East Anglia One North and East Anglia Two projects is constructed then this can also serve Sea Link). 2. Below ground HVAC connection from the substation to a proposed converter station near Saxmundham. 3. Below ground HVDC connection from the converter station to the coast near Aldeburgh. 4. Undersea cable to Kent <p>The project is said to be required in order to be able to transfer energy to and from Suffolk and to and from Kent.</p> <p>It should be noted that the submitted consultation material indicates the potential to site/co-locate converter stations for the Lionlink and Nautilus interconnectors adjoining the site to the east of Saxmundham</p> <p style="text-align: center;">See Appendix B for a more detailed map of the proposals.</p>
1.2	<p>As an NSIP, the Council is a statutory consultee in the process. The Secretary of State for the Department of Energy Security and Net Zero is the decision maker following an examination and the consideration of a report from an appointed Examining Authority which is provided and managed by the Planning Inspectorate.</p>

1.3	This consultation is the opportunity to make the applicant aware of the Council's views on the proposal and the work undertaken by the applicant so far on the Environmental Impact Assessment.
1.4	The Council had to provide a response to the eight-week consultation by 18 December 2023 due to that being the close of the consultation period. A draft response (see Appendix A) was prepared by officers, having been agreed by Councillor Tom Daly, as the relevant Cabinet Member and submitted. This report is seeking the confirmation of Cabinet that response submitted is acceptable or to be agreed with amendments. The applicant has agreed that the final response can be provided by 5 January 2024 to allow for consideration at this Cabinet meeting.

2 Current position

	National Plan for / Co-ordination of Energy Projects
2.1	<p>Members will be aware that there are a number of energy projects, either consented (Sizewell C, East Anglia One North, East Anglia Two, East Anglia Three), or proposed (Nautilus, Lion Link – both interconnector schemes, North Falls and Five Estuaries) as well as Sea Link, being considered/delivered in this part of East Suffolk. The Council has previously stated following the Motion to Full Council in September 2023 that the government should seek :-</p> <ul style="list-style-type: none"> • 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
2.2	The Secretary of State has not yet responded to that letter sent following Full Council but this proposal amplifies again that there is the need for better national planning and co-ordination of all these energy projects such that the best possible decision and outcome for communities, and the environment, can be achieved having regard to the need to upgrade our energy infrastructure.
2.3	It is acknowledged that the principle of subsea interconnectors is a key part of an offshore focused approach. However, the full outcomes of the Offshore Coordination Support Scheme (OCSS), and the review of connections in East Anglia, which is to be undertaken by National Grid Electricity System Operator, are unknown. Therefore, the proposals related to this project could be subject of significant change.
2.4	On 5 December 2023 it was announced that North Falls, Five Estuaries and Sea Link had been successful in receiving grant funding from the OCSS. The purpose of the funding from the OCSS is to enable the exploration of coordination between the two offshore wind farms and Sea Link. Given the association between Sea Link, LionLink and Nautilus, the opportunity for co-ordination created by the funding has been significantly limited. Whilst the Sea Link proposal has endeavoured to plan for a degree of co-location, there remains the concern regarding the lack of co-ordination and strategic planning, not least as each of the projects is being

	proposed by different organisations on the basis of different timetables. The Council's objections and disappointment on these issues therefore remains.
2.5	<p>Need For The Project</p> <p>The project is said to be required in order to be able to transfer energy to and from Suffolk and to and from Kent. However, in respect of exporting energy from Suffolk and Suffolk grid reinforcement, the need for the project only arises once Sizewell C, LionLink and Nautilus all come online (the latter two are not yet consented). Therefore, and notwithstanding the concerns the Council raises if Sea Link is consented, its implementation should be conditional on the other three projects all being committed for implementation. With regard to the Kent perspective, Sea Link serves to reinforce the south coast grid but it is not considered that it has been adequately demonstrated that reinforcement by a means other than Sea Link is not possible. It is also considered that alternatives to the project, such as an offshore grid and use of brownfield sites, have not been considered. Again, the Council remains disappointed that there has been no real demonstrable approach by the government or the energy companies to address the many issues highlighted affecting the east Suffolk communities.</p>
2.6	<p>Overview of ESC's position on Sea Link</p> <p>ESC currently objects to the Sea Link project as it would result in further unacceptable harm to the communities, environment and economy of East Suffolk and it is not yet considered that the timing of the need for the project is currently proven, and with Sizewell C potentially at least 10 years away from generation, it is requested further consideration of alternative offshore solutions is undertaken and consider that the project does not currently include sufficient levels of coordination in all areas of the NSIP process. In reaching this position the submitted plans showing the possible siting of converter stations adjacent to the proposed converter station for this project amplify the coordination/cumulative impact concerns.</p>
2.7	<p>Preliminary Environmental Information Report (PEIR)</p> <p>Notwithstanding the concerns with the principle of the proposal as already stated, there is the need for the Council to consider the technical aspects of the scheme. PEIR's are often included in the first statutory consultation document on an NSIP proposal. It is usual for the assessments to have some gaps within them. This has been the case here. As such officers have not been able to form a full and final opinion on whether the various environmental impacts of the proposal are within acceptable limits or not. Below are the main points that officers wish to make in relation to the PEIR. A very high level summary of the comments on the project has been provided in the following paragraphs, full details are available in Appendix A of this report.</p>
2.8	<p>Coastal processes</p> <p>The impact of the cables arriving to shore have not been assessed. This is a significant omission within the environmental information provided. This is hugely</p>

	disappointing, especially given the sensitivities of the East Suffolk coastline and the erosion rates that have been seen recently. This section of coast is managed by the Environment Agency but as ESC has responsibility for managing the coastal frontages to the north and south of the landfall, it is essential that we are informed of the findings of coastal change/management impact assessment.
	Operational Noise & Vibration
2.9	Officers are working with the applicant to ensure that the impacts are appropriately assessed. The starting point for ESC at the converter site is to seek a below background sound rating level, it is welcomed that the applicant has stated that it is their intention for the development to achieve this. Due to the low background sound levels in this area, particularly at night, it is extremely important that noise levels from the development are prevented, mitigated or minimised to ensure these background sound levels are not subject to “noise creep”.
2.10	ESC does not agree with the scoping out of the substation at Friston on the basis that the switchgear noise emissions would be impulsive in character and operation would be infrequent. Insufficient justification has been provided to support this decision. This substation is subject of a site rating level imposed by East Anglia One North and East Anglia Two DCOs, therefore NGET needs to be very confident that the introduction of a further or different equipment will not impact that constraint.
2.11	ESC will be engaging further with the applicant on operational noise to ensure the amenity of the area and local residents is protected. Significant more technical detail has also been provided in Appendix A.
	Construction Noise & Vibration
2.12	The use of BS5228 – Code of practice for noise and vibration control on construction and open sites along with the ABC methodology within that code, is accepted. The working hours however set out in the Outline Code of Construction Practice (OCoCP) identify Saturday working at 07:00-17:00. ESC does not currently consider that Saturday afternoon working is acceptable. Saturday working hours of 07:00-13:00 were set as part of the East Anglia One North and East Anglia Two projects and should be complied with on the Sea Link project. It is welcomed that the applicant intends to use Best Practicable Means (BPM) which is a critical control point and therefore any noise mitigation carried out with BPM will ensure noise and vibration is kept to a reasonable minimum. ESC would however welcome further discussions with the applicant on the impact methodology utilised in the environmental assessments.
	Interproject cumulative effects
2.13	ESC is concerned that only the peak year has been used as a basis for assessment and so there may be impacts from Sea Link prior to the cumulative peak predicted year which should be considered and also the impact of timeline slips in regard to the project’s overlap with other NSIPs. It is already evident that some of the dates provided for the commencement of NSIPs in the cumulative assessment are not

	accurate. The methodology utilised for the scope of the projects included within the cumulative impacts assessment needs to be reconsidered.
2.14	<p>Air Quality</p> <p>ESC notes that a detailed air quality assessment will be carried out at the Environmental Statement (ES) stage once further data is available. It is understood that at this stage Non Road Mobile Machinery (NRMM) will be considered further, however the Council would like to see a commitment to reduce emissions from this source which should include commitments to use renewable energy sources alongside Stage 4 NRMM as a minimum and Stage 5 where possible. Further specific details are provided within the Council’s response in Appendix A.</p>
2.15	<p>Landscape</p> <p>There are clear concerns in relation to the potential landscape impacts of the converter station site to the east of Saxmundham. Regarding the identified visual receptors, the Council has concerns about some of the value assessments given to some of the selected viewpoints as the rationale for attributing ‘medium value’ to some public rights of way and ‘high’ and ‘very high’ to others is not wholly clear. It is recommended that the developer discusses these issues with the Council before the Landscape and Visual and Impact Assessment is progressed any further.</p> <p>The applicant should engage with officers to ensure a collaborative ongoing dialogue in respect of landscape mitigation matters. The preliminary assessment is not clear on the role of mitigation planting in moderating the magnitude of effects over time. Photomontages/wireframes will need to include depictions of mitigation planting at Year 1, Year 5 and Year 15 post planting.</p> <p>Multiple different access options have been set out in the consultation material. In term of the proposed accesses and their impact on landscape:</p> <ul style="list-style-type: none"> • Southeastern Access 1 Redhouse Farm - This option would seem likely to be of least landscape impact, but it still carries risk to hedgerows and landscape character. • Northern Saxmundham Access 2 off B1121 - This option will have direct impacts on Carlton Park which is a locally listed historic parkland, on Tree Preservation Orders, roadside hedgerows and the setting of the Saxmundham Conservation Area. • Southern Saxmundham Access 3 off B1121 - This option will have direct impact on the Fromus valley landscape, willow woodland block, and roadside hedgerows. <p>With regard to any proposed accesses onto the highway, these will need to be presented with accurate and realistic visibility splay requirements.</p>
2.16	<p>Design & Heritage</p> <p>The heritage assessment is considered incomplete as several heritage assets have not been considered or assessed. Notwithstanding this, there are clear concerns regarding the potential impact of the converter station in relation to the setting and appreciation of a number of heritage assets. Where assets have been assessed</p>

	it is considered that in a number of cases the setting of heritage assets has been underplayed.
2.17	<p>Ecology</p> <p>There is still a great deal of survey and assessment to be undertaken by the applicant. A trenchless technique for laying the cable at the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI) and RSPB North Warren Reserve is proposed but there are doubts over the deliverability of this given the nature of the environment. If it is deliverable, the risk of ‘frack out’ of the drilling compound/material (e.g., bentonite) and the associated impacts need to be assessed. It has been stated that the Leiston-Aldeburgh SSSI is in the same location as Sandlings SPA which is not the case, and it cannot be assumed that measures potentially suitable for avoiding or mitigating impacts on SPA qualifying features are also suitable for SSSI features. ESC is also concerned about the applicant’s assumption that replanted hedges will deliver their mitigation within a 2-year timeframe and therefore consider the operational impacts of the development on ecology have potentially been underplayed.</p>
2.18	<p>Tourism & Economy</p> <p>The proposal has the potential to significantly impact on the tourism economy of the district as an individual project but also in combination with proposed and consented schemes promoting energy infrastructure. Equally, the project has the potential to provide jobs and skills advancement for residents. More information needs to be provided so that the Council can consider the issue appropriately.</p>
2.19	<p>Community Compensation</p> <p>In the event that the development is consented by the Secretary of State, then it is important that the communities impacted are appropriately compensated. The Council would welcome an early discussion with the applicant on this matter. It is important to stress that whilst the Government is looking at putting in place a formal system for providing community compensation this does not excuse the need for projects to be both environmentally acceptable and have the impacts adequately mitigated in the first instance.</p>

3 How to address current situation

3.1	The Council has been formally consulted by the applicant on the Sea Link proposal as part of the NSIP process. The Council should, and needs, to respond to the consultation especially given its status as a “host authority”. Given the deadline for submitting comments (18 December 2023) being prior to the Cabinet meeting (2 January 2024), officers have sent the response in Appendix A, in consultation with Councillor Daly as a preliminary response pending confirmation by Cabinet.
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3.2	Officers will seek to engage the applicant in relation to the concerns which have been identified within the PEIR and seek to ensure that these are addressed within the development consent application if it is subsequently submitted.
3.3	Due to the short timeframes and frequency of deadlines provided for NSIP consultations and responses during the consenting process, the recommendation includes a request for full delegation going forwards during the pre-application, examination and post consent phases of the project for the Head of Planning and Coastal Management to make decisions in consultation with the relevant cabinet member. This will ensure that the Council is able to fully engage with the applicant and project in order to minimise the disbenefits of the project and seek the best outcomes for east Suffolk.

4 Reason/s for recommendation

4.1	<p>The Council objects to the proposed grid reinforcement proposals because:</p> <ul style="list-style-type: none"> • There are concerns in respect of the principle of the proposal in that there continues to be a piecemeal approach to what is a nationally important issue. Whilst the proposal includes some elements of co-location, a greater degree and certainty of coordination is necessary. • It is not satisfied that there is not a technically deliverable solution for establishing reinforcement opportunities through better offshore coordination, and notwithstanding this the proposal of itself and in combination with other projects would have a detrimental impact on the communities, environment and economy of this part of the district. <p>The need for the Sea Link scheme is triggered when three other schemes are implemented (two of these do not actually have consent). The project is predicated on the delivery of Sizewell C and other works which would not be generating/transmitting collectively for at least 10 years. In this regard, and notwithstanding the objections to the proposal if Sea Link is consented, the implementation should be conditional on the other projects being committed. In this way there is a greater chance that Sea Link is implemented at the same time as the other projects so that the communities and environment are disrupted a single time rather than on three separate occasions.</p> <p>Another reason why Sea Link is needed is to reinforce the grid on the South Coast. It is not considered that alternative options for reinforcement have been considered.</p>
4.2	The consultation material published by the applicant has been reviewed by the relevant specialist teams within the authority and the comments that were forthcoming have formed the basis of the technical elements of the proposed response. As the project progresses through the consenting process, it is appropriate for the Council to engage with the applicant to ensure that in the event the scheme is consented by the Secretary of State, the impacts of the project are appropriately mitigated and if appropriate compensation provided in addition to ensuring the community is appropriately compensated.

4.3	There will be a future time for comments in the form of Relevant Representations on the proposal when it is submitted to the Planning Inspectorate for examination. In addition to this during the examination there will be multiple unrelenting deadlines to meet and if consented, requirements to discharge during the post consent phase. By virtue of the number and frequency of deadlines it is not possible to present reports to Cabinet seeking agreement on each occasion. Delegated authority is therefore being sought to allow the Head of Planning & Coastal Management to respond and fully engage in the pre-application, examination, and post consent phases of the process, including the signing of any legal agreements/memorandums of understandings in consultation with the relevant portfolio holder on behalf of Cabinet.
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Appendices

Appendices:	
Appendix A	Response to the statutory consultation
Appendix B	Locations plans for the cable route, substation and converter station

Background reference papers:		
Date	Type	Available From
24 October 2023	National Grid Sea Link Consultation Material	Sea Link National Grid ET

APPENDIX A



Response of East Suffolk Council to National Grid Electricity Transmission Statutory Consultation on the Sea Link Project

1.0 Introduction

- 1.1 East Suffolk Council (ESC) welcomes the opportunity to provide comments on the proposals for the Sea Link project. The Council's comments have been set out below.
- 1.2 During your consultation ESC held a meeting with the directly affected town and parish councils to seek their views on the project. The views expressed have been included in ESC's response. It was clear during the meeting that there is no town or parish council support for the proposal currently being consulted upon. A copy of the notes from the meeting held with directly affected town and parish council representatives has been provided at the end of this report.

2.0 Engagement on the Sea Link Project

- 2.1 ESC wishes to highlight at an early stage in this response concerns in relation to the engagement on the project. Whilst the higher-level project overview meetings on Sea Link have been scheduled regularly throughout the pre-application period, the detailed engagement on a technical level has been extremely limited and inadequate. Ahead of the statutory consultation ESC would have expected technical officers to be regularly engaged in all the thematic areas but this has not been the case. Whilst a limited number of meetings have been held with technical officers, these have been insufficient in number and depth and there has not been the appropriate opportunity to feed into the assessments and preliminary environmental information. In relation to some vitally important topic areas, there has been no engagement at all, these include coastal processes, ecology, surface water drainage and flood risk and air quality. The engagement with ESC in relation to the technical details of the project must be improved going forwards. In addition to this, engagement with the local communities is also essential and should be a key feature of the pre-application phase.

3.0 National Policy

- 3.1 The Energy National Policy Statements (NPSs) were updated in November 2023 with the publication of revised NPSs EN-1 to EN-5. ESC notes that EN-1 identifies that *"there is an urgent need for new electricity network infrastructure to be brought forward at*

pace to meet our energy objectives” (paragraph 3.3.65), in addition to this it is noted that the “volume of onshore reinforcement works needed to meet decarbonisation targets is substantial”, specifically noting the need for “substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation” (paragraph 3.3.68). Distribution Network Operators are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economic proposals in terms of network design. However national policy is clear that “in considering the ‘economic and efficient’ approach the network project needs to follow good design, avoidance and mitigation principles as reference in EN-5” (paragraph 3.3.78).

- 3.2 Paragraph 3.3.80 of EN-1 goes on to state “...considering the potential or unwarranted and avoidable disruption, inefficient, and visual impacts along the onshore-offshore boundary, coordination of onshore transmission, offshore transmission, and offshore generation and interconnector developments should be considered at both the strategic and more detailed project design levels. This coordinated approach is likely to provide the highest degree of consumer, environmental, and community benefits.”
- 3.3 Therefore, whilst EN-1 recognises the need for new electricity networks in order to meet the future energy demands, the importance of good design and need for coordination to reduce the adverse impacts on the local communities and environment is acknowledged. The revised NPS EN-5 supports need for coordination stating that “The coordinated solutions assessed should seek to be ambitious in the degree of co-ordination, wherever possible”.

4.0 Offshore Transmission Network Review and Coordination

- 4.1 The Council has been engaging with the Government regarding the unstructured and non-collaborative approach to energy development which the revised NPSs seek to address¹. ESC would like to be supportive of well-developed and designed coordinated projects that enable the goal of Net Zero and the interim targets, as set out in the revised NPSs. This however is not currently the case with projects delivered in a piecemeal fashion with little regard for the cumulative impacts, this cannot continue to occur at the expense of Suffolk’s environment and communities. The succession of individual proposals impacting our communities without visible strategic over-sight, or collaboration to minimise impacts, creates a very challenging and unsustainable situation. The Offshore Transmission Network Review (OTNR) was announced in 2020 following recognition by Government that the current un-coordinated approach to offshore transmission lacked any strategic vision and was causing significant environmental and local impacts from the associated onshore infrastructure. It was recognised that point to point connections do not always provide the most efficient

¹ [Strategic engagement » East Suffolk Council](#)

approach and could become a major barrier to delivery. This is a matter which ESC has been highlighting and calling for action on from the Government since 2018.

