

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



Members are invited to a **Meeting of the Cabinet** to be held in the Conference Room, Riverside, on **Tuesday**, **7 September 2021** at **6:30pm**

In order to comply with East Suffolk Council's coronavirus arrangements and guidance, the number of people at this meeting will have to be restricted to only those whose attendance is reasonably necessary.

Ordinarily, East Suffolk Council encourages members of the public to attend its meetings but on this occasion would encourage the public to watch the livestream, via the East Suffolk Council YouTube channel instead at https://youtu.be/hP42yVunNVs If you do believe it is necessary for you to be in attendance we encourage you to notify Democratic Services, by email to <u>democraticservices@eastsuffolk.gov.uk</u>, of your intention to do so no later than 12 noon on the working day before the meeting so that the meeting can be managed in a COVID secure way and the Team can endeavour to accommodate you and advise of the necessary health and safety precautions.

However, we are not able to guarantee you a space/seat and you are advised that it may be that, regrettably, we are not able to admit you to the meeting room.

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

3 Announcements

To receive any announcements.

4 Minutes

1 - 9

To confirm as a correct record the Minutes of the Meeting held on 13 July 2021

KEY DECISIONS

5 East Suffolk and Great Yarmouth City of Culture 2025 Bid ES/0864 10 - 32

Report of the Deputy Leader and Cabinet Member with responsibility for Economic Development, and the Cabinet Member with responsibility for Communities, Leisure and Tourism

6 East Suffolk Local Council Tax Reduction Scheme for 2022/23 33 - 43 ES/0862

Report of the Cabinet Member with responsibility for Resources

7Extension of East Suffolk Youth Employment Service ES/086544 - 53

Report of the Deputy Leader and Cabinet Member with responsibility for Economic Development, and the Cabinet Member with responsibility for Communities, Leisure and Tourism

8	Fleet De-Carbonisation - An Interim Solution ES/0866 Report of the Cabinet Member with responsibility for the Environment	54 - 66
9	Infrastructure Funding Statement 2020/21 and CIL Funding Bids ES/0867 Report of the Cabinet Member with responsibility for Planning and Coastal Management	67 - 186
10	Joint Coastal Projects Board ES/0869 Report of the Cabinet Member with responsibility for Planning and Coastal Management	187 - 203
	NON-KEY DECISIONS	
11	Adoption of Residential Development Brief for WLP2.14 Land North of Union Lane, Oulton Supplementary Planning Document ES/0868 Report of the Cabinet Member with responsibility for Planning and Coastal Management	204 - 394
12	First Light Festival 2022 ES/0870 Report of the Deputy Leader and Cabinet Member with responsibility for Economic Development, and the Cabinet Member with responsibility for Communities, Leisure and Tourism	395 - 404
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 Paragraph 3 of Part 1 of Schedule 12A of the Act.	
Part ⁻	Two – Exempt/Confidential	Pages
14	 Exempt Minutes 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.
 Information relating to the financial or business affairs of any particular
- person (including the authority holding that information).

Pages

15 Freeport East Outline Business Case

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

Close

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Stephen Baker, Chief Executive

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Minutes of a Meeting of the **Cabinet** held via Deben Conference Room, East Suffolk House, on **Tuesday, 13 July 2021** at **6:30 PM**

Members of the Cabinet present:

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

Other Members present:

Councillor Peter Byatt, Councillor Alison Cackett, Councillor Tony Cooper, Councillor Linda Coulam, Councillor Tracey Green, Councillor Mark Jepson, Councillor Caroline Topping, Councillor Steve Wiles

Officers present: Stephen Baker (Chief Executive), Kerry Blair (Head of Operations), Karen Cook (Democratic Services Manager), Mark Fisher (Procurement Manager), Matt Makin (Democratic Services Officer), Sue Meeken (Political Group Support Officer (Labour)), Brian Mew (Chief Finance Officer & Section 151 Officer), Agnes Ogundiran (Conservative Political Group Support Officer), Nicole Rickard (Head of Communities), Lorraine Rogers (Deputy Chief Finance Officer), Paul Wood (Head of Economic Development & Regeneration)

1 Announcements

The Leader referred to the commercial activity, creativity and innovation that was happening the length and breadth of East Suffolk, from Freeport East in the south through the Smart Towns Initiative on to the Major Town Investment Plan projects in Lowestoft. Tonight, the Leader stated, he wanted to announce something rather different that gave the opportunity to showcase another hugely important part of the East Suffolk community, the Cultural and Creative sector. Together with ESC's neighbours at Great Yarmouth Borough Council, it had been decided to enter a joint bid for UK City of Culture 2025. For many years towns and districts had looked on with envy as cities drew in significant investment and growth through the City of Culture Scheme. Through this scheme they had been able to highlight the diversity of culture available within their city limits, an opportunity that had erstwhile not been made available to East Suffolk.

The Leader stated that the Department for Digital, Culture, Media and Sport had recently announced that the UK City of Culture 2025 award was to be a catalyst for levelling up areas outside London and other UK cities, putting culture at the heart of

plans to recover from the impact of the pandemic.