- 4.2 ESC has previously requested National Grid PLC comprehensively and robustly explore every opportunity for coordination of the Sea Link, EuroLink and Nautilus projects at all stages of the development consent process². It is also imperative given the pressures this area of east Suffolk is facing, that in-combination effects with other proposed and consented projects are considered and opportunities for coordination maximised. This is necessary to reduce the adverse impacts of the developments on east Suffolk's sensitive and valued environment and the local communities, who have been hit by a constant barrage of energy projects and will be subject to years of disruption from associated construction works, if they are consented and implemented.
- 4.3 ESC requests that consideration be given to an offshore grid solution and the use of brownfield solutions for the onshore infrastructure. The principle of subsea interconnectors is an important part of an offshore focused approach, but it needs to be ensured the connections are made in the right locations.
- 4.4 On 5 December 2023 it was announced that North Falls, Five Estuaries and Sea Link had been successful in receiving grant funding from the OCSS. The purpose of the funding from the OCSS was to enable the exploration of coordination between the two offshore wind farms and Sea Link. Given the association between Sea Link, LionLink and Nautilus, the opportunity for co-ordination created by the funding has been significantly limited. It is unknown whether there will be further funding granted for other projects as part of the OCSS, but at present the outcomes of the OTNR more generally, and the limitations on the potential benefits from the OCSS, has been extremely disappointing for east Suffolk. Put simply, the Sea Link project will receive funding to explore coordination with two offshore wind projects which had revised grid connections in Essex and therefore whilst there will be a potential reduction in the infrastructure overall the benefits will primarily be felt in Essex, it is not evident that there would be any reduction in the onshore infrastructure within east Suffolk.
- 4.5 ESC would like to understand the proposals put forward by Sea Link as part of the OCSS bid and to understand the implications for the current proposals put forward in the consultation. ESC would also like to be fully engaged and kept up to date on the work proposed to be undertaken as part of the OCSS funding, seeks further details on timescales for this work, implications for the consenting timeframe and details of anticipated further consultations on the proposals as a result.

² Dear [Click and type Name] ([eastsoffolk.gov.uk](mailto:info@eastsoffolk.gov.uk))

- 4.6 ESC also notes that following the outcomes of the OCSS, National Grid Electricity System Operator made a commitment to review the connections in East Anglia, this work is yet to be undertaken and therefore increases the amount of uncertainty.
- 4.7 Notwithstanding the above, ESC acknowledges that National Grid Electricity Transmission (NGET) has endeavoured to plan for a degree of co-location, whilst this is a step in the right direction, this has however not been reciprocated by the other projects. LionLink for example continues to promote a number of different landfall, cable route and converter station location options, the converter station site east of Saxmundham is just one of these options and no indication of a preferred site has been given. The degree of coordination 'buy in' from the various scheme promoters is very unclear. National Grid Ventures (NGV) has also not provided any further details of the siting and routing options for Nautilus since their non-statutory consultation and therefore the siting and routing options in relation to this project are unknown. It is noted that NGV are exploring a potential alternative connection for the Nautilus project at the Isle of Grain which ESC fully supports, however the feasibility of this has not been confirmed and the uncertainty surrounding the connection location for this project is very challenging.
- 4.8 The lack of coordination evident between Sea Link and other proposed NSIPs connecting in the same locality is a significant concern. Should the Sea Link project continue to be progressed, maximum coordination should be inherent within the design and ambitious solutions delivered as the revised NPSs state. Coordination is considered to be more than just co-location, it is essential that there is a reduction in the disruption and environmental impacts as a result.
- 4.9 As stated above, coordination should be sought during all phases of the developments, not just at the siting and routing stage, although the co-location and sharing of infrastructure/corridors at the siting and routing stage is important. The various NSIPs are currently being proposed on the basis of multiple different timescales. In order to deliver a genuinely coordinated approach, ESC considers that National Grid PLC should seek to align their projects (Sea Link and Lionlink with the addition of Nautilus only in the event it connects in east Suffolk) both spatially but also temporally in terms of consenting and delivery. The alignment of timescales would allow a shared or conjoined examination with the appointment of the same examining panel to consider the projects. This would not only help to reduce the huge burden on local communities and statutory consultees imposed by the consenting process, but it would also allow the robust consideration of the coordinated design and cumulative impacts of the projects.
- 4.10 In order to reduce the degree of disruption experienced by local communities and the adverse impacts on the environment, the delivery of Sea Link should be coordinated with other projects being delivered in the locality. As stated above, coordination should reduce the adverse impacts of the project, so in the event the projects all

receive consent, we avoid the situation where each project is being delivery one after the other, with the construction effects being elongated and experienced over many years.

5.0 Need

5.1 The project is said to be required in order to be able to transfer energy to and from Suffolk and to and from Kent. However, in respect of exporting energy from Suffolk and Suffolk grid reinforcement, the need for the project only arises once Sizewell C, LionLink and Nautilus are all operational (the latter two are not yet consented). Therefore, the reinforcement is not yet required, and should the identified projects not become operational at the times anticipated or not be delivered at all, then presumably this changes the need for Sea Link. If Sea Link is consented; its implementation should be conditional on the other three projects all being committed. With regard to the Kent perspective, Sea Link serves to reinforce the south coast grid but it is not considered that it has adequately been demonstrated that reinforcement by a means other than Sea Link is not possible.

6.0 Overview of ESC's Position on Sea Link

6.1 ESC currently objects to the Sea Link project as it would result in further unacceptable harm to the communities, environment and economy of East Suffolk and it is not yet considered that the timing of the need for the project is currently proven, and with Sizewell C potentially at least 10 years away from generation, it is requested further consideration of alternative offshore solutions is undertaken and consider that the project does not currently include sufficient levels of coordination in all areas of the NSIP process. In reaching this position the submitted plans showing the possible siting of converter stations adjacent to the proposed converter station for this project amplify the coordination/cumulative impact concerns.

7.0 Master Planning and Good Design

7.1 Notwithstanding the Council's position, should Sea Link alongside other NSIPs (LionLink and potentially Nautilus) be progressed within east Suffolk this should be on the basis of a coordinated approach. ESC remains significantly concerns about the cumulative impacts of multiple projects. In order to ensure the delivery of good design, it is imperative that the converter station site is appropriately master planned. Without the strategic oversight of a master plan, it will be impossible to understand whether the site can accommodate multiple projects and demonstrate the achievement of long-term good design. The masterplan should be developed collaboratively with not only the other affected NSIP promoters but also with statutory consultees, which includes the relevant town and parish councils.

- 7.2 The provision of an inclusive and collaborative master planning process is an important component of the delivery of good design. This collaborative process must however extend into the more detailed design phases and include genuine engagement with the local authorities, parish and town councils and local communities. It is important that the site is designed to minimise the adverse impacts through innovation and embedded mitigation and maximise any opportunities for benefits through the delivery of enhancements. Recent NSIPs consented within east Suffolk have also included an independent design review process which should be included as a commitment within any application.
- 7.3 Further commentary regarding the design of the project has been provided by the Design and Heritage Team within the technical comments section of the report. ESC would welcome engagement on the design approach to the converter and substations in addition to the overall master planning. It is noted that currently the design proposals appear to be limited to that of the converter station, similar consideration should be given to the design of the substation at Friston.

8.0 Landfall

- 8.1 The landfall identified is located at the seaside town of Aldeburgh, just across the road from the well-known sand and shingle beach. The site is within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and defined Heritage Coast, Leiston-Aldeburgh Site of Special Scientific Interest (SSSI), RSPB North Warren Reserve and close to the Sandlings Special Protection Area. The town is a hugely popular tourist and visitor destination with the area heavily used year-round as a walking route between Aldeburgh and Thorpeness. In addition to the high landscape importance of the area, Aldeburgh is also considered of great cultural significance. Further details in relation to ESC concerns regarding the impact on the tourist economy from this project in combination with other NSIP projects has been provided in the project wide section later in the report.
- 8.2 The Preliminary Environmental Information Report (PEIR) makes the assumption that the Leiston-Aldeburgh SSSI which is part of RSPB North Warren Reserve will be crossed using trenchless techniques and therefore direct impacts on the designated sites will be largely avoided. No evidence has however been provided to demonstrate that this technique is feasible in engineering terms and therefore deliverable. Without this certainty there is potential for greater impacts to occur. Greater information, evidence and justification must be provided to demonstrate the deliverability of the trenchless technique chosen and then this technique would need to be secured within the Development Consent Order (DCO).
- 8.3 Horizontal Directional Drilling (HDD) is one of the trenchless techniques which could be adopted, but the PEIR has not considered the potential risk of ‘frack out’ associated with this technique and the impacts this could have. ESC has experience of other NSIP

projects utilising HDD techniques and, on each occasion, ‘frack outs’ have occurred. The potential hydrological impact from the trenchless construction works on the designated sites has also not been assessed, it is therefore unclear what measures could be implemented to address potential impacts which could arise.

- 8.4 Access to the landfall area by large vehicles is limited. The site is served by narrow roads which either travel through Aldeburgh or Thorpeness, two popular seaside destinations. The difficulties of large vehicles using the roundabout at the entrance to Aldeburgh was explored as part of the East Anglia One North and East Anglia Two projects and therefore ESC recommends that NGET revisit this information and the challenges faced.
- 8.5 ESC could not find any landfall impact assessments, material or reference to any consideration of coastal change or impacts on/from existing planned coastal structures within the consultation documents. If NGET has scoped coastal change from this stage of the process this is a significant oversight which should be rectified moving forwards. The section of the coast proposed for the landfall is managed by the Environment Agency and so the applicant should ensure they are consulted on this matter. ESC has responsibility for managing coastal frontages to the north (Thorpeness) and south (Aldeburgh) of the proposed landfall and so would have an interest in the findings of the coastal change/management impact assessment.
- 8.6 The impacts on residential properties must also be taken fully into consideration. The western end of the landfall and cabling corridor are in close proximity to residential properties. Construction activities taking place at the landfall site, from previous experience, will necessitate some 24-hour working which could cause significant noise and disturbance to local residents.
- 8.7 Flood risk is also a significant concern. The low lying Hundred River valley has the potential for surface water and tidal inundation and lies within Flood Zone 3. Flood risk from all sources of flooding must be very carefully considered.
- 8.8 Finally, given the sensitivities of the landfall site significant further detail is required in relation to the impacts of the works at the landfall from both one project alone and cumulatively, in addition to the provision of required mitigation. ESC request that spatial and temporal coordination is fully explored as this could deliver a significant reduction in the adverse impacts socially, environmentally and economically.

9.0 Cable Corridor

- 9.1 The cable corridor associated with the Aldeburgh landfall is heavily constrained on the eastern end by ecological and landscape designations in addition to other matters as previously highlighted. If this can be navigated, there is then a significant pinch point at the crossing of Leiston Road close to Aldeburgh Golf Club. At this narrow point the

construction works would not only be near residential properties, but also have the potential to cause significant disruption to one of the main routes into the town from Leiston. Once across Aldeburgh Road the cabling would be to the north of the current golf club layout but through an area of land granted planning consent (DC/22/2697/FUL) to facilitate the expansion of the golf course and the creation of new holes. The corridor also remains within the designated AONB for the majority of its length.

- 9.2 The cable route continues to pass close to residential properties as it travels across to the converter station site, it is proposed the cabling will enter the Friston site from the north which involves running near residential properties and tourist businesses. The route would involve interaction with the East Anglia One North and East Anglia Two Order Limits and cable corridors which are entering the Friston site from the south. The construction works in combination with the offshore wind projects will need to be carefully considered to avoid compromising the mitigation measures already secured under the consented DCOs.
- 9.3 From the converter site there is a need for a High Voltage Alternating Current (HVAC) cable corridor back to the proposed Friston substation. This would result in a cable corridor entering the Friston site from the western side. The proposals in addition to the construction works associated with the East Anglia One North and East Anglia Two projects, should they be constructed, would encircle the village with construction works.
- 9.4 ESC requests that NGET seek to minimise disruption to both residential properties and businesses through micro siting of the route and also by providing appropriate mitigation for the works proposed. Should multiple projects be required to cable through this area, coordination both spatially and temporally will be essential.
- 9.5 There has been no consideration of narrowing of the cable route swathes in particular sensitive locations to reduce the impact of the cable construction works. This embedded mitigation technique was utilised on the East Anglia One North and East Anglia Two projects and ESC considers that such an approach should be fully considered as part of this project. In addition to this further justification is required as to why the cable corridors within the swathes cannot be reduced in width and need to be the widths specified.

10.0 Converter Station

- 10.1 Saxmundham is an historic market town set in the valley of the River Fromas, a tributary of the River Alde. The converter site lies to the east of the town and is detached from the setting of the AONB. The site is bounded to the north by the Leiston-Saxmundham Road (B1119) and to the south by a woodland block and occupies an elevated position in the landscape. The land to the north and east of

Bloomfield's covert is open arable land. Modern commercial farming practice since the mid-20th Century has stripped the landscape of most key features such as field boundary hedgerows, hedgerow trees and small woodland blocks, Prior to agricultural improvement works after 1945, this area had a locally characteristic field pattern and included a substantial Ancient Woodland known as Great Wood, as well as ponds and a small plantation typical of the Ancient Estate Claylands landscape type, of which this area is part. The visual impact of the development is hard to mitigate during construction or in the early years after construction, due to the open nature of the landscape.

- 10.2 Access to the site is constrained due to the road network serving the area and the desire not to route traffic through either Saxmundham or Leiston. Multiple access routes to the converter station have been identified within the consultation. The benefits and disbenefits of each option will need to be carefully considered. For example, the access proposed to the southeast at Red House Farm would seem to cause the least landscape impact, although it would include the loss of hedgerows and landscape character, this would however involve the inappropriate utilisation of narrow rural roads for potentially large vehicles. The northern access of the B1121 would allow the centre of Saxmundham to be bypassed, however it would also result in direct impact on Carlton Park which is a locally listed historic parkland, affect trees subject of Tree Preservation Orders, roadside hedgerows and the setting of Saxmundham Conservation Area. The southern access of B1121 would similarly allow Saxmundham centre to be avoid but as a consequence have direct impacts on the Fromus valley landscape, willow woodland belt and roadside hedgerows. ESC would welcome further engagement on the access options to fully understand the proposals and level of permanence associated with each one.
- 10.3 It is important that surface water drainage and flood risk at the site is appropriately assessed and managed given the contours and potential poor infiltration properties at the site. The Order Limits must be sized appropriately to accommodate the drainage solution for the site during both construction and operation.
- 10.4 The site is crossed by Footpaths 5 and 6 which would require diversion, it is essential that any new route provides appropriate amenity for the users. This will feed into the master planning of the site as it is important that any permanent diversion is established with the long-term future of the site fully considered, to avoid the need for subsequent diversions.
- 10.5 As the surrounding landscape is largely undeveloped and open, this needs to be considered alongside the setting of Wood Farmhouse and Hill Farmhouse, Grade II listed buildings. The combination of agricultural land alongside the patches of woodland strongly contribute to the setting of the listed buildings and other surrounding heritage assets. The consideration of setting has been incorrectly based solely on intervisibility and we refer the applicant to Historic England's 'The Setting of

Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)' (2017) which states that setting may also be understood through 'our understanding of the historic relationship between places.

- 10.6 A list of assets which ESC considers should be included within the assessment has been provided within the detailed technical comments. For example, no justification has been given for scoping out the churches of St John the Baptists (Saxmundham) or Mary Magdalene (Friston). The Church of John the Baptist (Grade II*) stands on the eastern edge of the Saxmundham Conservation Area, on lower ground. While the church is some distance from the site, as medieval structures, churches have a complex relationship with the surrounding landscape, as historic religious centres, and therefore their setting is likely extensive. Further information is required if they are to be screened out.
- 10.7 ESC would like to have further discussions with the applicant in relation to the conclusions reached on the significance of the impact on heritage assets to ensure that the harm is not being underplayed.
- 10.8 In relation to operational noise, the starting point for ESC is to seek a below background sound rating level. The acoustic character of the area is quiet and rural, and the Sea Link project will introduce a potential persistent industrial noise into this area. Projects of this scale have the responsibility and means to ensure they achieve the best possible outcome, and this begins within a thorough assessment considering all aspects of an introduced sound or noise and not simply rely on calculated levels where there is an inherent uncertainty. A robust subjective assessment which considers the character of the area and character of that noise must be undertaken. Noise creep is a concern for ESC particularly in the co-location scenario.
- 10.9 It is noted that the assessment has indicated that with mitigation the sound levels at nearby noise sensitive receptors will be below background, this is welcomed and aligns with ESC asks. It is important that we work collaboratively to ensure that this is the best level which can be achieved, and no further reasonable improvements can be made.
- 10.10 ESC does not currently agree with the scoping out of noise effects from new overhead lines, it is considered further assessment is necessary to justify the assumption of unlikely significant adverse effects.
- 10.11 In addition to the project wide ecology comments provided below, there is concern that the PEIR does not properly consider the operational impacts from noise on birds and other fauna. The current assessment limits its consideration of impacts to maintenance visits and does not consider the operational noise of the converter station. This should be addressed within the future Environmental Statement (ES).

- 10.12 The PEIR is not clear in relation to the role of mitigation planting in moderating the magnitude of effects overtime. In the future ES this needs to be made much clearer and should include a realistic understanding of growth rates for new planting in east Suffolk. The erratic and unpredictable rainfall patterns, notwithstanding the late summer and early Autumn of this year, can be a very limiting factor in successfully establishing new tree and shrub growth. This should be identified in consultation with ESC and once established, further photomontages should be provided to illustrate year 1, year 5 and year 15 post planting. It is essential that a master plan for the site is created to ensure that mitigation planting relied upon for one project is not compromised by subsequent projects.
- 10.13 Further information is required in relation to the cumulative parameters of the collective development and the extent of the infrastructure sharing which would be possible. Good design must be an essential component of the project. The importance of design has also been reflected within the revised NPS EN--1 which encourages the seeking of professional advice on design aspects of the scheme. Design input should be sought at an early stage and continue throughout the consenting and post consent phases. Good design can help to lessen the visual impacts of the development which is vital given the scale of infrastructure proposed for the Sea Link project alone, and in a coordinated scenario.

11.0 Connection Substation at Friston

- 11.1 The proposed National Grid substation location is a sensitive site, with its historic character, proximity of listed buildings, proximity to residential properties and the settlement of Friston, flood risk, public rights of way and quiet rural positioning. Significant amounts of information were submitted as part of the East Anglia One North and East Anglia Two DCO examinations which should be carefully reviewed and taken into consideration.
- 11.2 The impact of the National Grid substation on the surrounding heritage assets at Friston has been discussed at length by ESC and other stakeholders during the East Anglia One North and East Anglia Two examinations. At the scale that the substation has already been considered, there will be adverse impacts of various magnitudes on Little Moor Farm (Grade II), High House Farm (Grade II), Woodside Farm (Grade II), Friston House (Grade II), Church of St Mary (Grade II*) and the War Memorial (Grade II), and it will cause the loss of a historic track which is considered a non-designated heritage asset. Should the National Grid substation at Friston need to be extended, this would likely worsen the impacts on these heritage assets. Some of the assets have however been scoped out of the assessment which ESC disagrees with.
- 11.3 As previously stated in relation to the converter station site, no justification has been provided for scoping out the church of Mary Magdalene. A full list of the assets which

should be assessed has been included within the technical comments provided later within this report.

- 11.3 In addition to the above assets, Friston Hall is a Grade II listed building located within the village, development within the curtilage is likely to impact its setting and significance, this is not currently acknowledged within the consultation material. More information is required on the loss of a formal landscape historically to better understand impact on the setting of the listed building.
- 11.4 It is noted that the PEIR chapter on existing flood risk and drainage fails to acknowledge historical surface water flooding which has been experienced downstream in Friston. The village has been subject of surface water flooding on multiple occasions. Suffolk County Council as the Lead Local Flood Authority has undertaken s19 investigations under the Flood and Water Management Act 2010 which should be taken into account within the documents. This omission should be addressed within the ES.
- 11.5 It is vitally important that there is sufficient space on site to accommodate an acceptable construction drainage design in addition to understanding the implications of the operational drainage design and its interaction with the drainage proposals consented under the East Anglia One North and East Anglia Two projects.
- 11.6 In relational to operational noise, ESC does not agree with the scoping out of the substation at Friston on the basis that the switchgear noise emissions would be impulsive in character and operation would be infrequent. Insufficient justification has been provided to support this decision. This substation is subject of a site rating level imposed by East Anglia One North and East Anglia Two DCOs, therefore NGET needs to be very confident that the introduction of a further or different equipment will not impact that constraint.
- 11.7 As identified above, it is important that the impact of the operational noise of the substation is considered in relation to birds and other fauna.
- 11.8 The proposals in relation to the overhead works differ considerably from that proposed under the east Anglia One North and East Anglia Two projects. It is important that NGET and Scottish Power Renewables work together to communicate any changes and reasons for these, so it is understood whether these have been identified collaboratively. Further detail is required in relation to the interactions of the projects in this regard.
- 11.9 The local community has been subjected to a number of years of uncertainty as a result of the East Anglia One North and East Anglia Two DCOs, the current consultation proposes to increase the amount of infrastructure in the area. NGET should be aware of the detrimental impact this will be having on the affected local community. It is essential that NGET appropriately engages with the local communities and parish and

town councils. The issue of the impact on wellbeing will be felt across this area of the district but will be intensified in communities which have been subject of previous NSIPs proposals.

12.0 Project Wide Comments

12.1 Ecology

12.1.1 A significant amount of ecological survey work remains outstanding, in addition to some survey work which has been undertaken not being provided for review, the combination of this has limited the ability for ESC to provide detailed comments on the ecological impacts and also the avoidance, mitigation and compensation measures which would be suitable to address these.

12.1.2 The use of terms such as 'where feasible and necessary' within the consultation documents is unhelpful and provides a significant degree of uncertainty in relation to the deliverability of the commitments made. If an assumption is made within the PEIR or future ES and that assumption is utilised for the basis of the assessments, then this must be secured within the DCO and form a firm commitment. Alternatively, the assessment should be based on the worst-case scenario.

12.1.3 In previous examinations there has been significant discussion in relation to growth rates and the agreed period of time planting would take to grow or be restored. It is important that growth rates are agreed with ESC prior to the ES assessments being undertaken on the basis of assumptions made. It is noted that in the PEIR for example, it is stated that the hedgerows will be restored within 1-2 years, there is no justification of this statement and in the Council's experience this is not likely to be achievable.

12.1.4 The provision of 10% Biodiversity Net Gain (BNG) is welcomed, ESC would however want to raise at this early stage that it is expected that 10% BNG will be delivered in both geographical locations independently (i.e. Suffolk and Kent).

12.2 Construction Noise

12.2.1 The use of BS5228 – Code of practice for noise and vibration control on construction and open sites along with the ABC methodology within that code, is accepted. The working hours however set out in the Outline Code of Construction Practice (OCocP) identify Saturday working at 07:00-17:00. ESC does not currently consider that Saturday afternoon working is acceptable. Saturday working hours of 07:00-13:00 were set as part of the East Anglia One North and East Anglia Two projects and should be complied with on the Sea Link project.

12.2.2 ESC has concerns about the magnitude of impact which has been determined by the Design Manual for Roads and Bridges (DMRB). There is a concern that the levels set

provide a false representative of the scale of magnitude and downplay the actual magnitude of impact, a medium impact being the highest theoretically achievable level of impact. Further details are provided in the technical comments later in the report, but ESC would welcome further discussions on the magnitude of impact methodology. ESC has similar concerns in relation to the use of DMRB and the inclusion of above SOAEL magnitude levels in the magnitude impact thresholds, SOAEL being a level to be avoided.

12.2.3 ESC notes that Best Practicable Means (BPM) will be implemented which is welcomed, this should be committed to at all times with work and any noise mitigation carried out to BPM to ensure noise and vibration are kept to a reasonable minimum and not just below the relevant thresholds. BPM is a critical control point for a project of this scale.

12.3 Private Water Supplies

12.3.1 The district has a number of private water supplies that could be sensitive to construction works and therefore ESC would invite NGET to engage with us to ensure that these supplies are protected.

12.4 Air Quality

12.4.1 ESC notes that a detailed air quality assessment will be carried out at the ES stage once further data is available. It is understood that at this stage Non Road Mobile Machinery (NRMM) will be considered further, however the Council would like to see a commitment to reduce emissions from this source which should include commitments to use renewable energy sources alongside Stage 4 NRMM as a minimum and Stage 5 where possible.

12.5 Land Contamination

12.5.1 In terms of land contamination, whilst ESC accepts the risk of contamination may be low, this does not preclude the possibility of unknown contamination and therefore a management plan which provides a robust strategy and procedures for managing contamination should be provided and agreed with ESC.

12.6 Landscape

12.6.1 In addition to the comments previously provided within the response, ESC has concerns regarding some of the value assessments given to selected viewpoints, further justification is required in relation to these judgements, and this discussed further with the Council.

12.6.2 ESC would also expect tree and hedgerow surveys to be carried out to identify the most important landscape features and details provided of how to protect them.

12.7 Socio-economic

- 12.7.1 The visitor economy is one of the largest sectors in east Suffolk accounting for 15% for all employment in the district. The continued success of this sector of the economy is dependent on the areas reputation as a holiday destination and the overall experience offered to visitors. ESC is concerned that the impact of Sea Link in combination with other significant infrastructure projects proposed and consented in the locality will negatively affect the visitor experience, damaging the reputation and perception of the district as a holiday designation, ultimately adversely affecting the visitor economy. It is essential that this impact is appropriately considered and assessed, and appropriate mitigation provided to support the success of the sector.
- 12.7.2 The potential benefits of the direct and indirect temporary employment are welcomed but it is essential that these opportunities are accessible to the resident population of east Suffolk.

12.8 Cumulative Impacts

- 12.8.1 The PEIR considers the list of projects to be taken forward as part of the cumulative impacts assessment. It is noted that only projects and impacts considered to crossover with the anticipated peak construction period (2029) of the Sea Link project have been included for final assessment. Cumulative impacts with other projects, particularly NSIPs should not be scoped out on the basis of uncertain construction programme forecasts. For several reasons including legal and funding challenges a number of the consented NSIPs including East Anglia One North, East Anglia Two and Sizewell C, have not been able to follow the construction timescales they predicted during their examinations. It is therefore essential that NGET do not arbitrarily scope out projects which are known to be delayed based on their originally predicted timeframes. Similarly, it is important that Sea Link consider the implications of delays to their own project. ESC is significantly concerned about the cumulative impacts of the Sea Link project alongside other significant infrastructure projects; it is essential that the assessment undertaken is robust to ensure the full extent of the impacts are understood and appropriate mitigation measures are provided. This includes the consideration of cumulative impacts outside the identified peak construction year.

12.9 Community Compensation

- 12.9.1 If the scheme is consented by the Secretary of State, there needs to be adequate compensation for the communities that will be adversely affected. The Council would welcome early engagement with the applicant on this matter.

12.9.2 It is important that community benefits remain distinctly separate from the need to adhere to the mitigation hierarchy, firstly to avoid, then to mitigate and only if mitigation is not adequate to compensate. As part of this process, it is important that consideration of long term enhancement and legacy opportunities are maximised.

13.0 Detailed Comments from Technical Officers

13.1 Design and Conservation Comments

13.1.1 Converter Station Design

1.1.5: It is unclear how the completed converter station will appear, as it is noted that it could be 'up to 26 metres high, plus roof mounted equipment, which may include lightning protection, aerials and walkways. These factors are important in considering visual impact. Likewise, regarding the perimeter fencing to enclose and area of approximately 6.5 hectares.

1.1.6: Positive consideration of design is welcome; however, this would need to take account of the surrounding landscape and the setting of heritage assets in the vicinity.

2.1.4: As the surrounding landscape is largely undeveloped ('unspoilt') this needs to be taken into account, as well as the setting of Wood Farmhouse and Hill Farmhouse, Grade II Listed Buildings. It needs to be stressed that the combination of agricultural land as well as the patches of woodland which define the area strongly contribute to the setting of the above listed buildings, as well as other surrounding heritage assets, in terms of both their character as well as understanding their context and historical development. It is suggested that colour be considered in light of the surrounding landscape.

2.2: It is not considered that the enhanced elevations approach would be appropriate. While acknowledging the deliberate choice of colours in regard to the surrounding landscape, the structure will likely still remain conspicuous and visually impactful. This approach may also result in harm to the setting of surrounding heritage assets. It would be useful to have existing examples displayed to better understand the potential visual impact.

2.2.3: It is noted that the converter station will likely be visible from the B1119, increasing its visual impact.

2.3: It is unclear how the use of coloured horizontal banding can be applied successfully. While the illustration provided shows a relatively seamless integration with both land and sky, in reality that would depend on being in a specific location and looking at a specific angle. The change of seasons, as acknowledged in 2.2.2, would invalidate the colour scheme chosen for at least part of the year, making the structure

more visually intrusive. It would be useful to have existing examples demonstrated to better understand the potential visual impact. It is not considered that the use of coloured banding would therefore be appropriate, as it may result in harm to the setting of surrounding heritage assets.

2.4: The green roof approach may offer the best approach in terms of mitigating visual impact and minimising harm to the setting of the surrounding heritage assets. It appears to allow the structure to be incorporated into the landscape unobtrusively. It would be useful though to have existing examples displayed to better understand the potential visual impact.

2.5: While acknowledging that the agricultural barn approach seeks to evoke the district's existing rural architecture, it is considered that the scale of the structure will greatly exceed the size of most local farm buildings. It is noted that while the gabled roofs also appear to have been chosen to reflect local agricultural architecture, their repetition as illustrated would likely be overly conspicuous, increasing the building's visual impact. It would be useful though to have existing examples displayed to better understand the potential visual impact. It is considered that the agricultural barn approach would be appropriate, as it may result in harm to the setting of surrounding heritage assets.

2.6: The colour and curve approach may be acceptable, though it would likely need to be carefully designed to be successful. However, there is still the potential that this design may result in harm to the setting of surrounding heritage assets. It would be useful though to have existing examples displayed to better understand the potential visual impact.

2.7: The kinetic approach is unlikely to be appropriate due to its conspicuousness and distinctive alienness in the surrounding landscape. This is noted in 2.7.3, which acknowledges that this design choice would likely be better suited to the Kent site.

13.1.2 Preliminary Environmental Information Report

5.3.5: Setting erroneously only considered in terms of intervisibility, whereas it also includes the historic relationship between heritage assets and the wider landscape.

PEIR: Vol. 1, Part 2, Chapter 4 (Cultural Heritage)

2.4.1.4 - 2.4.1.5: These should be included as appendices in the document.

2.4.4.5: Limited understanding of setting has been incorrectly based solely on intervisibility. Historic England's 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)' (2017) states that setting may also be understood through 'our understanding of the historic relationship

between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each’.

2.4.6.2: Figure 1.1.2 not included in document.

2.4.6.3: Figure 2.4.2 not included in document.

2.4.7.3: Is a full list of listed buildings available?

2.4.8.3 – H02: East Suffolk Council should always be informed of any discovery.

MSF23092: Friston Hall a Grade II Listed Building, therefore development in its curtilage is likely to impact its setting and significance (not acknowledged in the preliminary assessment). More information required on the loss of a formal landscape historically to better understand impact on the setting of the listed building.

MSF43589: No comment (archaeology)

2.4.9.14: No justification has been given for the scoping out of the churches of St John the Baptist or Mary Magdalene. As medieval structures, these churches have a complex relationship with the surrounding landscape, as historic religious centres, and therefore their setting is likely extensive. Further information is required if they are to be screened out.

2.4.9.14: Blank third bullet point.

2.4.9.14: Disagree that Sternfield House, Little Moor Farmhouse, High House Farmhouse and Hill Farmhouse merit scoping out.

2.4.9.14: Agree with conclusion regarding Friston Post Mill.

LB1231179: Disagree that existing outbuildings will provide screening, as there are extensive views east from the east elevation of the farmhouse.

Likewise, regarding vegetation, for though there are trees surrounding the house, these are largely directly south and will provide limited screening looking south-east. Unclear what statement ‘farmhouse was not designed to have long ranging views over the surrounding landscape’ means. The wider agriculture landscape contributes to the setting of the farmhouse by reinforcing an understanding and appreciation of its historic function, which continues to the present. Similarly, while not designed as a landmark, the farmhouse nonetheless provides a prominent visual marker in the landscape.

Agree with the statement 'it is, however, acknowledged that the agricultural fields that surround the farm represent a component of the farms setting, and the loss of some of these fields will erode the agricultural setting of Wood Farm'.

Likely significance of effect given as 'not significant'; however, this does not appear to comply with table 2.4.7.

LB1268178: Whilst the description of significance is largely agreed with, it should be noted that Wood Farm historically formed part of the Hurts Hall estate, and therefore is considered to form part of its setting.

Whilst the conclusion on impacts are largely agreed with, it should be noted that Wood Farm is considered to form part of the setting of Hurts Hall and hence should also be taken into consideration. Similarly, views from the former track leading to Wood Farm should be taken into consideration.

Likely significance of effect given as 'not significant'; however, this does not appear to comply with table 2.4.7.

LB1215749: The description of significance is largely agreed with. However, we would disagree with the assertion that 'it does not appear to have been designed to be a prominent feature in the wider landscape'. Buxlow Manor appears to have been designed as a high-status dwelling, apparently dating from 1678 according to the listing description. Built to an E-shape plan with three prominent Dutch gables, the building is clearly intended to advertise its status, and as such may be considered a prominent feature, regardless of current vegetation and screening. It is unclear how well screened the house would be from the proposed converter station, though it is acknowledged that the existing hedgerows would provide some mitigation. However, it does appear that there are clear views across the valley looking west and south-west. It is possible that the proposed converter station could be even more visible from the first and second stories of Buxlow Manor. I also disagree with the statement:

"the house does not appear to have been designed to be a prominent feature in the wider landscape and was rather built to occupy a key location on the north side of the green of the settlement of Knodishall Green".

for the reasons given above.

The significance of effect given is 'not significant', however this does not appear to comply with table 2.4.7.

LB1287864: The description of significance is largely agreed with but note that no consideration has been given to the church's wider setting. As a medieval religious

structure, Friston Church likely has a complex relationship with the surrounding landscape, being a local religious centre.

It is agreed that views of the convertor station from the church would likely be limited due to existing vegetation and screening. However, it is less certain if the proposed structure would affect the church's visual dominance in the landscape, especially from further views.

Likely significance of effect given as 'not significant'; however, this does not appear to comply with table 2.4.7.

The following heritage assets be considered in regard to both the Saxmundham and Friston sites:

- Saxmundham Conservation Area
- Church of St John the Baptist, Saxmundham (Grade II* LB)
- Oak Tree Farmhouse (Grade II LB)
- Hill Farmhouse (Grade II LB)
- The Limes (Grade II LB)
- Garden Cottage (Grade II LB)
- Church of St Mary Magdalene, Sternfield (Grade II*)
- Sternfield War Memorial (Grade II LB)
- Sternfield House (Grade II LB)
- High House Farm (Grade II LB)
- Little Moor Farm (Grade II LB)
- Woodside Farm (Grade II LB)
- Friston House (Grade II LB)
- Friston War Memorial (Grade II LB)
- Nos. 1 and 2 (Church Walls) and 3 and 4 (Church Walls Cottage) (Grade II LB)
- Track previously identified as an Non Designated Heritage Asset

13.2 Ecology Comments

It is noted that there is a significant amount of ecological survey work that remains to be undertaken and therefore it is not possible to provide detailed comment on all potential impacts at this time.

13.2.1 Statutory Designated Sites

The PEIR identifies that the landfall location for the cable limit of Deviation (LoD) crosses part of the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI) and RSPB North Warren Reserve. The assessment assumes that this site will be crossed using a trenchless technique (e.g., at section 2.3.5.55 and Table 2.3.14) and therefore direct

impacts on the designated site will be largely avoided, resulting in a Negligible Adverse, Not Significant effect on the SSSI. However, it is unclear whether the assumption that this type of construction method is deliverable in this location is justified. In the absence of adequate demonstration that trenchless installation is achievable, the selection of this landfall area means that the project has the potential to result in a much greater impact on the designated site than is set out in the PEIR. The use of a trenchless technique (such as horizontal directional drilling) comes with its own potential construction impacts, such as the risk of ‘frack out’ of the drilling compound/material (e.g., bentonite), the risk of such impacts occurring and assessment of the impacts which they may have on the designated sites and the species which it supports must be assessed and addressed as part of the proposal. Justification of the selected landfall location and adequate demonstration that the proposal can be delivered without result in adverse impacts on the designated site are essential.

It is also noted that assessment of the potential hydrological impacts from trenchless construction on the designated site remain unassessed at this time, although Table 3.2.22 states that the project will “Implement measures to ensure no significant hydrological impact on water levels in North Warren RSPB Reserve”. In the absence of such assessment, it is unclear what measures could be implemented to address this potential impact. This must be adequately assessed and addressed as part of the project.

13.2.2 Non-Statutory Designated Sites:

The selection of the route to avoid County Wildlife Sites (CWSs) is welcomed.