This meant, for the first time, groups of towns could join together and apply for the title to be awarded to their local area, widening the scope of areas across the UK that could benefit and broadening its remit to encompass health and well-being, net zero communities, people and diversity.

UK City of Culture was a fantastic showcase of the huge impact culture had in towns and cities across the country, the Leader stated, and those entering would need to articulate a strong and unique vision for their future growth, celebrating local heritage and using culture to bring communities together, while building a sense of place and inspiring local pride.

The Leader reported that during the course of the past 18 months he and the Chief Executive had met with representatives of the amazing creative sector to hear how they had been coping with lockdown and to try to find ways to help them survive long periods of closure. This East Suffolk and Great Yarmouth bid had the potential to be transformational for the East Suffolk area, strengthening communities, building a sense of pride, celebrating and boosting the local arts and culture sector, and attracting new investment and tourism with all the benefits this economic uplift would bring. Working with the cultural and creative sector, from those of international renown in Snape and Aldeburgh to smaller but no less important contributors right across the district East Suffolk would create a groundswell of enthusiastic support and engagement which would in turn play a key role in efforts to overcome the challenges of low social mobility and disadvantage in the combined communities, helping them to recover from the effects of the pandemic and opening yet more opportunities, especially for young people.

At the moment, the Leader stated, he was at the stage of announcing the intention to bid, which would go public on 14 July 2021; there would be a lot of hard work ahead, but with many amazing opportunities and he felt that ESC had the very best partner possible in Great Yarmouth Borough Council who would share this journey. The Leader added that not only did the two authorities have a deep connection in their maritime heritage and close proximity, but they were also both going through a period of considerable change and regeneration as they worked towards securing a better future for their communities. They already collaborated on several important projects and they both believed that a wealth of benefits could come from putting culture at the very heart of everything they did, providing a catalyst for investment to drive their economic growth and regeneration. It could provide ambition for residents, inspire people and steer them towards engaging with others and creating positive pathways.

The Leader stated that both authorities were busy contacting key stakeholders and from the responses so far they were already confident their communities would be inspired at the prospect of playing their part in what would be a stimulating and exciting venture that would enable them to showcase to the rest of the UK and further afield the diverse, rich and multi-layered culture they treasured, their people and their creativity, experiences, buildings and landscapes, opening them up to be enjoyed and engaged with by everyone and creating a cultural legacy for future generations.

The Cabinet Member with responsibility for Community Health referred referred to the Prime Minister's recent announcement in respect of Covid and stated that although the

vaccination rollout had been a success, the pandemic was not over and cases continued to increase rapidly; as such, Councillor Rudd urged everybody to wear a face covering where appropriate, this she said would help everybody, protecting each other to stay safe. Councillor Rudd also reminded everybody to carry out lateral flow tests twice a week. Proceeding with caution and following the guidance was imperative she stated.

The Cabinet Member with responsibility for Resources announced the recent appointment of Christopher Bing to the post of Monitoring Officer and Head of legal and Democratic Services.

The Cabinet Member with responsibility for Housing announced the recent appointment of Heather Tucker to the post of Head of Housing.

2 Apologies for Absence

There were no apologies for absence.

3 Declarations of Interest

There were no declarations of interest.

4a Minutes - May 2021 RESOLVED

That the Minutes of the Meeting held on 4 May 2021 be agreed as a correct record and signed by the Chairman.

4b Minutes - June 2021 RESOLVED

That the Minutes of the Meeting held on 1 June 2021 be agreed as a correct record and signed by the Chairman.

5 East Suffolk Council Outturn Report 2020/21

Cabinet received report **ES/0825** by the Cabinet Member with responsibility for Resources, who stated that his report provided an overview of the Council's draft outturn position for 2020/2021 in respect of the General Fund, Reserves, Housing Revenue Account (HRA), the Capital Programme and the Collection Fund.

2020/2021 was, Councillor Cook reported, an unprecedented year, and the net budget impact of Covid-19 on the General Fund was forecast in the region of £8.6m, during the first quarter of the year. However, over the course of the last 12 months, there had been significant Government funding to support the Council's response to the pandemic and to lessen the impact on the Council's finances from additional cost pressures and loss of income. This was an area of significant uncertainty and fast moving developments, and was extremely difficult to forecast, especially the economic impact on Council income streams. As a result, the most significant variance from revised budget to actual was in relation to Covid, which had led to an outturn surplus for the General Fund of £1.1m. The proposal was for this balance to be transferred to the Transformation Reserve to provide funding for the delivery of the Council's Strategic Plan. As at 31 March 2021, Councillor Cook reported, the total on the Council's earmarked reserves stood at £73.8m. This was an increase of £27.3m on March 2020, arising from additional income from Business Rates and funding for Community Projects and Covid-19 which would be utilised in the current year. It was worth noting, Councillor Cook advised Cabinet, that £42.1m (57%) of the year-end balance was held across four earmarked reserves for Business Rates, Capital, Covid and Port Health.

The HRA reported a small outturn variance of £39k against the revised budget. The most significant variances to report were due to re-phasing of the Housing Development Programme. The General Fund Capital Programme reported a £5.05m underspend at the end of the year due to projects being re-phased to 21/22.