13.2.3 Protected Species – Bats:

As recognised in section 2.3.5.32 and Table 2.3.7, new bat survey guidelines¹ have recently been released. It must be ensured that bat surveys programmed for 2024 are undertaken in accordance with these guidelines, and that where necessary surveys undertaken in 2023 that significantly deviate from the new guidelines are either updated or their validity justified as part of the Environmental Statement.

Section 2.3.5.34 makes reference to bat activity transect surveys which have been, and which are being, undertaken. However, it is not clear which transect routes have been selected. Further information on this is required so that it can be ensured that all necessary areas have been adequately covered by these surveys.

Section 2.3.5.39 identifies that bat activity static detector surveys are yet to be undertaken but are programmed for 2024. It must be ensured that such surveys have sufficient seasonal coverage to meet the best practice guidelines and appropriate inform the assessment within the Environmental Statement.

Table 2.3.8 sets out the ecological significance categories proposed to be used as part of the Environmental Statement. The applicant's attention is drawn to the guidance on this matter for assessing impacts on bats which is set out in the newly published Bat Mitigation Guidelines 2. It is requested that the Environmental Statement takes account of this guidance in relation to assessing potential impacts on bats.

13.2.4 Protected Species - Hazel Dormouse:

In addition to the use of nest boxes/nest tubes to survey for hazel dormouse (sections 2.3.5.40 and 41), it is strongly recommended that footprint tunnels are used in conjunction with the nest boxes/tubes. Whilst it is acknowledged that this method alone is not currently accepted as demonstration of absence of this species from a site, it is known to increase the likelihood of detection of dormice if they are present. It is therefore considered to be a good companion technique, alongside nest boxes/nest tubes, for establishing presence of this species.

13.2.5 Breeding and Wintering Birds:

It is noted from sections 2.3.5.22 and 2.3.5.25 that the wintering and breeding bird surveys undertaken to date have predominantly been carried out from public rights of way. Whilst the report states that this "enabled good coverage", no plans of this coverage are provided and therefore it is impossible to confirm whether this statement is correct. Given the high value of many habitats in the potential cable corridor for wintering and/or breeding birds, and the need to collect at least two seasons of survey data (as per section 2.3.5.55), it is essential that it is ensured that sufficient survey coverage has been achieved, otherwise there will be insufficient information available to allow full assessment of the likely impacts of the proposals on wintering and breeding birds. Many of these bird species are also features of the statutory designated sites in the area, and although the project seeks to avoid any direct impacts on such sites, given the potential for disturbance impacts as a result of construction it is also essential that adequate survey information is available to assess such impacts.

13.2.6 Assessment of Potential Ecological Impacts:

As set out in the PEIR and above, there is a considerable amount of ecological survey information which is still to be gathered, as well as a considerable amount which has been gathered but not made available to consideration. It is therefore not possible to provide detailed comments on all of the likely ecological impacts, or avoidance, mitigation or compensation measures which may be suitable to address these. However, based on the information provided in the PEIR I have the following initial comments.

13.2.7 General approach to avoidance and mitigation measures:

Whilst it is acknowledged that the project seeks to embed a number of ecological avoidance and mitigation measures within it, it is concerning that many of these, such as the use of trenchless construction techniques or deployment of physical noise mitigation measures, are caveated with the phrase “where feasible and necessary”. It is unclear how this test will be determined or what will happen if it is decided that a particular measure is necessary but not feasible? Many of these potential measures are related to avoiding or mitigating impacts on areas of high biodiversity importance, including nationally and internationally important nature conservation sites, and if such measures are deemed to be unfeasible then significant adverse impacts are likely to occur. If adequate measures following the mitigation hierarchy (avoid, mitigate, compensate) cannot be identified and implemented then unacceptably harmful ecological impacts will occur.

In addition to the embedded measures described in the report, it is noted that no reference to the use of narrowed cable construction working widths near particularly sensitive habitats is included. This is a measure which has been secured as part of other similar projects in the district, and it should form part of this proposal unless it is adequately justified why it is not necessary.

Finally, Table 2.3.13 (Preliminary assessment of direct loss of habitats during construction or decommissioning) should identify that the first step is to seek to avoid direct habitat loss, particularly permanent loss at the converter station and substation sites, through the design of the infrastructure. Only if it is appropriately justified that full avoidance is not possible should mitigation measures be pursued.

13.2.8 Assessment of specific ecological impacts, Leiston-Aldeburgh SSSI:

Table 2.3.17 (Preliminary assessment of disturbance of designated sites during construction or decommissioning) states that “Leiston-Aldeburgh SSSI is in the same location as Sandlings SPA and will therefore be similarly affected”. However, not only does the SSSI boundary not overlap with the SPA boundary at the landfall location, the SSSI also has a significantly larger suite of features for which it is designated. The assessment must take account of this, it cannot be assumed that measures potentially suitable for avoiding or mitigating impacts on SPA qualifying features are also suitable for SSSI features.

13.2.9 Assessment of specific ecological impacts, Hedgerow loss:

The assessment presented in the PEIR (e.g., Table 2.3.16) suggests that the applicant considers that hedgerow loss can be restored in 1-2 years. No justification for this timescale is provided, nor is it clarified what is meant by restored. It is considered highly unlikely that new hedgerow planting to either infill created gaps or replace

lost hedgerow lengths will be sufficiently mature in 1-2 years to mitigate for that which is lost. Whilst the Environmental Statement (ES) may consider such an impact to be temporary, it is essential that it clearly defines over what length of time such a temporary impact is likely to occur. This is to ensure that the assessment within the ES realistically considers such impacts and the time that it will take for mitigation measures to take functional effect.

13.2.10 Assessment of specific ecological impacts - Operational Noise:

Table 2.3.24 (Preliminary assessment of disturbance of birds and other fauna during Operation) concludes that disturbance of birds and other fauna during operation of the project would be at worst Minor Adverse, Not Significant in the absence of any mitigation measures. However, the justification provided only relates to maintenance visits during operation and does not address whether the operation of the equipment at the converter station and substation sites may give rise to disturbance impacts such as through the generation of increased noise (including high frequency noise). This should be assessed as part of the ES to determine whether any significant impacts from such sources may arise and whether any avoidance or mitigation measures are required to address these.

13.2.11 Assessment of specific ecological impacts - Shading of riparian habitats:

Table 2.3.36 (Preliminary assessment of shading impacts on riparian habitats during Operation) concludes that with mitigation the impact from shading on the River Fromus from a new crossing would be Minor Adverse to Negligible, Not Significant. However, the mitigation identified (bridge designed to a height:width ration of 0.7) is stated as being “where practicable”. As with measures described as “where feasible and necessary” discussed in section 3.1 above, it is queried what will be concluded if the necessary mitigation is determined not to be practicable. The conclusions presented in the ES should only be based on deliverable mitigation measures. If it is unknown whether a particular mitigation measure is deliverable, then the assessment must be made on a worst-case basis (i.e., that the mitigation measure is not deliverable).

Please also note in Table 2.3.36 that the receptor is the River Fromus not the River Frome.

13.2.12 Co-location Options:

Whilst in principle the exploration to co-locate infrastructure for other projects as part of this project is supported, this is only if it can be demonstrated that to do so would significantly reduce the cumulative ecological impacts from all of the relevant projects. This must include not only physical interactions, but also temporal ones. Co-location should not result in the lengthening of impacts (particularly disturbance

type impacts) as a result of requiring significantly increased construction timeframes or requiring project sequencing which significantly extends or overlaps construction periods.

It is also noted that co-location could result in this project installing cable ducts for use by projects. Whilst again in principle this may have merit, experience from other projects in the district where a similar approach has been taken has identified that risks such as duct failure ahead of following projects commencing must be considered as part of the overall assessment of the option.

13.2.13 Biodiversity Net Gain

Whilst the commitment to deliver Biodiversity Net Gain as part of this project is welcomed, as the project has two distinct geographic locations (Suffolk and Kent) it must be ensured that a minimum of 10% BNG is delivered in both areas. Delivery of greater BNG should not be proposed in one location at the expense of the other.

13.3 Noise and Vibration Comments

The Applicant has provided a variety of assessments and information which will continue to be scrutinised and assessed and will form the basis of ongoing discussions throughout this process. This response should be read in conjunction with ESC's scoping consultation response much of which is still relevant in terms of our expectations and That response below for completeness.

13.3 Operational Noise and Vibration

13.3.1 Opening Matters

In terms of Operational Noise and Vibration it is important to note our fundamental requirements which have been communicated to the applicant both verbally and in writing and appear in their assessment documents. Our current stance on noise from developments of this nature in this district may be summed up by the following condition used in Town and Country Planning Act applications but is equally relevant here and has been stated for this and other DCO projects we are involved with:

Noise from fixed plant or machinery (e.g., heat pumps, compressors, extractor systems, fans, pumps, air conditioning plant or refrigeration plant) can be annoying and disruptive. This is particularly the case when noise is impulsive or has tonal characteristics. A noise assessment should therefore be submitted to include all plant and machinery and be based on BS4142:2014. A rating level (LAeq) of at least 5dB below the typical background (LA90) should be achieved. Where the rating level cannot be achieved, the noise mitigation measures

considered should be explained and the achievable noise level should be identified and justified.

Due to the size of these types of projects the 5dB below background is an aspirational target and one ESC ask developers to consider as the appropriate limit, deviation from this level will require robust justification and the aim in all cases should be to achieve the lowest possible sound level which will also require robust justification, this should be in line with all relevant standards, guidance and policy. The developer is reminded of the overarching principles of NPS EN-1 in terms of noise and vibration and particularly the requirement to mitigate and minimise adverse noise impact and avoid significant adverse impact.

The Applicant has previously stated that it is their intention that the development, if consented, will have a rating level below background sound levels which broadly accords with our expectations in this regard subject to those levels being agreed. The council recognises that an initial assessment has been undertaken and a relatively conservative approach adopted in the determination of representative background sound levels has been taken, further assessment of the relevant documents is required before agreement can be made but the representative backgrounds currently suggested appear to be reasonable and the applicants adoption of the night time levels as those of most significance in terms of impact is accepted as the correct determinant to base future targets on in respect to suitable rating levels.

Due to the low background sound levels in this area, particularly at night, it is extremely important that noise levels from the development are avoided, mitigated or minimised to ensure these background sound levels are not subject to “noise creep”. This is particularly important given this sites potential as a co-location site for at least one other similar project making the reduction of individual project impact key to the prevention of cumulative impact. It is not enough to say that future impact is the responsibility of future projects, and it must be taken account of now, the adoption of below background rating levels will effectively aid the prevent of cumulative noise impact by preventing the increase in background sound level that future projects would adopt for their assessment.

As stated above due to the likelihood that there will be future projects using this site background noise creep is a significant issue. The applicant mentions absolute levels in their documents and assessment, and this is assumed to mean that a site noise level of 35db may be considered. If this is the case, it will be resisted in the strongest terms in favour of a below background rating level. Whilst it is accepted that BS4142 allows for consideration of absolute levels in certain circumstances the cumulative potential for this site and the current character of the area means that all efforts should be made to prevent background sound level creep which the adoption of a 35dB site level would not. An absolute level would also not take account of any acoustic penalties that a rating would, given the types of plant to be used tonality, impulsivity and

intermittency are all likely to be considerations. If this is to be considered in line with section 11 1) of BS4142 we will require a robust assessment to show that adoption of absolute levels is as or more protective than rating levels and would require consideration of acoustic character of those levels in line with section 11 2).

The Acoustic character of the area is quiet rural residential in nature and this application and development has the potential to introduce a persistent commercial and industrial noise into that character, this should hold considerable weight in terms of contextual the considerations required by BS4142 when assessing the significance of impact in addition to assessed and modelled noise levels. Projects of this scale have the responsibility and means to ensure that they achieve the best possible outcome, and this begins with a thorough assessment considering all aspects of an introduced sound or noise and not simply relying on calculated levels where there is an inherent uncertainty but also undertaking a robust subjective assessment considering the character of the area and the character of the noise.

It is essential that any changes in design and location of substations must be considered in terms of noise assessment, this must be in terms of Sea link in isolation and cumulatively at the site with future projects dependant on the information available.

In terms of cumulative assessment and impact whilst the Saxmundham substation site is an area of particular concern should further projects co-locate there the applicant must be extremely mindful of cumulative impacts in relation to the numerous other projects in the area particularly in terms of construction noise, whilst there may be some assumed deconfliction to construction dates at this time these may change and as such review and re-assessment should be embedded in this process and project.

The following comments are made on the assessment and what has been scoped for assessment.

- a) Firstly, in terms of overhead lines, Significant adverse effects from noise from new overhead lines has been deemed unlikely and has been scoped out of further assessment. Further assessment needs to be undertaken to quantify the expected unlikely significant adverse effect and to quantify whether there are adverse effects and cannot be assumed.
- b) Secondly, the impacts from the connector substation at Friston have been scoped out on the basis that switchgear noise emissions would be impulsive in character and operation would be infrequent, there is no indication as to sound levels, how impulsive or how infrequent, neither is there consideration of the impact of this matter cumulatively with other projects and whether there is a point where the number of projects and the increase in equipment will cause an impact. It is very important to note that the Friston connection substation is part of the site rating levels and therefore it is a site constraint, the applicant

needs to be very confident that introduction of further or different equipment will not impact that constraint.

Whilst considering the above comments the applicant's assessment has indicated that with mitigation the sound levels at all nearby Noise Sensitive Receptors will be below background sound levels except for one location where background is achievable. This is welcomed by ESC and aligns with the expectations previously stated. We look forward to working with the developer going forward to exhaustively assess whether further reasonable improvements can be made to ensure this project is the best it can be in respect to noise and vibration.

13.3.2 The operational noise scoping response has been included below.

Operational noise and vibration scoping:

The proposed study area of 1000m from the proposed substation sites and the Friston Site is accepted along with the developer's emphasis on closer proximity Noise Sensitive Receptors. In respect to location the developer is advised that the National Grid Connector Sub Station at Friston is included in the EA1N and 2 Rating level for the site and as such this is a site wide constraint that they will have to meet.

The developer has proposed BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound (BS4142) in respect of operational noise assessment and this is accepted. The developer has also stated that the DCO will contain a requirement with an appropriate noise level, and this will need to be determined as a rating level using BS4142 in order to take account of any acoustic character to sound emissions and importantly to take account of the local context.

In respect of that context the developer has correctly stated that the majority of the area is quiet rural and residential in nature, the potential for the introduction of a 24 hour a day 7 days a week industrial noise source to have significant adverse impact exists and this is to be avoided along with adverse impact mitigated and minimised in line with NPS EN-1 and the Noise Policy Statement for England.

The developer is also required to consider cumulative effects with other committed or consented major projects, principally, but not necessarily limited to, Sizewell C and Scottish Power Renewables EA1N, EA2 and EA3 as well as other proposed major projects such as Euro link and Nautilus where there is information available to consider. "Noise creep" is a significant issue with the number of projects both potential and consented and needs to be considered, minimised and where possible prevented entirely.

The developer ascribes significance criteria to operational noise in line with NPS EN-1 and states that a significant adverse effect is considered to occur at large, or medium

magnitudes of impact which Table 2.10.9 describes as a rating level between 5 and 9dB above background and more than 10dB above background respectively. As Significant Adverse Effects are to be avoided it is therefore assumed the developer is expecting to achieve 4dB above background or less as a rating level.

Our current stance on noise from developments of this nature in this district may be summed up by the following condition used in Town and Country Planning Act applications but is equally relevant here and has been stated for other DCO projects we are involved with.

Noise from fixed plant or machinery (e.g., heat pumps, compressors, extractor systems, fans, pumps, air conditioning plant or refrigeration plant) can be annoying and disruptive. This is particularly the case when noise is impulsive or has tonal characteristics. A noise assessment should therefore be submitted to include all plant and machinery and be based on BS4142:2014. A rating level (LAeq) of at least 5dB below the typical background (LA90) should be achieved. Where the rating level cannot be achieved, the noise mitigation measures considered should be explained and the achievable noise level should be identified and justified.

Due to the size of these types of projects the 5dB below background is an aspirational target and one we ask developers to consider as the appropriate limit, deviation from this level will require robust justification and the aim in all cases should be to achieve the lowest possible sound level which we will also require robust justification for, this should be in line with all relevant standards, guidance and policy. The developer is reminded of the overarching principles of NPS EN-1 in terms of noise and vibration and particularly the requirement to mitigate and minimise noise impact although they appear very familiar with these principles which is comforting at this stage. Section 2.10.7.20 also Implies that adverse effects will be avoided, and the rating level will be set below background so that the impact is negligible as is “standard practice”, if this is the case it is to be welcomed.

The overall expectation for operational noise is that a robust assessment will be undertaken using BS4142, that an appropriate rating level will be proposed relative to an appropriate representative background sound level and that it will inform design and mitigation so as to reduce noise impact to an absolute minimum. There will be a need for a requirement in the DCO and dependent on the rating level that is proposed there may be a need for a further requirement with a commitment to reduce that rating level further should it be possible to do so at a later detailed design and implementation stage, the need to keep impact from operational noise to an absolute minimum cannot be understated and we will require robust justification in reaching agreement.

In terms of scoping operational vibration has been scoped out and this is accepted, all areas that have been scoped in are agreed. The developer has however stated that

noise from switchgear and emergency equipment such as generators and compressors should be scoped out, this is currently not agreed as it will be dependent on the likely frequency, duration and mitigation for these events and therefore further justification should be provided.

13.3.3 Construction Noise and Vibration

The Applicant has committed to using BS5228 - Code of practice for noise and vibration control on construction and open sites along with the ABC methodology within that code, this accords with other similar projects in the area and is accepted. Thresholds have been set relative to the lower noise thresholds (Category A) as detailed in Section E.3.2 of BS 5228-1 (the 'ABC' method) and are proposed to be used throughout as a worst-case, this is also accepted.

Construction noise LOAEL and SOAEL have been set in accordance with these thresholds and in terms of Weekdays 7:00am to 7:00pm, and Saturdays 7:00am to 1:00pm this appears reasonable, Table 2.10.8 also contains thresholds for other periods, and it is assumed that these are present to govern either emergency works or where the local planning authority has granted permission to work beyond the consented working hours.

In terms of working hours, the outline code of construction practice (OCoCP) states the following.

The proposed construction working hours are:

- Monday – Friday: 07:00am–19:00pm.
- Saturday: 07:00am–17:00pm.
- Sundays/Bank Holidays: non-working.

We do not currently consider Saturday afternoon to be acceptable and precedent has been set in respect to a similar project (requirement 23 for EA1N and 2) for Saturday to be 07:00-1300 and this should be applied here. Work outside these hours should be agreed with the Local Planning Authority and be of the type listed for this purpose in the OCoCP.