The outturn position would feed into the review and update of the Medium Term Financial Strategy, the Capital Programme and the HRA in the 22/23 budget process. Going forward, the Council was in a much stronger financial position than it expected 12 months ago.

Councillor Cook, in conclusion, referred to the financial support from the Government, which he said had been extensive; however, the prudent management of the support had been key in delivering this extremely welcome outcome; he referred to the most difficult financial circumstances one could imagine, and a very firm financial ethos being maintained. Councillor Cook, joined by all members, commended the outstanding work of the Financial Services Team.

The Leader also gave his thanks, not only to the Financial Services Team, but also to the Cabinet Member with responsibility for Resources; he referred to the excellent outturn report, and not taking that for granted, it was exceptional and would allow ESC to deliver against its ambitious agenda over the next 12 months, and beyond.

The Cabinet Member with responsibility for the Environment gave thanks for the hard work undertaken and stated that this would help the Environmental Team to implement policies going forward.

The Deputy Leader also gave his thanks and he referred to the Assets and Economic Development Teams being able to make acquisitions that had enabled further income to come into the Council. The Deputy Leader also referred to the grants that had been given and the speed at which the grants had been processed.

Councillor Byatt, after giving thanks for the excellent report, asked a number of questions; he asked how Council Tax and Business Rates arrears were affecting the Council; he also referred to the money that had been saved in travel costs and asked if some of the savings could be put towards additional electric charging points at the Council offices. Councillor Byatt also referred to income from the Port of Felixstowe and asked if the knock on effect of the shortage of lorry drivers affected the operations of Felixstowe and associated ESC income. Finally, Councillor Byatt referred to the bid of £5,000 for Member training, and slippage, and he asked about Member training in respect of new Planning arrangements.

In response to the questions asked by Councillor Byatt, Councillor Cook advised that he

would be presenting a report to Full Council which would cover Council Tax and Business Rates arrears, and he commented that no doubt the Cabinet Member with responsibility for the Environment, together with the Environment Task Group, would be considering additional electric charging points. Referring to the shortage of lorry drivers, Councillor Cook advised that, potentially, this would affect the transport industry and ESC would react accordingly. In conclusion, Councillor Cook acknowledged the importance of Member training and the investment of this. The Leader referred to one of the impacts of the exit from the EU, and the increase in work by Port Health, and he acknowledged that that came at a cost to the importers, hauliers, companies and central government; the Leader stated he too had concerns around the employment of drivers, and he also had concerns around general employment in a number of sectors. The Leader referred to all that ESC could do to promote people moving to, and coming to East Suffolk, to work, to live, and to resettle, would only be positive because with those people would come a workforce and that workforce would need homes and facilities etc.

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

RESOLVED

1. That the Council's draft outturn position for 2020/21 together with reserves and balances as at 31 March 2021 be noted.

2. That the transfers to and from reserves shown in Appendix C, including transfer of the £1.107m General Fund outturn surplus to the Transformation Reserve, be approved.

6 Review of Place-Based Initiatives

Cabinet received report **ES/0823** by the Deputy Leader and Cabinet Member with responsibility for Economic Development, and the Cabinet Member with responsibility for Communities, Leisure and Tourism, who reported that ESC had provided financial and staff support to Place-Based Initiatives (PBIs) for the past fifteen years, beginning with Felixstowe Futures in 2006. The existing funding agreements were due to expire at the end of December 2021 for the current initiatives in Felixstowe and Leiston. This presented an opportunity to review the Council's approach to supporting such initiatives, and place-based working more generally. The report set out the Council's current support for PBIs and their impact to date, outlined the wider context of ESC's place-based working and presented a range of options for Cabinet to consider on the Council's future support of such partnerships.

Whilst there were currently two clearly defined PBIs receiving a range of support from ESC, plus Lowestoft Rising which was a key multi-agency partnership in the district, the Council was also engaged in a much wider approach to place-specific working and the options presented in the report reflected that. Six options were presented and these ranged from the continuation of funding for some of the existing PBIs, expanding the number of PBIs based on strong evidence of need and opportunity, allowing areas to bid for place-based resources, establishing a team of Change Managers who would be deployed on a short-term basis, moving to a town centre manager model or to cease all funding of PBIs in December 2021.

The Deputy Leader referenced the many activities / achievements of Felixstowe Forward, ie engagement events, securing external funding, completion of the Felixstowe Seafront Garden project etc; it had also enabled the way for new initiatives such as the Landguard Partnership and Felixstowe Bid.

The Cabinet Member with responsibility for Communities, Leisure and Tourism referenced the work of Leiston Together, which had worked on a Strategic Plan, looking at activities to do with Destination Leiston, Leiston People, Leiston Means Business, Leiston Future, Digital Leiston and Greener Leiston, commenting that they had been hugely beneficial to the communities around Leiston and surrounding villages. Turning to Lowestoft Rising, Councillor Smith reported that it had been supporting regeneration in Lowestoft and had also been hugely successful.

Both Councillor Jepson and Councillor Wiles commented on the excellent work and achievements of Felixstowe Forward, commenting how, over recent years, the brief and focus had shifted to that of an enabling role. Councillor Jepson and Councillor Wiles commented on the excellent work undertaken by Helen Greengrass and gave thanks for that.

Councillor Cooper commented on the excellent work of Leiston Together, and particularly how it had brought many groups / organisations together.

The Cabinet Member with responsibility for Housing, referring to Felixstowe Forward, commented that he had been involved at the early stages of the project, back in 2006; he applauded the work of everybody involved.

Following a question from Councillor Byatt, the Deputy Leader commented that putting the four Change Managers in place, and being able to move them around the district as required, would not reduce significantly the capacity in Lowestoft and Leiston.

The Leader stated that the placed-based initiatives had been fantastic and continued to deliver; however, he added that if that model continued, other towns, ie Framlingham, Saxmundham, Woodbridge, Halesworth, would suffer. By introducing the Change Managers, who would have a much wider remit, the whole of the District would be supported.

The Leader gave his personal thanks to Helen Greengrass, and the Felixstowe Forward Team, who he said had carried out remarkable work.

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

RESOLVED

 That the continuation of funding for Lowestoft Rising for a further three years from New Homes Bonus at a total cost of £60,000 or £20,000 per annum be approved.
 That the implementation of option 4 i.e. establish a small team of East Suffolk Council Change Managers to be deployed where there are short or mediumterm needs identified be approved.

3. That the extension of East Suffolk Council's financial support for Leiston Together by one year until December 2022 be approved.

4. That a budget of £421k over two years from January 2022 to deliver option 4, provide an operational budget for this option and to cover the extension to the Leiston Together funding agreement be approved.

5. That this budget be funded from the Business Rates Equalisation Reserve, with this reserve being subsequently replenished from additional funds arising from the Suffolk Business Rates Pool in respect of the Suffolk Public Sector Leaders' pot.

7 Results of the Task and Finish Group on Procurement

Cabinet received report **ES/0824** by the Assistant Cabinet Member with responsibility for Economic Development, the purpose of which was to inform members of the findings of the Task and Finish Group and agree the recommendations set out in the Procurement Strategy Document. The Assistant Cabinet Member reminded members that during the summer of 2020 a motion was raised at a meeting of ESC's Full Council regarding how the Authority procured goods, works and services. In response to the motion a cross-party task and finish group was commissioned and met regularly, and reviewed several areas, including social value models and how they can be used to understand the impact of the Council's spending; the main features of The Preston Model; current procurement practises at ESC, legislation relating to procurement, and potential changes in legislation currently undergoing consultation.

It was identified that despite pockets of good practice, current processes did not go far enough and an East Suffolk model of procurement was required. The Task and Finish Group therefore identified four themes which which the requirements set out within the motion could be met. These were supporting the local economy; measuring outcomes; partners; and East Suffolk commissioning. The Task and Finish Group focussed on developing a new East Suffolk model to deliver an updated strategy for procurement that would deliver on several important aspirations of ESC.

Councillor Wiles, in conclusion, thanked all members of the Task and Finish Group for their focus and hard work.

The Leader, after stating the importance of the work, also thanked members and officers for their work. The Leader referred to the importance of money, but he also highlighted the need to sometimes consider social values, longevity etc.

The Deputy Leader also gave thanks for the work undertaken, referring in particular to the work of his Assistant Cabinet Member.

Councillor Byatt commented that he was delighted to have been a member of the Task and Finish Group; he referred to the recommendations within the report and commented that they would have a permanent effect on the way that ESC would do some of its business.

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

RESOLVED

That the recommendations of the Member and Officer based Task and Finish Group be approved, which are:

1) Approving the action plan and outcomes in the Task and Finish Group Report (Appendix 1).

2) Creating a cross departmental project – to include consultation with members - to produce:

a) Revised procurement processes that support the new policy;

b) a Social Value and Sustainable Procurement Policy linked to the StrategicPlan to embed social value as a keystone to all council activity; andc) implement the action plan.

3) That as part of the work of the project group, a social value calculator tool is identified and purchased to inform decision making, with a maximum budget of £50k.
4) That East Suffolk Council commissions work from the East of England Local Government Association to carry out a review of procurement processes, and a 'health check' to identify any changes that need to be made to implement the new policy.

8 Exempt/Confidential Items

The Leader stated that in exceptional circumstances, the Council may, by law, exclude members of the public from all, or part of, an executive decision-making meeting. The Council should, unless there were urgent circumstances, give notice of its intention to do so via the Forward Plan, which was updated and published on its website 28 clear days prior to the meeting.

There were various reasons that the Council, on occasions, had to do this and examples were because a report contained information relating to an individual, information relating to the financial or business affairs of a particular person, or information relating to any consultations or negotiations.