The magnitude of impact has been determined in line with The Design Manual for Roads and Bridges (DMRB) which is designed as the title suggests for the construction of roads and bridges, ESC is not therefore convinced of its appropriateness here.

The magnitude of impact assessment uses LOAEL and SOAEL in the determination of magnitudes. It is a concern that the highest level of magnitude, Large, is above +5dB above SOAEL and Medium being equal to or above SOAEL and below +5dB, given that SOAEL is a barrier to consent and must be avoided levels beyond SOAEL should not form any part of a scale for assessment as it should never occur, to include such a

criteria provides a false representation of the scale of magnitude and downplays the actual magnitude of impact, a medium impact being the highest theoretically achievable level of impact.

Construction Vibration has been determined in line with BS5228-2 and this is accepted, LOAEL has been set a 0.3 mm/s PPV and SOAEL a 1.0 mm/s PPV which appears to be reasonable.

In terms of vibration, ESC has similar comments in respect to the use of DMRB and the inclusion of above SOAEL magnitude levels in the magnitude of impact thresholds, SOAEL being a level to be avoided.

As the report acknowledges that Best Practicable Means (BPM and taken to be as defined by section 72 of the Control of Pollution Act 1974 and further described in BS5228) will be implemented, this should be committed to at all times with work and any noise mitigation carried out to BPM to ensure noise and vibration are kept to a reasonable minimum and not just below the relevant thresholds. BPM is a critical control point for a project of this scale.

A road Traffic Noise Assessment has been carried out, this is a highways authority matter which in this case is Suffolk County Council and we will defer to them in that regard.

The Construction Noise and Vibration response for the scoping exercise is copied below for completeness.

13.3.4 Construction noise and vibration scoping response

The proposed study area of 300m from construction areas is accepted, although this will not prejudice complaints from Noise Sensitive Receptors from further afield in the event the project is consented and implemented.

The developer has stated that BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Noise and BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Vibration (BS5228), and specifically the “ABC” methodology of those standards, are to be used in relation to impact from construction noise and vibration and this is accepted as suitable.

The developer had committed to Best Practicable Means (BPM), as defined in the Control of Pollution Act 1974 and expanded upon in BS5228: 2009+A1: 2014 in respect of site operations and mitigation for noise and vibration and this is welcomed. It is important that all relevant sections of BS5228 are considered and implemented including particularly section 8 – Control of Noise.

The developer has provided an Outline Code of Construction Practice (OCoCP) which includes noise and vibration management as is expected for this type of development and should be secured in a requirement in terms of compliance. The OCoCP provides a relatively high-level view of noise and vibration management and mitigation and provides for Construction Environmental Management Plans (CEMPs) to provide the detail in respect of specific works. The Local Planning Authority should have some input into construction activities in terms of mitigation and monitoring for noise and vibration and therefore should be included in approving the CEMPs, if this is not possible and that position is justified there may be a need for a more detailed Noise Management Plan (NMP) as an appendix to the CoCP and consideration of adopting a Control of Pollution Act 1974 Section 61 approvals process.

The developer should produce a detailed complaints and monitoring plan including when and how they intend to inform the Local Planning Authority, this should form part of the OCoCP, CEMP, NMP or S.61 as appropriate.

The developer has considered noise and vibration from construction traffic, it is assumed this is in respect of highway noise and vibration which is a Highways Authority matter, and that site construction traffic noise and vibration will be considered in respect of the overarching construction noise and vibration requirements under BS5228 and in the OCoCP.

The developer has ascribed significance in respect of construction noise and vibration, and this should be in line with the BS5228 “ABC” methodology as proposed.

13.3.5 oCoCP:

The oCoCP as an outline document is accepted and it is noted that there are further opportunities to assist in its development.

The Council which the applicant to note the following examples:

- a) Working Hours – Saturday working after 13.00 is not currently acceptable without robust justification. A comparable project has Saturday 07:00 – 13:00 as a requirement. Work can be undertaken outside of these hours as stated in the oCoCP, but this should be with Local Authority agreement to ensure that the works are indeed necessary. Necessity to carry out works out of hours is a key principle of BPM, if you don't need to do it at a sensitive time then you shouldn't. s61 agreements could be considered by the applicant as required.
- b) Complaints – the oCoCP describes an internal complaints procedure but this does not require engagement or notification with East Suffolk Council. We

would expect to be informed of complaints received and in a timely manner, along with any action taken.

- c) Emergency Action Plan – ESC should be informed of any incidents identified under the Emergency Action Plan so that we can consider if we need to be involved, and so that we have information should the public come to us for assistance.
- d) Contamination – There may be something in the relevant documents but the OCoCP should contain full reference to a discovery strategy should unexpected contamination be encountered along with a plan to resolve the situation and a commitment to seek agreement with us and the Environment Agency in any matter relating to the investigation and remediation of contamination discovered. This should broadly accord with the steps of our unexpected contamination TCPA condition.
- a. Best Practicable Means – This is a critical control point for this and all NSIPs in terms of mitigation of Noise and Vibration, and a principle that should spread across all areas of the project, doing the best they can to prevent impact. In terms of the principle of BPM as defined by Section 72 of the Control of Pollution Act 1974 and further defined in documents such as BS5228 it is noted that the relevant BPM for each work stream will be in the CEMPs. Presumably we will have sight of these and if not, we will need to be provided with at least the BPM work and mitigation should a problem arise to ensure the relevant BPM is actually in place. Internally there should be a principle of reviewing BPM in the event of a complaint to ensure that the work is being carried out to those principles, this is a precedent with other comparable projects.
- e) Health and Safety should be separated out from Environmental Considerations to avoid confusion.
- f) Construction Method Statements; CEMPs; Managements Plans – we need to be clear with the document hierarchy and where detail of mitigation (noise, dust, water, vibration and soil) will be found. The documents should be submitted and approved to ESC.
- g) It is not clear where the LOAELs in Table 2.10.8 have originated from.
- h) Table 1.4.A.2: Control and management measures – NV03 – we are a little concerned that this paragraph is not committing to the same rating levels (or absolute if more appropriate) as are discussed elsewhere (below or at worst matching background).
- i) Table 1.4.A.2: Control and management measures – GG13 – this paragraph refers to ‘plant’ and vehicles but only has commitment to vehicle standards and not plant. Please see comments in the air quality section of this response from more detail on this subject.

Whilst it is expected that there will be numerous management plans that exist below the oCoCP this document should contain sufficient information and commitments to prevention, minimisation and mitigation of impacts associated with construction to

provide confidence that Best Practicable Means in its wider context across all topics will be applied.

13.3.6 Inter Project Cumulative Effects:

Table 2.14.4 – Matrix summarising Stage 1 + 2 of the Inter Project Cumulative Effects: ESC is concerned that the peak year has been used as a basis for assessment and not progressing to the next stage. For example - A12 bypass; traffic, transport and air quality – not taking to stage 3 assessment due to peak year not occurring until after the bypass is operational. It is the same for many of the Sizewell C associated developments. The concern is that firstly, there may be impacts from this project (Sea Link) prior to peak year which should be considered; and secondly, timelines slip and change – sometimes significantly – potentially on all projects.

Regarding air quality – ESC may have more comments after the Highways Authority has had a chance to comment as they may identify areas of concern or impact that have not been considered.

It is suggested that if any project is carried through for stage 3 assessment for traffic and transport, then this should automatically also be put through for consideration of the impact on air quality if congestion related.

All areas of impact including air quality, dust and noise and vibration should be robustly assessed for inter project cumulative effects, the developer should be mindful that a review and re-assessment process should be implemented to ensure any changes to various project timelines are taken account of and addressed to avoid unexpected cumulative impact where previously impacts were low or scoped out on the basis of deconfliction between projects.

13.4 Private Water Supplies Comments

13.4.1 The district has numerous Private Water Supplies that could be sensitive to some of the construction methods likely to be employed by the project (such as trenchless ducting and dewatering if required), the developer should engage with ESC to ensure that these Private Water Supplies are considered and where necessary measures are taken to ensure that the supplies are not affected by works associated with Sea link.

13.5 Air Quality Comments

13.5.1 We acknowledge that a detailed air quality assessment will be carried out at the ES stage once further data is available. This is to include, but not limited to, emissions from construction site vehicle emissions; Non Road Mobile Machinery (NRMM); emissions from use of the back-up generator; and monitoring of air quality pollutants/dust. As has been recognised it is essential that cumulative effects with

other projects, with consideration of the impact of this project on traffic flows potentially some distance away, is included in the detailed assessment. Sensitivity tests for slippage of timelines should also be considered – both slippage within this project and for other projects.

- 13.5.2 We agree that air quality impacts associated with the operational phase vehicle emissions can be scoped out for further assessment.
- 13.5.3 Emissions from Construction Site dust – we acknowledge that the assessment for dust has concluded that a high level of mitigation is required. It is agreed that a Dust Management Plan for the project should be developed, submitted to and agreed with ESC.
- 13.5.4 There is some consideration of NRMM within the current documents and we acknowledge that this is to be considered further in an air quality assessment at the ES stage. In line with some other projects and given the potential impact on local air quality from the numerous additional NRMM in use within the surrounding area local to this project, we would like to see a commitment to reducing emissions from this source as much as possible. This should involve a commitment to use of renewable energy sources such as solar banks for charging batteries where possible, use of electricity or batteries, with use of diesel as a last resort. A commitment to use of Stage 4 NRMM as a minimum, and stage 5 where possible should be made.
- 13.5.5 The commitment to Euro standards made in the CoCP for vehicles associated with the site is positive. This will require monitoring for compliance.

13.6 Land Contamination Comments

- 13.6.1 The developer has undertaken a preliminary contaminated land risk assessment which has not indicated any locations where contamination is likely to exist beyond a low risk. This Assessment has been carried out in line with the principles of the Environment Agency's Land Contamination Risk Management (LCRM), this is the applicable guidance in this respect. This is clearly based on current knowledge and locations should be reassessed on a case-by-case basis should further information come to light.
- 13.6.2 Whilst the current risk of contamination is low and it is accepted that much of the route is isolated and agricultural or wild in nature this does not preclude the possibility of unknown contamination that may be encountered during the development given the amount of excavation required. The developer should provide contaminated land management plan which covers a robust discovery strategy and procedures for managing contamination should it be found unexpectedly; this must include consultation and agreement with the Local authority in respect of investigation and remediation required in the event this scenario occurs.

13.7 Landscape Comments

13.7.1 Non-Technical Summary

Para 5.1.5 and later contains a potentially misleading reference to a landscape character area (Fromus Valley, Heveningham and Knodishall Estate Claylands *coastal landscapes*) from Suffolk Coastal Landscape Character Assessment. The main name is correct but also includes reference to coastal landscapes. It may be that this is a reference to the eastern and therefore coastal side of the Landscape Character Area but this should be clarified for the avoidance of doubt.

13.7.2 PEIR

The setting out of the policy framework is comprehensive and considered fully inclusive.

The consideration of the AONB Special Qualities is appropriate and welcomed.

3.1.1 It is agreed operational lighting should be scoped in given the rural location of converter station.

3.1.6 Although the current PEIR study area has been agreed with ESC, we welcome the proposal to keep it under review as the project evolves.

2.2.8.32 Visual receptors - Noted but the Council has concerns about some of the Value assessments given to the selected viewpoints in section 2.2.8.32 Table 2.2.17. The rationale for attributing Medium value to some PROWs and High and Very High to others is not wholly clear. We recommend that the developer discuss these issues with the Council before the LVIA is progressed any further.

2.2.9 Mitigation Measures - Draft Mitigation Measures Figures 1.4.3 and 1.4.7 in PEIR Vol 3 Part 1 Chapter 4 and Table 1.4.F.6 are noted and the Council welcomes ongoing dialogue to achieve the optimum outcome for the Saxmundham site. N.B. the reference to the Richborough Energy Park and the wider marsh landscape would seem to be incorrect in respect of the Saxmundham site and probably refer to the Kent converter station site.

In respect of Control and Management Measures (2.2.9.3), where retention and protection of existing vegetation (trees and hedgerows) is a key component of the mitigation strategy, and indeed as a general principle of the project as a whole, the Council will expect pre-commencement tree and hedgerow surveys to be carried out to identify the most important landscape components and how to protect them during construction.

It is recommended that cleared hedgerows should be chipped and re-used as mulch for new planting areas.

2.2.9.4 - Noted but the Council will need to understand how wider landscape mitigation measures can reliably be delivered on land outside Order limits, e.g., along B1119 out of Saxmundham.

In respect of other matters relating to mitigation related issues:

Table 1.4.A.2 CoCP Control and Management Measures ref:

GG03 - The later production of a Landscape and Ecological Management Plan (LEMP) is noted but the Council recommends that the developer engages with its technical officers at the earliest opportunity to ensure a collaborative ongoing dialogue in respect of landscape mitigation matters.

GG08 and GG09 - The outline proposed measures are noted, but given their very high-level outline nature, further comment is unrealistic at this stage. The Council would welcome closer dialogue with the developer as more detailed proposals emerge.

LV01 and LV02 - The intention to retain vegetation where practicable is noted and the Council will expect retained vegetation to be fully protected according to recommendations contained in BS5837:2012 Trees in Relation to Construction (LV02 refers to this and is noted). Further, the Council will expect all proposed hedgerow crossings along the cable route and hedgerows affected by the converter station proposals to be assessed against the criteria for 'Importance' laid out in the 1997 Hedgerow Regulations. Where hedgerows meet the criteria for 'Importance' under the Regulations, the Council will have an expectation that these should be retained at least along the cable route and alternative solutions to open trenching put forward.

LV03 The proposed five-year aftercare period for reinstatement and mitigation planting is noted, but it should be understood that the Council will be requiring this five-year period to also apply to all replacement planting that covers any plant failures. i.e., it should be a rolling five-year period for all planting from the time of planting.

The limitations of replacing removed trees in a like for like basis in the vicinity of installed electrical cables is understood.

LV04 and LV05 Soil management proposals noted.

13.7.3 Preliminary Assessment of Effects

The assessment of anticipated Landscape Character effects at construction, maintenance (assumed to mean 'operation') and decommissioning seems acceptable and realistic at this stage, but issues emerging from finer details may form topics for further discussion.

As above, the preliminary assessment of visual amenity effects at construction, maintenance (assumed to mean 'operation') and decommissioning for the various viewpoints is noted.

The preliminary assessment is less clear on the role of mitigation planting in moderating the magnitude of effects over time. This needs to be made much clearer and once incorporated in the assessment, should include a realistic understanding of growth rates for new planting in the East of Suffolk. It needs to be understood that erratic and unpredictable rain fall patterns, notwithstanding the late summer and autumn of 2023, can be a very limiting factor in successfully establishing new tree and shrub planting. We expect to be advised of the anticipated growth rates as the LVIA progresses. Once understood and agreed, it is expected that photomontages/wireframes will include depictions of mitigation planting at Year 1, Year 5 and Year 15 post planting.

Issues surrounding the question of colocation at the converter station site and possible loss of mitigation planting relied on to moderate adverse visual effects arising from a single converter station need to be more clearly presented. A lack of project co-ordination could lead to unforeseen adverse effects on visual amenity through removal of previously relied upon mitigation.

Any acceptability of the proposed landfall option (S2) is wholly dependent on the use of trenchless technology to pass under the Leiston to Aldeburgh SSSI and North Warren RSPB bird reserve.

In respect of the potential impact of the proposed options for access road routes to the converter station:

South Eastern Access 1 Redhouse Farm - This option would seem likely to be of least landscape impact, but it still carries risk to hedgerows and landscape character.

Northern Saxmundham Access 2 off B1121 - This option will have direct impacts on Carlton Park which is a locally listed historic parkland, on TPOs, roadside hedgerows and the setting of the Saxmundham Conservation Area.

Southern Saxmundham Access 3 off B1121 - This option will have direct impact on the Fromus valley landscape, willow woodland block, and roadside hedgerows.

With regard to any proposed accesses onto the highway, these will need to be presented with accurate and realistic visibility splay requirements. It will not be acceptable for the Council to be forced to accept a whole string of post consent requirements for additional roadside hedgerow and tree removal needed to achieve splays that should have been properly assessed and presented as part of the DCO submission process.

13.8 Coastal Management Comments

13.8.1 The many consultation documents that appeared to me to have potential to include a reference to landfall impact assessments have been reviewed. Also key word searches undertaken including landfall, coastal and erosion. No reference to any consideration of coastal change or impacts on/from existing or planned coastal control structures within the consultation documents have been found.

13.8.2 The Strategic Options Report includes the following text:

1.3 Assessment Principles Applied by Decision Maker

1.3.1 Part 4 of EN-1 sets out the general policies that are applied in determining DCO applications relating to new energy infrastructure. Paragraphs 2.3-2.5 of EN-5 set out the general assessment principles in the specific context of electricity networks infrastructure. Those impacts identified in EN-1 include air quality and emissions, biodiversity and geological conservation, civil and military aviation and defence interests, coastal change (to the extent in or proximate to a coastal area), dust, odour, artificial light, smoke, steam and insect infestation, flood risk, historic environment, landscape and visual, land use, noise and vibration, socio-economic effects, traffic and transport, waste management and water quality and resources. The extent to which these impacts are relevant to a particular stage of a project, or are a relevant differentiator at a particular stage of the options appraisal process, will vary. In particular, some of these impacts are scoped out of this stage of the options appraisal process for this project.

13.8.3 It is therefore assumed that the developer has scoped out coastal change from this stage of the process. If that is the case, it is a significant oversight.

13.8.4 The section of coast proposed for the landfall is managed by the Environment Agency and so they should lead on responding to the developer.

13.8.5 ESC has responsibility for managing coastal frontages to north (Thorpeness) and south (Aldeburgh) of the proposed landfall and so would have an interest in the findings of a coastal change / management impact assessment.