Tonight, the Leader stated, Cabinet would be considering two substantive exempt matters which were outlined in agenda items 10 and 11 on the published agenda. Firstly, Waterlane Leisure Centre Roof Replacement, asked Cabinet to consider approval for funding from the Capital Programme to undertake refurbishment work to replace one of the roof areas and repairs to a second section at the Waterlane Leisure Centre, both areas were leaking and had reached end of life. If approved the investment would continue to provide a welcoming environment to the Council's leisure centres to provide the opportunity for everyone to lead a healthy and active life. By continuing to invest in ESC's buildings, the Leader stated, ESC was making the best use of its assets, ensuring that they continued to provide quality facilities across the district, were efficient and maximised the benefits for communities. ESC was delivering a redevelopment programme for its leisure assets to ensure they provided quality facilities for the community, that they were well maintained and became more financially sustainable. Secondly, the Leader reported, Review of Outsourcing Arrangements, Project Management Overview, asked Cabinet to consider a resourcing and transition plan for future operating arrangements.

RESOLVED

That, 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 involved the likely disclosure of exempt information as defined in Paragraphs 3 and 4 of Part 1 of Schedule 12A of the Act.

9a Exempt Minutes - May 2021

- 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.

9b Exempt Minutes - June 2021

- Information relating to any individual.
- Information that is likely to reveal the identity of an individual.
- 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.

10 Waterlane Leisure Centre Roof Replacement

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

11 Review of Outsourcing Arrangements - Project Management Overview

- 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.

The meeting concluded at 8:18pm

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Chairman

Agenda Item 5 ES/0864



CABINET

Tuesday, 07 September 2021

Subject	East Suffolk & Great Yarmouth City of Culture 2025 Bid
Report by	Cllr Craig Rivett, Deputy Leader and Cabinet Member with responsibility for Economic Development
	Cllr Letitia Smith, Cabinet Member with responsibility for Communities, Leisure and Tourism
Supporting Officer	Paul Wood Head of Economic Development & Regeneration Paul.wood@eastsuffolk.gov.uk 07798 797275

Is the report Open or Exempt? OPEN

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

Purpose and high-level overview

Purpose of Report:

To update Cabinet on ESC's joint bid with Great Yarmouth Borough Council (GYBC) for the City of Culture 2025 and secure a budget to support the bid to full submission should it be successful in being longlisted and shortlisted. The paper sets out the next steps following the submission of the expression of interest (EoI) in July 2021 and the resources required to progress to the next stage should the bid be longlisted in September.

Options:

- Cabinet approves a request of £100k to support the development of a full City of Culture application submission should the ESC/ GYBC bid be successful in being longlisted in September 2021. This will allow ESC and GYBC, who are making a similar financial request of their Cabinet, to develop a strong and compelling application to be the host area for the 2025 City of Culture.
- 2. Cabinet approves a smaller amount of funding which will only allow the bid partners to develop a more limited application with less ambition and therefore less likely to succeed in winning the bid.
- 3. Cabinet does not approve any additional funding which means the application will be very limited with no opportunity to engage external expertise to support the development of the full application/ programme. Partners would have to seriously consider whether there is any point in allocating significant officer time to such an application as the chances of success will be remote.

Recommendations:

- **1.** That Cabinet approve a budget of £100k to support the development of the City of Culture bid should it be longlisted.
- 2. That Cabinet approve the development of an East Suffolk Cultural Strategy regardless of the outcome of the City of Culture bid and the District seeks to deliver an ambitious cultural programme.

Corporate Impact Assessment

Governance:

The ES/ GY City of Culture Steering Group (Terms of Reference at appendix A) was established to direct the development of the expression of interest and associated engagement and communications strategy. If the bid is successful a board will be established with an independent, high profile chair and strong representation from the cultural/ creative and other key sectors in the two Districts. The purpose of the board will be to co-ordinate the development of the full City of Culture application which will need to be submitted in January 2022. It will be supported by a number of sub-groups reflecting the various sectors in the two districts which will be needed to develop an ambitious and compelling application. This will include the following sectors:

• Cultural and Creative

- Business sector
- Public sector
- Voluntary and Community sector

If the EoI is successful in being longlisted a bid/ delivery company will also be established probably in the form of a Community Interest Company, the board outlined above will guide the work of this company which will be accountable to the board. Any significant decision that has to be made by the two lead local authorities, i.e. ESC and GYBC will still be made by the respective Cabinets.

ESC policies and strategies that directly apply to the proposal:

East Suffolk Strategic Plan

East Suffolk Economic Growth Plan

East Suffolk Enabling Communities Strategy

Lowestoft Town Investment Plan

Lowestoft Cultural Strategy

Environmental:

No direct impact identified.

Equalities and Diversity:

An Equalities Impact Assessment has been undertaken which has resulted in the bid being positive for the majority of the protected characteristic group and neutral for the remainder.

Financial:

The paper is seeking approval for £100k funding to contribute to a £200k budget to support the development of the next phase of the bid. It is proposed that this funding will come from the New Homes Bonus (NHB) Reserve. ESC/ GYBC will also be making an application for funds from New Anglia LERP and if this is successful the amount of funding requited from ESC's NHB reserve will be reduced accordingly. If the EoI is longlisted ESC/GYBC will also receive £40k from DCMS to support the development of the full application. The draft budget is set out at Appendix A.

Human Resources:

Currently ESC is managing the development of the City of Culture bid within existing resources with support from an external consultant who is supporting both Councils. If our bid progresses to the next stage then additional human resources will be required to develop the full application – the additional funding being sought by both ESC and GYBC will support this.

ICT:

No direct impact identified

Legal:

A Memorandum of Understanding (MoU) has been agreed between ESC and GYBC and this sets out how the two Councils will work together to develop the City of Culture bid and how joint funding will be used. This also refers to the current governance structure set out above. If we proceed to the next phase this MoU will be updated accordingly.

Risk:

Within all competitive bids there is a risk of not being successful. We are aware that around 20 Eols have been submitted to DCMS in respect of the City of Culture bid and six will be longlisted in September – therefore this is a very competitive process. At this stage the two Councils have committed relatively modest amounts of expenditure to the bid, however if successful this will increase substantially and will require significantly more human resource. The risk is that this financial investment and time commitment results in an ultimately unsuccessful bid, however ESC is committed to ensuring that whatever the outcome there is a lasting legacy in the form of a district wide cultural strategy that aligns with the existing Lowestoft Cultural Strategy and an ambitious programme of cultural activities that reflects the importance of culture in supporting the delivery of the Council's strategic Plan.

There is a further reputational risk as the ESC/ GYBC bid has become high profile within the region and if it ultimately fails there is the potential for criticism around wasted resource. This can again be mitigated by committing to a strong cultural legacy regardless of the outcome of the bid through the development of an ambitious strategy and delivery programme.

External Consultees:The development of the Eol has involve and support from all sectors within the region. This includes key businesses, reg LEP, all the MPs covering the two District bodies and the community/ voluntary s heartening to see the high degree of su has received and this is demonstrated v received in support of the bid.
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Strategic Plan Priorities

Select the priorities of the <u>Strategic Plan</u> which are supported by this proposal: (Select only one primary and as many secondary as appropriate)		Primary priority	Secondar y priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk		\boxtimes
P02	Attract and stimulate inward investment		\boxtimes
P03	Maximise and grow the unique selling points of East Suffolk	\boxtimes	
P04	Business partnerships		\boxtimes
P05	Support and deliver infrastructure		
T02	Enabling our Communities		
P06	Community Partnerships		\boxtimes
P07	Taking positive action on what matters most		
P08	Maximising health, well-being and safety in our District		
P09	Community Pride		\boxtimes
T03	Maintaining Financial Sustainability		

P10	Organisational design and streamlining services		
P11	Making best use of and investing in our assets		
P12	Being commercially astute		
P13	Optimising our financial investments and grant opportunities		
P14	Review service delivery with partners		
т04	Delivering Digital Transformation		
P15	Digital by default		
P16	Lean and efficient streamlined services		
P17	Effective use of data		
P18	Skills and training		
P19	District-wide digital infrastructure		
T05	Caring for our Environment		
P20	Lead by example		
P21	Minimise waste, reuse materials, increase recycling		
P22	Renewable energy		
P23	Protection, education and influence		
XXX	Governance		
XXX	How ESC governs itself as an authority		
Users de se abie une se sel como estate e unionities este de 2			

How does this proposal support the priorities selected?

T01 – Growing our Economy

P01: Build the right environment for East Suffolk – the development of a full application and ultimate success in the UK City of Culture competition will provide a huge boost to the local cultural and creative sector. It will result in millions of pounds of investment that will benefit the whole economy. Even if the bid is unsuccessful ESC are committing to develop an ES Cultural Strategy and ambitious delivery programme which will drive inclusive growth and enhance the already strong cultural sector which exists within the district.

PO2: Attract and stimulate inward investment – Securing City of Culture status will provide international profile for the ES/ GY area and result in significant inward investment both directly within the cultural and creative sectors but also within the wider economy because of the exposure the area will receive and the amount of public and private investment that is being made.

PO3: Maximise and grow the unique selling points of East Suffolk – East Suffolk's cultural strengths are already a significant economic driver for the District from the internationally significant events that take place at Snape Maltings and Latitude to the diverse community based cultural activities taking place in Lowestoft. The high quality of our natural and built environment also creates a strong cultural sector. Achieving City of Culture status will massively enhance this on a national and international stage.

P04: Business partnerships – the delivery of City of Culture programme will require a massive partnership effort across the two districts. The business sector will be a key player in the development of these partnerships including the big blue-chip companies on our patch but just as importantly the support from the extensive SME sector. This will involve enhancing existing business partnership and also developing new ones to specifically support and deliver certain elements of the City of Culture programme.

T02 – Enabling our Communities

P06: Community Partnerships – the delivery of the full application and City of Culture programme will rely on developing strong partnership with local community groups. The bid programme will be 'bottom up' since this is the only way it will deliver the inclusive growth ambitions which will be of benefit to all ES communities.

P09: Community Pride – achieving City of Culture status will provide a once in a lifetime opportunity to show off what is great about East Suffolk on an international stage. A whole year of cultural activities taking place within our communities and directly involving these communities will engender such pride and provide a positive legacy well beyond the City of Culture year.