13.9 Tourism & Economy Comments

- 13.9.1 The Sea Link project has the potential to adversely affect the east Suffolk economy throughout its lifecycle. The construction works at the landfall and along the cable corridor in addition to the construction works and permanent infrastructure at the converter station site and connection site will have an alone and cumulative effects that is of significant concern.
- 13.9.2 The visitor economy is one of largest sectors in east Suffolk, contributing c. £700m to the local economy annually and supporting around 11,000 (FTE) jobs. This accounts for 15% of all employment in the district. The continued success of the visitor economy is dependent on its reputation as a holiday destination, and the overall experience offered to visitors. The East Suffolk Visitor Economy Strategy identifies that together, the coastline, towns and places, natural landscape, and cultural offer present a compelling experiential proposition for the visitor.
- 13.9.3 ESC is concerned that the cumulative impact of Sea Link in addition to the other proposed energy projects will negatively affect the visitor experience, damaging the reputation and perception of the district as a holiday destination, therefore negatively affecting the visitor economy throughout the lifetime of the project(s)
- 13.9.4 The impact of the Sea Link scheme will not be limited to the immediate vicinity of the proposed landfall, converter station, connection infrastructure and cable corridor locations. There is a high degree of interdependency between visitor destinations, employment, and supply chains within east Suffolk. Visitors move from destination to destination, employees need to access their employment, and the potential for the displacement of visitors during construction should not be ignored.
- 13.9.5 Should this project proceed, it is essential that this impact is appropriately considered, and sufficient mitigation is provided to support the continued success of the visitor economy.
- 13.9.6 ESC notes and welcomes the potential opportunity that Sea Link presents in generating 'direct and indirect temporary employment, training, and apprenticeship opportunities both on site and in the supply chain during the construction, maintenance, and decommissioning phases of the scheme.' However, the Council would like to be reassured that any direct or indirect employment opportunities are accessible to the resident population of East Suffolk, and that any potentially negative effects on employment within the visitor economy and wider business population are suitably assessed and mitigated.
- 13.9.7 The Council notes the opportunities to improve awareness of the wider energy sector across east Suffolk and the high value/high skill employment and apprenticeship

opportunities available. Greater information about workforce planning for the Sea Link project is required.

- 13.9.8 The decision maker needs to be able to balance the potential benefits which may result from the temporary employment, training and apprenticeship opportunities created against the disbenefits of the project.

13.10 Economic Development and Regeneration (EDR) Comments

- 13.10.1 In October 2022, EDR responded to the Sea Link non-statutory consultation expressing concern over the scheme's potential for negative socio-economic impacts affecting businesses, employment, and the wider economy. Especially the potential for cumulative adverse socio-economic effects resulting from multiple energy infrastructure projects scheduled for development in east Suffolk over the next decade.

- 13.10.2 Tourism is one of the largest economic sectors in East Suffolk and is dependent upon its perception and reputation as a visitor destination providing a high-quality experience to visitors. EDR continues to consider the visitor economy to be particularly sensitive to the cumulative effects described above.

- 13.10.3 EDR are somewhat reassured to note that within the Sea Link statutory consultation, concerns about the cumulative impact of multiple infrastructure projects in east Suffolk are being addressed, and that opportunities for the co-ordination of multiple infrastructure projects and the co-location of infrastructure elements are being explored. However, 'Table 2.14.38 Socio-Economics, Recreation and Tourism CEA' states that there is insufficient information to determine any cumulative effects at this stage. Therefore, EDR will continue to monitor and review the progress made in evaluating cumulative effects once the Environmental Statement is published in due course.

- 13.10.4 EDR expressed a concern during the non-statutory consultation about baseline data methodology, recognising a need for caution when relying on purely desk-based research and digital modelling to establish the socio-economic baseline, and ongoing monitoring and assessment of socio-economic impacts.

- 13.10.5 EDR recognises the limitations of certain 'standard' datasets and believes that additional field base assessments including visitor, business, and resident surveys should be conducted to establish baseline information for some of the more qualitative or intangible impacts of the scheme. Especially, the perception of business owners and visitors towards the scheme, the impact on the visitor experience and reputation throughout the project life cycle, and the impact on the movement of residents, and visitors during the construction phase.

13.10.6 This approach could create a more dynamic reporting methodology, allowing real-time understanding of the socio-economic impact of the Suffolk Onshore Scheme. This is congruent with the PEIR, paragraphs 2.11.4.26 and 2.11.4.27.

13.10.7 EDR notes that within the Preliminary Assessment Effects, paragraph 2.11.9.4 that the Suffolk Onshore Scheme might create 105 net additional jobs during the construction period. The significance of energy generation and transmission to east Suffolk means that EDR would welcome the opportunity to discuss the possibility of a 'NGET outreach' programme, like NGET's 'Connect Partnership', providing a series of in-person workshops, seminars, and Q&A sessions for local students.

13.10.8 In terms of the PEIR, the following comments are made:

- a) EDR acknowledges the use of NPS EN-1 (2011) in determining the socio-economic considerations for the PEIR and welcomes inclusion of the additional requirements identified within the published draft NPS EN-1 (2023).
- b) EDR concur with the potential socio-economic impacts identified within Table 2.11.1.
- c) EDR confirms that it was able to engage with NGET through the non-statutory consultation in November 2022, and again through the online thematic meeting in August 2023. Table 2.11.2.
- d) The NPPF requirements relevant to socio-economic requirements are welcome, especially those where potential project impacts could adversely affect economic growth and productivity across local economic centres and key industrial sectors such as tourism. Table 2.11.3.
- e) EDR appreciates the inclusion of, and reference to key economic development strategies (East Suffolk Economic Strategy 2022-202, East Suffolk Visitor Economy Strategy 2022-2027 and East Suffolk Cultural Strategy 2023-2028).
- f) ID 3.10.1 refers to the creation of permanent operational phase employment, training, and apprenticeship opportunities, both directly and indirectly in East Suffolk. EDR accepts that the scale of operational employment is likely to be very limited and that this matter should be scoped out of the assessment.
- g) ID 3.10.2 scopes out an assessment of the generation of GVA in East Suffolk during the operational phase. EDR accepts that during the operational phase, any effect on GVA will be small.
- h) ID 3.10.3 EDR welcomes the introduction of routes connected via the road network as well as recreational routes and public rights of way when assessing impacts on local communities.
- i) EDR welcomes the additional assessment of the impact of the changing influx of the construction workforce on local accommodation facilities and their effect on the local tourism industry. Paragraph 2.11.3.3.

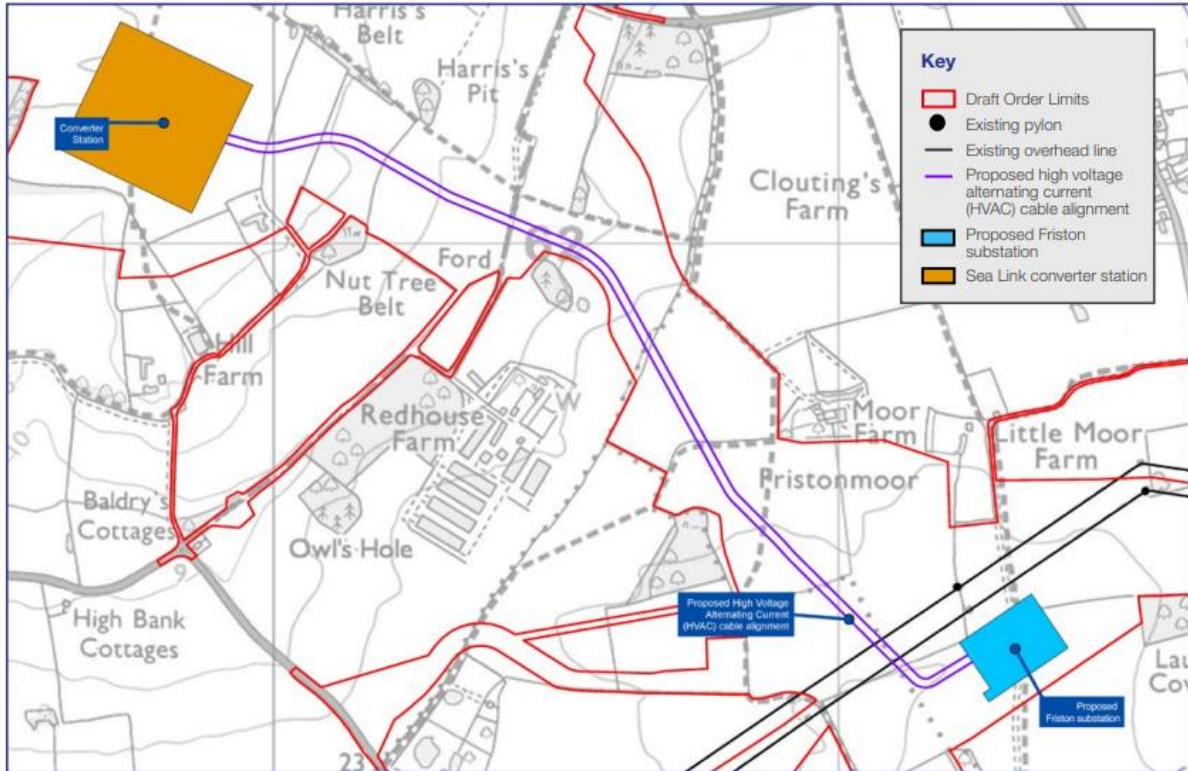
- j) EDR are satisfied with the overarching approach described in paragraph 2.11.41 which 'determine the baseline conditions, sensitivity of the receptors and magnitude of effects and sets out the significance criteria that have been used for the preliminary socio-economics, recreation and tourism assessment'. However, where the assessment aims to adopt an objective and quantifiable approach, EDR recognises that some effects can only be evaluated on a qualitative basis and is supportive of the PEIR definition of effects described in 2.11.4.8.
- k) EDR is supportive of the adopted methodology described in 2.11.4.10 for assessing the significance of project effects on the defined receptors.
- l) The economic additionality assumptions described in Table 2.11.6 and the economic impact criteria described in paragraph 2.11.4.14 including the sensitivity and magnitude criteria in 2.11.4.5 and tabulated in tables 2.11.7 and 2.11.8 are considered appropriate for the assessment of the socio-economic receptors relating to employment and GVA.
- m) Likewise, the magnitude and sensitivity criteria adopted to assess the direct and severance effects on public rights of way and private, community, recreation and tourism assets described in tables 2.11.9 through to 2.11.12 are considered appropriate.
- n) The basis of assigning significance of effects in image 2.11.1 is appropriate.
- o) EDR supports the requirement for built in design flexibility and the need to consider alternative scenarios outlined in paragraph 2.11.5.1, Table 2.11.13 and Table 2.11.14.
- p) The option for co-location with National Grid Ventures proposed Nautilus and LionLink (formerly known as EuroLink) interconnector projects is welcome. Especially where it has the potential to reduce the potential for adverse socio-economic impacts, especially during the construction phase of each project. Paragraph 2.11.5.7 and Table 2.11.15.
- q) The different components of the socio-economics recreation and tourism effects assessment presented in Table 2.11.16, describing the geographic scale at which each component is assessed, and the rationale behind the geographic scales need to be considered.
- r) When considering the 60-minute travel area for employment generation and GVA during the construction phase, the use of CIPD national commute data may not reflect the true geographical area of impact, particularly for those direct, highly specialised, and technical trades required for construction of electricity transmission infrastructure.
- s) When considering the 1km and 500m radii, especially for local communities, business premises and visitor attractions, EDR believes that it is important to recognise the degree of interdependency between visitor destinations, employment, and supply chains throughout east Suffolk. Professional judgement and experience should be used to consider the potential for direct and indirect impacts that fall outside of the proposed geographical areas of impact.

- t) EDR recognises the limitations of certain datasets, especially the time lag between data collection, analysis and publication and believes that additional field base assessments including visitor, business, and resident surveys should be conducted to establish a baseline for some of the more qualitative or intangible impacts of the scheme.
- u) In addition, the appropriate frequency of data sampling should be considered. However, EDR agrees with the benchmarked standard in paragraph 2.11.7.2
- v) Paragraph 2.11.7.30 and Table 2.11.20 identifies 27 business premises within 500m of the Suffolk Onshore Scheme Order Limits. Within the list of premises, it is notable that 12 can be described as closely linked to recreation and tourism and it could be argued that these could be more sensitive to the construction phase of the Suffolk Onshore Scheme than other business premises. The list includes a golf club, holiday lets, campsite, and a café. EDR would like to know more about the methodology planned for assessing the impact of the scheme during the construction phase of the project.
- w) In addition, the visitor attractions listed in 2.11.7.31 could be more sensitive to environmental impacts during the construction phase due to their status as visitor destinations.
- x) The categories of mitigation measures described in 2.11.8.2 and 2.11.8.3; whether embedded measures; control and management measures; and mitigation are as expected and EDR welcome active measures such as 'keeping the community and local businesses informed' providing that they are comprehensive and maintained throughout the construction phase.
- y) EDR notes that in Table 2.11.38, the preliminary assessment considers the preliminary project effects on construction employment within the Economic Study Area, and employment to have a small beneficial effect which is not considered significant.
- z) EDR notes that in Table 2.11.39, the preliminary assessment of socio-economics, recreation, and tourism effects of the project on construction employment within the Economic Study Area, and employment to have a small beneficial effect which is not considered significant.

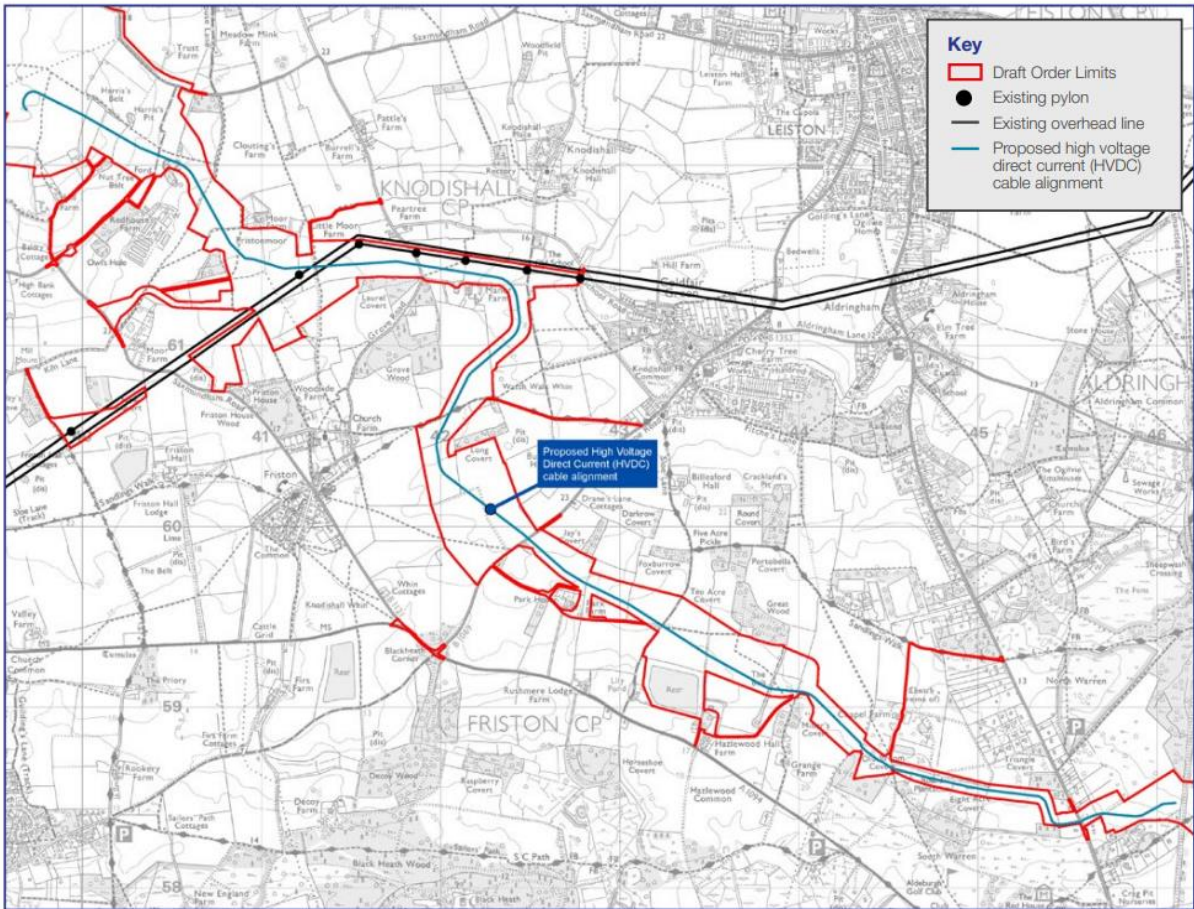
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Appendix B

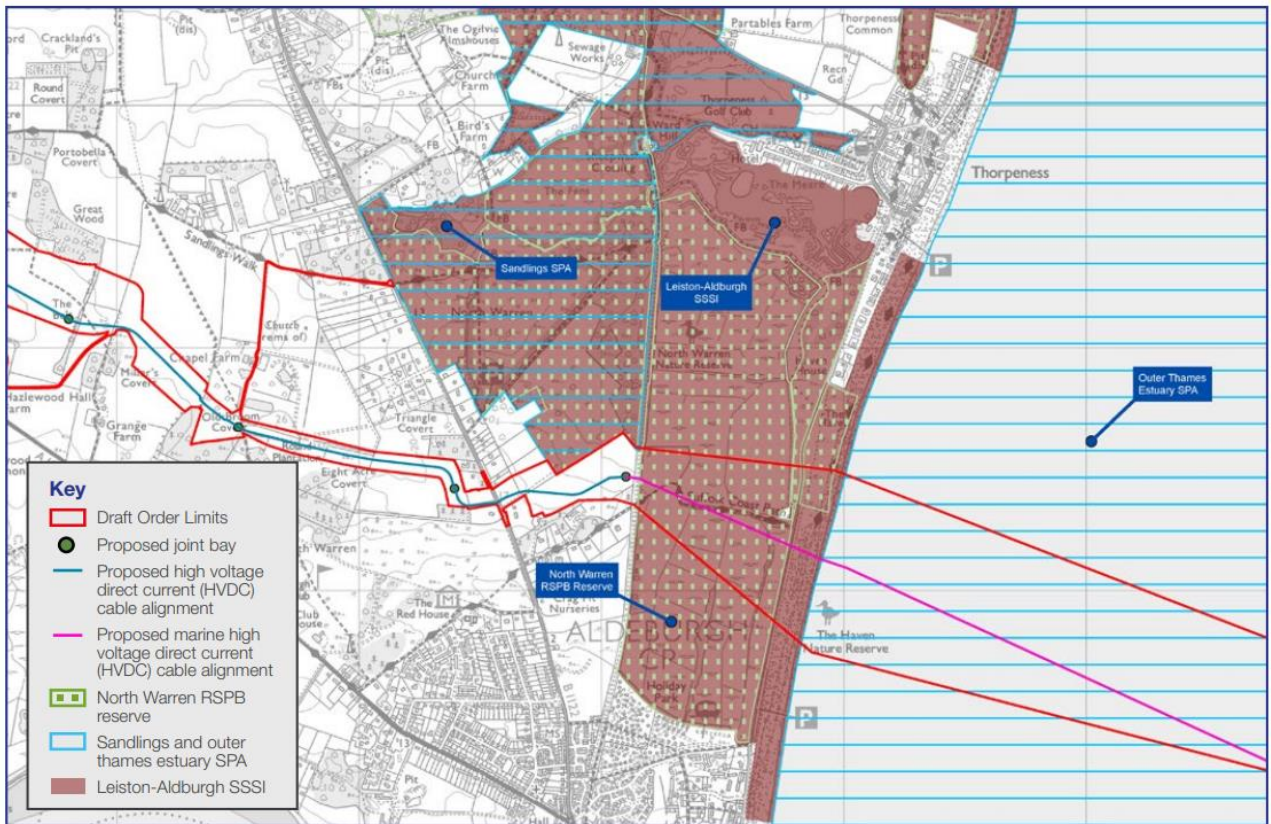
Proposed Friston Substation And Proposed Saxmundham Converter Station With Underground Cable Router Between



Route Of Underground Cable From Saxmundham to North Warren via Friston



Route of Underground Cable from North Warren To The Coast





CABINET
Tuesday, 02 January 2024

Subject	Housing Regulation – Quarterly Update
Cabinet Member	Councillor David Beavan Deputy Leader and Cabinet Member with responsibility for Housing
Report Author(s) / Head of Service	Heather Fisk Head of Housing heather.fisk@eastsoffolk.gov.uk
Director	Andrew Jarvis Strategic Director andrew.jarvis@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:

To provide an update to Members on housing regulation matters, which led in May 2022 to a Regulatory Notice being issued to East Suffolk Council (ESC) by the Regulator of Social Housing (RSH) for a breach of the Home and Rent Standards.