Background and Justification for Recommendation

1 Background facts

1.1 In June 2021 ESC and GYBC took the decision to submit a joint Expression of Interest (Eol) in respect of the City of Culture 2025 competition. The Department for Digital, Culture, Media, and Sport (DCMS) has for the first time have opened City of Culture to towns, counties, and districts. The UK City of Culture is run in a four year cycle, and the first place to receive the accolade was Derry-Londonderry in 2013, followed by Hull in 2017 and Coventry in 2021. The City of Culture is transformational, and the 2021 competition for 2025 status is an opportunity for places to put culture and creativity at the heart of their COVID 19 recovery and growth plans. The City of Culture can provide a driver for sustainable change, to build stronger communities and to attract investment. In Hull, more than 5.3 million people, 90% of Hull's residents attended at least one of the 2,800 City of Culture events and was responsible for at least £89.3m investment and an increase to tourism of nearly 10%.

The basis of our bid is the shared opportunities and challenges which exist within the two Council areas and the particular focus both areas have had recently on pursuing ambitious cultural regeneration programmes to drive inclusive growth. The towns of Great Yarmouth and Lowestoft in particular, have a shared heritage inextricably linked to the sea and both areas are now realising huge new opportunities through innovation in offshore energy. The City of Culture bid also represents a natural progression to the successful Making Waves Together project which both Councils invested in and delivered.

Within our wider areas there is a broader and deeper cultural offer linked to the high quality of our natural and built environments, world class performing arts and globally recognised innovation and technology. We have a compelling proposition to deliver an ambitious and unique City of Culture programme that will directly address the levelling up agenda, innovation and inclusivity.

The two partners have established a City of Culture Project Steering Group which is the decision-making forum on all aspects bid development. At each stage of the bidding process (stages outlined below), the Steering Group will consider the role, structure and membership to ensure the group remains fit for purpose.

Bid stages for the City of Culture 2025

- Expression of Interest deadline: 19 July 2021
- Announcement of longlist: early September 2021
- Announcement of shortlist: early 2022
- Visits to shortlisted places: March/April 2022
- Winner announced: May 2022

2 Current position

2.1 ESC and GYBC are currently awaiting the outcome of the recently submitted Eol with longlisted areas due to be announced in late September. The two Councils are now focussed on a high-profile engagement and communications strategy to raise awareness of the bid to ensure that as much profile as possible is generated ahead of the judging of the Eols.

An eight week engagement plan has been developed to set out how the profile of the bid will be raised during period up to shortlisting. This plan includes a follow up with the 120 cross sector organisations which provided letters of support for the bid, the creation of a video setting out the five themes of the bid and establishing a website and heavily promoting the bid through various social media channels.

The Steering Group has also produced a draft budget which sets out the resources required to further develop the bid to full submission should we be successful in being shortlisted. The overall budget identified is £200k which is based on the funding required on previously successful City of Culture applications. Both Councils are now seeking approval from their respective Cabinets for funding to establish this budget. A funding bid is also going to be made to New Anglia LEP for up to £80k and if successful this will reduce the financial request of each Council.

3 How to address current situation

3.1 Although the Council will not know the outcome of the EoI at the time of the September Cabinet meeting clearly, we have to prepare for all eventualities. If the bid is longlisted the bidding partners will need to move quickly to develop a full submission to meet January deadline for submission of the full application. This is the rationale for seeking agreement on additional funding at this point to ensure we are well prepared and positioned if the bid is longlisted.

Preparatory work is also taking place on developing a full governance structure (outlined in the Corporate Impact Assessment section above) which will support the development of the full application. This structure, similar to the proposed budget has been based on the experience of other areas that successfully competed for the UK City of Culture.

Clearly there is now a great deal of momentum behind the bid and since this is a highly competitive process there is chance of being unsuccessful. Both Councils

have already established ambitious cultural regeneration programmes and ESC is proposing that regardless of the outcome of the bid an East Suffolk Cultural Strategy is developed with an ambitious delivery programme that will support the realisation of the Council's Strategic Plan objectives, particularly around inclusive economic growth and enabling communities.

4 Reason/s for recommendation

4.1	In order to develop an ambitious and compelling full application with a serious
	chance of success, additional funding is required to develop the application. This
	funding will cover expenses such as consultancy support, appointment of a
	temporary Artistic Director, campaign collateral, project admin., development of a
	funding strategy, grants/ commissions to local community and arts groups to
	develop ideas and a contingency fund.

4.2 Securing UK City of Culture status would provide a massive boost to the East Suffolk/ Great Yarmouth area. It would result in millions of pounds of additional investment in the area, raise the profile of the area on an international stage and create a long lasting inclusive economic growth and community development legacy. This builds on the already ambitious cultural regeneration programmes both local authorities have previously developed jointly and are currently pursuing.

4.3	Regardless of the success of the Eol, ESC is proposing to develop an East Suffolk
	wide cultural strategy and associated delivery programme which will build on the
	work developed as part of the City of Culture bid. This is important since
	investment in the cultural sector will strongly support the delivery of the ES
	Strategic Plan objectives.