This report follows [ES/1675](#) the previous quarterly update, which was provided to Cabinet on 3rd October 2023. Section 2 of this report has been re-written to describe progress and status.

These quarterly updates are required, as set out in paper [ES/1432](#), which was presented to Full Council on 25th January 2023. At the meeting recommendation 6 stated: “Members note that quarterly updates will be presented to Cabinet, detailing the progress against the Compliance and Rent Improvement Plans.”

Options:

This report is provided for information purposes only. There is no requirement for Cabinet to make a decision.

Recommendation/s:

1. That Cabinet notes the information contained within this report and endorses the actions set out to ensure the Council is compliant with the Regulator of Social Housing Consumer ‘Home Standard’.
2. That Cabinet notes the information contained within this report and endorses the actions set out to ensure the Council is compliant with the Regulator of Social Housing ‘Rent Standard’.
3. That Cabinet note that the next quarterly update will be presented to April 2024’s Cabinet Meeting.

Corporate Impact Assessment

Governance:

The Council commissioned an external, independent review of the governance of the housing service, to ensure that the right governance arrangements are in place, which will prevent any such breaches of the social housing regulatory standards from occurring in the future. This report was completed in early 2023 and a final report issued in June 2023. This report, [ES/1593](#), was discussed at Audit and Governance Committee on 10th July 2023 and the recommendations in the report were accepted by the Committee.

To ensure the effective monitoring of compliance of the housing assets, the Housing, Health and Safety Board continues to meet monthly.

ESC policies and strategies that directly apply to the proposal:

The [Housing Strategy 2017-2023](#) sets out the Council’s commitment to investing and improving its housing stock.

The [HRA Business Plan](#) sets out the proposed investment in the Housing Stock over a 30-year period.

The [Rent and Service Charge Policy](#) 2023 sets out the Council’s approach to Rent and

Service Charge setting.

Environmental:

There are no environmental factors affected by this issue.

Equalities and Diversity:

An EQIA was completed to accompany the report to Full Council in January 2023, where certain policy decisions were made. The reference for this EQIA was 'EQIA477820335'. As this report is an update on progress made and no decisions are required, a further EQIA is not required.

An EQIA is currently being undertaken for the process of refunding current and former tenants. The process for former tenants is particularly complex because of the steps required to verify the identities and bank accounts of former tenants (to prevent fraud).

Financial:

The Council can charge two types of rent: Social Rent and Affordable Rent.

A Social Rent (SR) should not be higher than 'formula rent', which is calculated based on the relative value of the property, relative low-income levels, and the size of the property. An aim of this formula-based approach is to ensure that similar rents are charged for similar socially rented homes, throughout the country taking account of regional factors.

For an Affordable Rent (AR), the initial rent should not be set higher than 80% of market rent (inclusive of service charges), as well as at any future relet.

There are 145 properties within the East Suffolk HRA stock that are legitimately being charged an affordable rent and indeed are required to be charged such a rent as the properties were either a new build or an acquisition with the use of Right to Buy (RTB) receipts to fund the purchase. These properties are therefore outside of the rent repayment matters being updated on in this report.

It was agreed at Full Council in January 2023, that properties previously converted from Social to Affordable Rent would have their rent re-set back to Formula Rent plus flexibility. This was completed at the start of the new Financial Year, in April 2023.

ESC had been charging additional charges in relation to heating servicing. ESC received specialist legal advice that these charges should not have been levied and therefore, a full refund must be administered to all affected current and former tenants. These charges were removed from all Rent Accounts at the start of the new Financial Year, in April 2023.

The Forensic Audit for 2010/11 – 2021/22 was completed in February, and a 'mini audit' for FY 2022/23 was completed in June. The final figures for over-payments made by tenants for the 13 years during the period FY 2010/11 to FY 2022/23 are as follows:

Service Charges	Rent	Total
4,511,810	£4,181,963	£8,693,774

Human Resources:

Since the issues were first identified, significant officer time has been spent working intensively to resolve them. In addition to this, interim support was employed to support the work programme. This included external specialists to deliver the forensic audit, and compliance experts to support the work related to stock compliance.

To enable the refund process to happen at pace, we have recruited additional staff on a fixed term basis to support this work.

We have created a new team to manage the compliance of our housing assets, who will lead on contractual management of the external specialist contractors for Fire, Legionella, Asbestos, Heating and Lift Safety. A Senior Contracts Manager was recruited in early 2023 but resigned from their post in July 2023. We have failed to secure a candidate through recruitment to date, and will advertise again in January 2023

We will shortly be requesting permission to recruit to an additional role, which will focus on Electrical Safety and ensure the effective management of EICR's, so they are treated separately to the day-to-day work scheduling.

We have recruited an additional Housing Information Officer to boost capacity for the effective management of Housing information and data and additional recruitment of another Information Officer is currently being considered.

ICT:

As part of this programme of work, ESC has identified that significant work is required to improve the quality of data held electronically in relation to the effective management of the housing stock. Therefore, system updates are being planned and implemented as required. This includes implementation of a new module for our Asset Management system to manage the cyclical servicing of essential components and equipment in properties e.g., heating systems, alarm systems. Implementation will be completed in April 2024.

Legal:

The Housing and Regeneration Act 2008 sets out that Local Authorities with social housing stock are "registered providers of social housing". Registered Providers are governed by the [Regulator of Social Housing](#).

There are a multitude of legislative and regulatory responsibilities that Registered Providers of Social Housing must ensure they adhere to including the Regulator of Social Housing Standards as well as Policy Statements issued by the Department for Levelling Up Housing and Communities.

The regulation of Social Housing is increasing significantly and there are many changes, which it is essential that ESC complies with.

On 20 July 2023, the [Social Housing Regulation Act](#) received Royal Assent and will now be enacted in April 2024. This introduces a stronger regulatory regime for Registered Providers and delivers the measures set out in the [Social Housing White Paper](#). There is a significant programme of work now being developed to ensure the Housing Service is able to meet the new proposed [Consumer Standards](#).

The [Smoke and Carbon Monoxide Alarm \(Amendment\) Regulations 2022](#) amend the Smoke and Carbon Monoxide Regulations 2015 to remove the exemption of social landlords, so that from 1 October 2022 housing associations and local authorities were subject to the 2015 Regs.

This means that from this date ESC must ensure:

- At least one smoke alarm is equipped on each storey of their homes where there is a room used as living accommodation: and
- A carbon monoxide alarm is equipped in any room used as living accommodation which contains a fixed combustion appliance (excluding gas cookers)

In addition to this, there is new legislation either planned or recently approved, which will shortly be enacted. These include:

There are two key pieces of Legislation, which have received Royal Assent, following the review of the Grenfell Tragedy in 2017.

The new duties set out in the Building Safety Act 2022 and Fire Safety Order (England) 2022, will require the Council to carry out new programmes of work, to ensure they meet the duties.

[Building Safety Act 2022](#)

The Building Safety Act makes significant reforms to give residents and homeowners more rights, powers, and protections, which will ensure that homes across the country are safer.

It delivers protections for qualifying leaseholders from the costs associated with remediating historical building safety defects and includes an ambitious toolkit of measures that will allow those responsible for building safety defects to be held to account.

It overhauls existing regulations, creating lasting change and makes clear how residential buildings should be constructed, maintained and made safe.

The Act creates three new bodies to provide effective oversight of the new regime: the Building Safety Regulator, the National Regulator of Construction Products and the New Homes Ombudsman.

Together these changes mean owners will manage their buildings better, and the home-building industry has the clear, proportionate framework it needs to deliver more, and better, high-quality homes.

Many of the detailed provisions in the Act will be implemented over the next two years through a programme of secondary legislation.

[The Fire Safety \(England\) Regulations 2022](#)

The requirements set out in the Fire Safety Regulations 2022 came into force 23rd January 2023.

These regulations will make it a requirement in law for responsible persons of high-rise blocks of flats to provide information to Fire and Rescue Services to assist them to plan and, if needed, provide an effective operational response.

Also, the regulations will require responsible persons in multi-occupied residential buildings which are high-rise buildings, as well as those above 11 metres in height, to provide additional safety measures.

In all multi-occupied residential buildings, the regulations require responsible persons to provide residents with fire safety instructions and information on the importance of fire doors. The regulations apply to existing buildings, and requirements for new buildings may be different.

In high-rise residential buildings, responsible persons will be required to:

Building Plans: provide their local Fire and Rescue Service with up-to-date electronic building floor plans and to place a hard copy of these plans, alongside a single page building plan which identifies key firefighting equipment, in a secure information box on site.

External Wall Systems: provide to their local Fire and Rescue Service information about the design and materials of a high-rise building's external wall system and to inform the Fire and Rescue Service of any material changes to these walls. Also, they will be required to provide information in relation to the level of risk that the design and materials of the external wall structure gives rise to and any mitigating steps taken.

Lifts and other Key Fire-Fighting Equipment: undertake monthly checks on the operation of lifts intended for use by firefighters, and evacuation lifts in their building and check the functionality of other key pieces of firefighting equipment. They will also be required to report any defective lifts or equipment to their local Fire and Rescue Service as soon as possible after detection if the fault cannot be fixed within 24 hours, and to record the outcome of checks and make them available to residents.

Information Boxes: install and maintain a secure information box in their building. This box must contain the name and contact details of the Responsible Person and hard copies of the building floor plans.

Wayfinding Signage: to install signage visible in low light or smoky conditions that identifies flat and floor numbers in the stairwells of relevant buildings.

In residential buildings with storeys over 11 metres in height, responsible persons will be required to:

Fire Doors: undertake annual checks of flat entrance doors and quarterly checks of all fire doors in the common parts.

In all multi-occupied residential buildings with two or more sets of domestic premises, responsible persons will be required to:

Fire Safety Instructions: provide relevant fire safety instructions to their residents, which will include instructions on how to report a fire and any other instruction which sets out what a resident must do once a fire has occurred, based on the evacuation strategy for the building.

Fire Door Information: provide residents with information relating to the importance of fire doors in fire safety.

Specialist Legal Advice

As part of the review into these regulatory matters, ESC has sought specialist external opinion from Trower's and Hamlin Law Firm. They have advised on a number of aspects specifically in relation to the Rent Standard and historical decisions made, which were at odds with guidance and / or legislation.

Risk:

This area of work has been added to the Corporate Risk Register.

Risk Description:

ESC has been found to not be compliant with the Rent Standard and 'Home' Consumer Standard following self-referral to Regulator for Social Housing. Rental charges dating back to ESC's predecessor authority Waveney District Council (WDC) did not meet requirements set out in 'Rent Standard'. Tenants who moved in after 2014 were potentially charged higher rents. Review also included aspects of health and safety of properties, inc. fire risk assessments, asbestos management, water safety, gas and electrical safety, etc.

Current Controls:

- Council self-referred to Regulator of Social Housing (RSH) in February 2022.
- In-depth review of the Housing Service conducted in line with the Regulatory (Rent) and Consumer Standards.
- Independent consultants appointed to review historic approach to rent conversions and to assess whether there are/were any other areas of non-compliance against the rent standard.
- Legal opinion sought on other service charges.
- Thorough audit of all aspects of compliance and development of action plan.
- ESC commissioned an independent inquiry into the governance/decision making issues raised in respect of the Rent Standard issues. The inquiry report was completed in May 2023.
- ESC has recruited a new Strategic Director position, focused on governance, bringing leadership, direction and organisational resilience.

Mitigations:

- Forensic audit of potential overpayments of rent, has been conducted looking at every rent account, line by line. The audit is 100% complete, and definitive figures for overpayments made by tenants are determined. A proportion of these overpayments will be refunded to DWP/Housing Benefit, but this data must be calculated by ARP and is not available yet. The data is being used to improve financial projections of potential tenant overpayments.
- Compliance consultant employed to ensure the right policies, processes and mechanisms for monitoring are in place to provide assurance that the housing stock is compliant with the Homes Standard. Ongoing work is delivering remedial safety works to buildings.
- Regular meetings are scheduled with Regulator for Social Housing, and reports are provided between meetings.
- A permanent Housing Health & Safety Board has been created and provides senior level monitoring, control and direction.
- A substantial Improvement Programme is being developed for the Landlord's Service, supported by external Consultants.
- A full Asset Review of the high-rise building, St Peter's Court, is underway. This will inform decisions about financial investment in the building, including safety works to improve ESC safety standards.

Current Risk Score:

C2 (Amber)

External Consultees:	Not applicable
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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 checked="" 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 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 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 checked="" type="checkbox"/>
P17	Effective use of data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
P18	Skills and training	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>
How does this proposal support the priorities selected?			
ESC is a social landlord who wants to be a landlord of choice and provide high-quality, affordable homes in communities where residents are proud to live.			

Background and Justification for Recommendation

1 Background facts	
1.1	East Suffolk Council (ESC) owns and is the social landlord for approximately 4,500 properties, which are managed through the Housing Revenue Account (HRA).
1.2	The stock consists of a mixture of bungalows, flats and houses and includes 13 Retired Living Schemes, one block over 18m tall and a number of properties used as Temporary Accommodation for homelessness under s188 and s193(2) of the Housing Act 1996.
1.3	There are also some commercial units and some units, which are leased to other providers.
1.4	Prior to East Suffolk Council being created, only Waveney District Council had retained its housing stock. Suffolk Coastal District Council had transferred its properties to a Registered Provider a number of years before. Therefore, the stock is predominantly located in the North of East Suffolk.
1.5	Local authorities with social housing stock became "registered providers of social housing" pursuant to the Housing and Regeneration Act 2008. However, local authority registered providers were not subject to any of the economic standards set by the RSH until they became subject to the Rent Standard with effect from 1 April 2020.
1.6	Registered Providers of social housing, which includes both Councils and Housing Associations, are governed by the Regulator of Social Housing (RSH).
1.7	The Housing and Regeneration Act 2008, sets out the role of the RSH.
1.8	The RSH has a set of standards, which Registered Provider (RP) landlords, must comply with. These include 3 economic and 4 consumer standards. The consumer standards are applicable to all RP's, including Councils. Not all the economic standards apply to Councils, because the RSH does not have the power to impose them on Local Authorities. The only economic standard, for which Councils must comply with, is the Rent Standard.
1.9	The RSH has a 'co-regulatory' approach to supporting the regulation of social housing. There is an expectation that RPs are open and transparent and will make a self-referral to the RSH if there is reason to believe that there may be a breach of one or more of the Regulatory Standards.
1.10	<p>The Current Consumer Standards are:</p> <p>The Tenant Involvement and Empowerment Strategy – Customer Service, Choice, Complaints, Involvement and Empowerment and ensuring there is an understanding of the diverse needs of tenants.</p> <p>The Home Standard – Quality of accommodation, repairs and maintenance. This includes compliance with the 'Big 6' areas: Fire, Gas Safety, Electrical Safety, Water Safety (Legionella), Asbestos and Lifting Equipment (Lifts and Stairlifts).</p> <p>The Tenancy Standard – Allocations, Mutual Exchanges and Tenancy Management</p> <p>The Neighbourhood and Community Standard – Management of neighbourhoods and anti-social behaviour.</p> <p>The RSH is currently consulting on new proposed Consumer Standards, to align with the requirements of the Social Housing Regulation Act, which will be enacted in April 2024.</p>

1.11	<p>The key outcomes of the Home Standard are summarised below:</p> <ul style="list-style-type: none"> • Ensure council homes meet the Decent Home Standard and are maintained to this standard, • Provide a cost-effective repairs and maintenance service to homes and communal areas that responds to the needs of, and offers choice to tenants, and has the objective of completing repairs and improvements right first time, • Meet all applicable statutory requirements that provide for the health and safety of occupants in their homes.
1.12	<p>The Rent Standard applies, (subject to certain exceptions) to 'low-cost rental accommodation', as defined by section 69 of the Housing and Regeneration Act 2008 with some limited exceptions (not relevant to this paper). This includes some types of Temporary Accommodation, which is used for those owed a duty under homelessness.</p>
1.13	<p>Registered providers must comply in full, with all the requirements and expectations set out in the Rent Standard. They must additionally comply with all the requirements and expectations of the Rent Policy Statement on the setting, increase and decrease of rents and service charges.</p>
1.14	<p>An initial high-level review of the Council's landlord service was conducted by the newly appointed Head of Housing at the end of 2021. This identified some areas, which may have constituted a breach of the Regulatory Standards.</p>
1.15	<p>On 9th February 2022, an initial letter was sent to the RSH setting out the reasons why the Council felt it was not compliant with the Home and Rent Standard.</p>
1.16	<p>A letter was sent to all tenants to advise them of the self-referral to the RSH and set out the reasons why.</p>
1.17	<p>On 10th March 2022, a further letter was sent to the RSH providing further details of the potential breaches of the Home Standard and to advise them of the work ESC was undertaking to try and remedy potential breaches of both the Home and Rent Standard.</p>
1.18	<p>On 25th May 2022, the RSH issued a Regulatory Notice, which stated that:</p>
1.19	<p><i>"a) East Suffolk Council had breached part 1.2 of the Home Standard; and as a consequence of this breach, there was the potential for serious detriment to the council's tenants."</i></p>
1.20	<p><i>"b) East Suffolk Council was not compliant with the legislative requirements of the Welfare Reform and Work Act 2016 (the Act). Since 2016, it charged inaccurate rents as a result of incorrectly applying additional service/de-pooled rent charges to the majority of its stock, which should have been included in the rent. It then subsequently did not apply the 1% rent reduction to these additional rental charges, also in contravention of the Act."</i></p>
1.21	<p><i>"c) East Suffolk converted more than 1,000 properties to Affordable Rent without the requisite permissions, in contravention of one or other of the Act and the Rent Standard (dependent upon the date of the conversion)."</i></p>
1.22	<p>The Notice also stated that <i>'Complying with statutory health and safety requirements is a fundamental responsibility of all registered providers because of the potential for serious harm to tenants. Taking into account the seriousness and breadth of the issues, the durations for which tenants were potentially exposed to risk, and the number of tenants potentially affected, the regulator has concluded that it is proportionate to find that East Suffolk Council has breached the Home Standard and that there was a risk of serious detriment to tenants during this</i></p>

	<i>period. East Suffolk Council has demonstrated to the regulator that it understands the work it needs to undertake to ensure that it completes the required statutory checks and relevant safety actions, and the regulator will work with the council as it delivers this programme.'</i>
1.23	Following their investigation and the issuing of the Regulatory Notice, the RSH also said in the notice: <i>'East Suffolk Council is putting in place a programme to rectify these failures and the regulator will therefore not take statutory action at this stage, as it has assurance that the breach of the standards is being remedied. The regulator will work with East Suffolk Council as it continues to address the issues which have led to this situation, including ongoing monitoring of how it delivers its programme.'</i>
1.24	Since the Regulatory Notice was issued, a significant programme of improvement has been undertaken, as set out, in detail in the Report , which was presented to Council in January 2023.

2 Current position

Asset Compliance																	
2.1	<p>At, 30th November 2023, the compliance levels were:</p> <table border="1"> <thead> <tr> <th>Aspect of Compliance</th> <th>Level of Compliance</th> </tr> </thead> <tbody> <tr> <td>Asbestos Safety- communal areas</td> <td>100%</td> </tr> <tr> <td>Electrical Safety-domestic</td> <td>99.11%</td> </tr> <tr> <td>Electrical Safety- communal</td> <td>100%</td> </tr> <tr> <td>Fire Risk Assessments in date</td> <td>100%</td> </tr> <tr> <td>Gas Safety</td> <td>99.98%</td> </tr> <tr> <td>Passenger Lift Safety</td> <td>100%</td> </tr> <tr> <td>Water Safety</td> <td>100%</td> </tr> </tbody> </table> <p>This data is reviewed monthly by the Housing Health & Safety Board.</p>	Aspect of Compliance	Level of Compliance	Asbestos Safety- communal areas	100%	Electrical Safety-domestic	99.11%	Electrical Safety- communal	100%	Fire Risk Assessments in date	100%	Gas Safety	99.98%	Passenger Lift Safety	100%	Water Safety	100%
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Fire Risk Assessments in date	100%																
Gas Safety	99.98%																
Passenger Lift Safety	100%																
Water Safety	100%																
2.2	<p>Asbestos Safety – (1st September -30th November)</p> <ul style="list-style-type: none"> • Management Surveys to 267 communal block areas and 54 on-block garages have now been completed. • Management surveys have been completed to 203 of the 431 residential dwellings in Beccles. The whole programme is expected to complete in January 2024. • The next phase of 286 dwellings in Bungay is now being planned and is anticipated to commence in February 2024. • Following a robust procurement process, a new asbestos removal contract has been selected. The contractor is due to mobilise in early 2024 subject to formal contract award. The new contract has defined response times and monthly key performance indicators which will improve oversight of the contractor's delivery of the work. 																

2.3	<p>Electrical Safety</p> <p>There are 4407 dwellings which require an EICR and 71 communal areas.</p> <p>In anticipation of the legislation change requiring Social Housing providers to carry out a domestic Electrical Inspection Condition Report (EICR) every 5 years (currently 10 years), we continue to pursue a 5 year cycle.</p> <p>Over the last quarter progress has been made in reducing the number of homes who have not had an electrical inspection in over 10 years, and by the end of November only 7 tenants had repeatedly refused access for the safety inspection.</p> <p>39 homes had a safety inspection which was greater than 5 years old but less than 10 years, again all these tenants had refused access. All communal area EICRs are in date.</p> <p>Carbon monoxide detectors are installed in 3,416 domestic properties. We have not been able to access 241 dwellings to complete the programme. The contractor has been making appointments during November and after these attempts have concluded any remaining installs will be carried out by the gas servicing contractor as part of the annual service.</p>
2.4	<p>Fire Safety</p> <p>A Fire Risk Assessment (FRA) has been carried out to all 86 buildings which fall in scope of the Regulatory Reform (Fire Safety) Order 2005.</p> <p>The portfolio overall risk rating resulting from the assessments is: Substantial- 1 (Amy Court) Moderate- 45 buildings Tolerable- 40 buildings</p> <p>We have experienced significant quality issues and programme delays from one of the fire stopping contractors. As a result, when their current works are complete the decision has been made to award them no further work.</p> <p>Planning has begun to procure a new contract for fire stopping and replacement fire doors with the focus being on suppliers who are able to demonstrate their works are substantively delivered by a direct employed workforce.</p> <p>Fire detection systems are now complete at Amy Court and Wesley Court with works nearing completion at Harry Chamberlain Court. The next phase of fire detection upgrades to the retired living portfolio is underway with tenders due to go out early in 2024.</p> <p>We have completed the communal fire door replacement works and the fire stopping at St Peters Court. The FRA undertaken on 20th September 2023 has downgraded the overall risk for the building from substantial to moderate. Following the decision to decant the building 33 flats are now decanted.</p>

	<p>Currently the only active enforcement notices from Suffolk Fire and Rescue Service relate to:</p> <ul style="list-style-type: none"> • St Peters Court due to expire in Oct 24 • Harry Chamberlain Court due to expire 15th January 2024. <p>FRAs have generated 408 remedial actions, 30 of these remain in date with 378 overdue. As stated above procurement work is underway to ensure new contractors for these works have sufficient capacity and can deliver the work to the required quality.</p>
2.5	<p>Gas Safety</p> <p>We have 3697 domestic gas appliances that require a Landlord Gas Safety Record (LGSR) and we only have 1 out of date at the end of November 2023, due to the tenant refusing entry for the inspection to be completed. We are now following our legal process, to gain entry.</p> <p>We have 18 commercial gas appliances that require an LGSR, and all are in date.</p> <p>There are 37 dwellings where the gas supply has been ‘capped’. This results in the gas supply being isolated at the meter. 14 have been capped during 2023, with the longest capped service being 2008. The Contracts Manager responsible for heating is liaising with Housing Management and the Financial Inclusion Team to see what support can be provided to the tenants on suitable forms of heating.</p> <p>We are in the process of procuring and mobilising a new gas servicing contract with Eastern Procurement and Gasway. This is progressing well and will commence in January 2024.</p>
2.6	<p>Lift Safety</p> <p>Within ESC blocks there are 12 passenger lifts, all are serviced monthly and have an inspection carried out to the LOLER (Lifting Operations and Lifting Equipment Regulations 1998) specification twice a year, all of which are in date.</p>
2.7	<p>Water Safety</p> <p>There is a requirement within our blocks where there are communal water supplies, such as our Retired Living Schemes, to have ‘Water Risk Assessments’ completed.</p> <p>We are currently required to complete 15 Water Risk Assessments on a two-year cycle. All sites have been surveyed and we are due to start carrying out new risk assessments from March 2024.</p> <p>The water supply tank on the 16th floor of St Peters Court has been cleaned, disinfected and flushed during November.</p> <p>During routine testing at St Peters Court trace levels of Coliform bacteria were identified on 12th September, tenants were provided with bottled water until further tests were able to confirm the water supply was safe. This highlighted the benefits of routine testing and emergency procedures to supply bottled water at short notice to multiple households.</p>

Rents	
2.8	<p>A financial, forensic audit of rent accounts has been undertaken by an independent 3rd party (David Tolson Partnership) and completed in June 2023.</p> <p>This audit reviewed 9,280 tenancies, covering the 13 financial years between April 2010 to March 2023.</p>
2.9	<p>During the financial audit, DTP provided additional support including:</p> <ul style="list-style-type: none"> • Review of any advice and guidance relating to rent setting and service charges, which East Suffolk has acquired following the initial review and taking this into account in the forensic exercise. • Review of any additional data sources available to East Suffolk which did not form part of the initial review. • Calculation of Social Housing Formula Rents, including a review of any tenancy changes and legal action and identifying any over- or under-charging and recommending any remedial rent and tenancy management activity. • Identifying any other related issues and escalating them for attention
2.10	<p>The audit has confirmed that 11.7% of tenancies are not affected by incorrect affordable rent and/or incorrect charges for maintenance of heating systems.</p>
2.11	<p>The audit reviewed all tenancies paying an Affordable Rent and identified those tenancies which had been incorrectly converted from a Social Rent.</p> <ul style="list-style-type: none"> • Affected tenancies were re-set to a Social Rent from the start of the tenancy. • The Rent overpaid by the Tenant was calculated for refunding to the Tenant. <p>The total value of rent over-payments over 8 years is £4,181,963</p> <p>The audit has confirmed that 22% of all tenancies were impacted by incorrect rents being levied. Of these, 13% are current tenants and 9% are former tenants.</p>
2.12	<p>It was agreed at Full Council in January 2023, that properties previously converted from Social to Affordable Rent would have their rent re-set back to Formula Rent plus rent flexibility. This was completed at the start of the new Financial Year, in April 2023.</p> <p>Under government rent policy rent flexibility allows rent to be set up to 5% above formula rent for general needs tenants and 10% above formula rent for tenants in retired living schemes.</p>

2.13	<p>The audit reviewed all tenancies which had incorrectly paid charges for maintenance of heating systems. These charges were incorrectly made as a service charge or, since 2018, as a de-pooled rent charge.</p> <ul style="list-style-type: none"> • The incorrect charges were terminated on all rent accounts • The charges overpaid by the Tenant was calculated for refunding to the Tenant <p>The total value of charges overpaid by Tenants over 13 years is £ 4,511,810</p> <p>84% of all tenancies were impacted by incorrect service (heating) charges being levied. Of these, 38% are current tenants and 46% are former tenants. All of these errors affect Social Rented properties only, there are no incorrect charges levied against Affordable Rented properties. This was expected, as you cannot charge service charges on Affordable Rented properties.</p>
2.14	<p>As part of the financial audit, accounts have been reviewed to identify where there is either current or historical housing benefit claims, associated with the account. The audit has identified 74% of tenancies has a record of being in receipt of housing benefit, at some point during the tenancy.</p>
2.15	<p>Tenants in receipt of Housing Benefit who have overpaid rent and/or a service charge will have been paid too much housing benefit. This HB overpayment will be 'clawed back' from tenants during the correction procedures.</p> <p>It will be necessary for ARP to re-calculate every single housing benefit claim between April 2013 and March 2023. This work will be completed in LIVE Housing and ARP IT systems on 8th January 2024.</p> <p>We estimate the value of the refund to Housing Benefit will be around £3,513,950. The exact final figure will be confirmed on 08/01/2024 when the data is corrected in our Live systems.</p>
2.16	<p>It was agreed at Full Council in January 2023 that tenant arrears will be paid before any refunds arising from historical errors are paid out to tenants. The value of tenant arrears owed to the Council on 12.11.23 was £1,554,343. Accordingly, the HRA will receive receipts with a value in the region of £1,554,34 over the next few months as tenant arrears are cleared down.</p> <p>Tenants are required to pay their rent one week in advance (low-cost rental accommodation) and this is a condition of their tenancy agreement. Over time, many tenants revert to paying in arrears. The refunds financial process will retain funds on the rent account so all affected tenants are 'moved' to a financial position of one week rent in advance.</p> <p>The refund process includes a 'case management' step that will make these changes to rent accounts</p>

2.17 In summary the following financial outcomes will be delivered:

<u>Over-payments</u>		£
Rent overpaid	£4,181,963.79	
Charges for heating system maintenance	£4,511,810.98	
Credit balance due to tenants	£8,693,774.77	

<u>Credit Balance Deductions</u>		£
Housing Benefit clawback (est. 12.11.23)	£3,513,950.50	
Clear current tenant arrears (12.11.23)	£812,889.60	
Clear former tenant arrears (12.11.23)	£632,453.68	
Clear debt written-off	£109,000.00	
Credit Balance due to Tenants	£3,625,480.99	

<u>HRA receipts</u>		
Clear current tenant arrears (12.11.23)	£812,889.60	
Clear former tenant arrears (12.11.23)	£632,453.68	
Clear debt written-off	£109,000.00	
HRA receipts	£1,554,343.28	

2.18 In addition to the initial refunds of £8,693,774, there will also be an effect on the HRA Business Plan, due to a reduction in income. Income has been reduced in each future financial year as part of our business plan modelling and including the initial refund levels, the impact on the HRA Business Plan over the rest of its 30-year term is over £28.2M.

2.19 An extensive piece of work has been undertaken, to assure data quality and design and implement data tools and business processes to ensure the refunds can be administered correctly and as quick as practicably possible. ESC has recruited 3 additional full time Rents Officers to support the increased workload of refunding monies to Tenants.

2.20 3,602 people have had multiple tenancies during this time, and the remaining people have only had 1 tenancy. When we write to each tenant, we will include a breakdown of all tenancies held and the amount of refund owed for each one.

Tenants	Count
Tenants with 2 tenancies	2708
Tenants with 3 tenancies	656
Tenants with 4 tenancies	164

Tenants with 5 tenancies	60
Tenants with 6 tenancies	6
Tenants with 7 tenancies	0
Tenants with 8 tenancies	8

2.21 The **9,280** tenancies have been organized into 7 Cohorts and refunds will be processed in this sequence:

<u>Cohort</u>	<u>Description</u>	<u>No of tenancies</u>	<u>Total Value of Refunds £</u>
A	Tenancies NOT affected	1,085	0.00
B	Current tenancies with no history of Housing Benefit	1,115	£2,011,240.61
C	Tenancies with HB history and refunds of >£5k	181	£721,296.94
D	Current tenants with court action on hold	28	£37,293.78
E	Current tenancies with HB history and refunds <£5k	2,999	£3,698,954.96
F	Former tenancies with no history of Housing Benefit	1,457	£700,742.10
G	Former tenancies with HB history and refunds <£5k	2,415	£1,524,246.38
Total		9,280	£8,693,774.77

Project plans indicate that all tenancies relating to current tenants will have been completed by end March 2024.

In principle all former tenancies could be complete by July 2024, but we anticipate we may have lost contact with some former tenants and may need to undertake extra activities to locate these individuals eg use of a tracing service.

2.22 Work started on the refund process in November and case management and tenant letters have been completed as follows:

<u>Cohort</u>	<u>Description</u>	<u>No of tenancies</u>	<u>Total Value of Refunds £</u>
A	Tenancies NOT affected	540	0.00
B	Current tenancies with no history of Housing Benefit	219	267,589.99
C	Tenancies with HB history and refunds of >£5k (current and former tenants)		
D	Current tenants with court action on hold		
E	Current tenancies with HB history and refunds <£5k		
F	Former tenancies with no history of Housing Benefit		
G	Former tenancies with HB history and refunds <£5k		
Total		759	£267,589.99

2.23	In March 2023, Cabinet approved ESC’s first ever Rent and Service Charges Policy . This was a significant milestone in our approach to being compliant with the Rent Standard, as it sets out clearly our approach to rent and service charge setting.
Governance	
2.24	<p>Within the self-referral letter to the RSH, the Council committed to, amongst other things, an independent governance review, with the following Terms of Reference:</p> <ol style="list-style-type: none"> 1. Establish why there was a delay in ESC identifying and acting upon compliance breaches. 2. Consider the scope and sufficiency of changes made to ESC’s Housing management arrangements to address the concerns identified by David Tolson Partnership (DTP) consultancy in February 2022 and the Social Housing Regulator in May 2022. 3. Recommend any structural and/or cultural changes which could be made to ESC’s governance arrangements moving forward so that regulatory and statutory contraventions are, as far as reasonably possible, prevented from occurring and if/when they do occur, that they are identified and addressed at the earliest opportunity.
2.25	In August 2022, VWV LLP Solicitors were commissioned by the Head of Legal and Democratic Services and Monitoring Officer to carry out the independent governance review mentioned above.
2.26	The Report produced by VWV LLP has been considered by the Corporate Leadership Team. The report has made the following findings, in relation to the terms of reference set out as part of the review.
2.27	<p>Question 1: Why there was a delay in ESC identifying and acting upon compliance breaches?</p> <p><i>“It is clear is that human error was the fundamental reason for the Council’s failings in respect of its Housing Services. We note that the Covid-19 pandemic played some part in respect of the timeframe for responding to the breach. We can find no deliberate malice in any documentary evidence seen but we do see omission. Whether this was pure naivety as to the seriousness of the issues or hope that these problems would resolve themselves/be swept under the carpet and go away – serious errors of judgment were made. The recommendations in this report seek to minimise the possibility of this being able to happen again – accepting you can never fully eradicate risk when it comes to human error.”</i></p>
2.28	<p>Question 2: The scope and sufficiency of changes made to the Council’s Housing management arrangements to address the concerns identified by DTP consultancy in February 2022 and the Social Housing Regulator in May 2022.</p> <p><i>“All steps taken to identify and address Housing management issues, as endorsed by Full Council, are considered to be sufficient. This includes the extensive steps and work undertaken to fully identify each and every issue. The recommendations in this report aim to support and enhance ongoing work.”</i></p>

2.29	<p>Question 3: Recommending any structural and/or cultural changes which could be made to ESC's governance arrangements moving forward so that regulatory and statutory contraventions are, as far as reasonably possible, prevented from occurring and if/when they do occur, that they are identified and addressed at the earliest opportunity.</p> <p>The independent report contains ten recommendations that apply to the whole of the Council.</p>
2.30	<p>The Corporate Leadership Team has accepted the ten recommendations made and a full response to the recommendations can be found in the report, which was presented to Audit and Governance Committee on 10th July 2023.</p>

3 How to address current situation

3.1	Cabinet is asked to note the updates related to actions completed and planned, which are provided within report.
3.2	Cabinet will continue to be updated on a quarterly basis, until the Regulatory Notice has been withdrawn.

4 Reason/s for recommendation

4.1	Cabinet is provided with reassurance that officers are taking appropriate action to remedy the non-compliance with the Regulatory Standards.
4.2	Cabinet will continue to be provided with quarterly updates until the Regulatory Notice is withdrawn.

Appendices

Appendices:

None.

Background reference papers:

Date	Type	Available From
January 2023	Full Council Report on Housing Regulation. Appendices include the self-referral to the RSH.	Decision Details: Housing Regulation (cmis.uk.com)
July 2023	Audit and Governance Report on Housing Governance	Decision Details: _____ Housing Governance Review (cmis.uk.com)