Appendices

Appendices	5:
Appendix A	Proposed City of Culture budget
Appendix B	City of Culture Steering Group Terms of Reference
Appendix C	City of Culture vision document
Appendix	City of Culture Expression of Interest
D	

Background reference papers:		
Date	Туре	Available From
12/08/21	Equality Impact Assessment	Paul Wood
	EQIA355834260	

Appendix A: City of Culture: next stage budget

ltem	Detail	Cost
	To provide 'exec director' services, to drive the	
Consultancy Support	programme and advise the structure and detailing of the bid - financial, governance etc.	£30,000
consultancy support		130,000
Artistic Director Role	Appoint to a temporary, part time role, from among the local sector leadership	£40,000
AI LISTIC DI ECTOI NOIE	-	140,000
	Budget for the above role to commission ideas / work on development	£15,000
Agonay Support	-	
Agency Support	Campaign collaterol - videos, website, social media	£15,000
	To keep diary and all the routine ticking over. Possibly	64.0.000
Project Admin	a secondment opportunity	£10,000
	For national / international experts to partner with us,	
Advisor / Partner Roles	for instance on the development of a diversity plan	£25,000
	An agreement with the university to develop some of	
Research	the research / partnerships	£5,000
Fundraising	A fundraising strategy will be key to credibility	£12,500
Grants / Commissions	Community / arts groups to develop ideas	£20,000
Contingency		£27,500
	Total	£200,000

Agenda Item 5 ES/0864



Great Yarmouth and East Suffolk

City of Culture Board

Terms of Reference

- 1. Role of the Great Yarmouth & East Suffolk City of Culture Board
- Oversee and direct the development of the UK City of Culture bid
- To receive associated plans, strategies, development proposals etc from officers, consultants and stakeholders for consideration and action
- Direct the associated marketing and communications strategy
- Direct the co-ordination of the stakeholder engagement strategy, ensuring we have a credible, influential and high-profile range of advocates who can promote our bid
- Approve the use of the CoC bid budget for the development of the full application
- Develop a funding strategy to support the development of the full application up to and beyond the longlisting phase
- Provide clear direction to external consultants who are supporting bid development
- Take reports and advice from the various sub-groups which support the Board

*Note: whilst the CoC Board is a decision-making body in respect of the development of the CoC bid, significant decisions which impact on the Councils will also need to be approved by the Council's respective democratic governance structures

2. Membership

The CoC Board will be chaired by an independent, high profile individual with links to the GY/ES area. Further representatives will come from the Councils and the four sub-groups established to advise the Board and support bid development.

At the Chair's discretion, a minimum of 2 individuals from each authority (2 officers) plus one SRO (5 representatives in total) are required to enable a Steering Group meeting to be held.

Membership of the CoC Project Steering Group is as follows:

- Paula Boyce (Strategic Director, GYBC Senior Responsible Officer)
- Andrew Jarvis (Strategic Director, ESC Senior Responsible Officer)
- Steve Miller (Director of Culture & Heritage, Head of Norfolk Museums Service, Head of Norfolk Arts Service Norfolk County Council)
- Jayne Knight (Arts Development Manager, Suffolk County Council)
- Michelle Burdett (Head of Inward Investment, GYBC)
- Paul Wood (Head of Economic Development & Regeneration, ESC)
- Darren Barker (Culture, Heritage and Design Manager, GYBC)
- Darren Newman (Economic Regeneration Manager, ESC)
- Helen Johnson (Culture & Heritage Programme Manager, ESC)
- Karla Supple (Communications Officer, ESC)
- Clare Dyble (Head of Comms and Marketing, GYBC)
- Judy Foster (Media and Comms Manager, GYBC)

Membership will be reviewed on an ongoing basis to reflect the priorities of the bid. Other Council officers, partners and stakeholders may be invited to attend on an ad hoc basis.

3. Budget (including decision making process for spend)

The Steering Group does not have any delegated authority to make decisions about budget. Budget proposals may be presented and considered, with any proposals being proposed at the two authority Boards and/or relevant decision-making committee/cabinet.

4. Meeting Arrangements

- Meetings will be held weekly and the frequency will be reviewed on an ongoing basis to reflect the needs of the bid.
- Agendas will be circulated at least one day ahead of the meeting
- Actions notes will be recorded from each meeting and circulated as soon as practicable after the meeting and ahead of the next meeting
- The meeting will be jointly chaired by the two Senior Responsible Officers (SROs) on a rotating basis
- The decision on the inclusion of new Project Steering Group members and ad hoc attendees will rest with the two SROs and will at a minimum be considered at the end of each bidding stage, or as and when required

5. Quorum

There must be a minimum of 5 members – one SRO and two officers from each authority.

6. Secretariat and Resource

The City of Culture steering group meeting will be administered by East Suffolk Council.

The terms of reference will be reviewed at the end of each bidding round stage at a minimum or more frequently as appropriate.



UK City of Culture 2025 Vision



Our key messages for our bid campaign centre around the unique and varied nature of our spectacular coastline with its ancient waterways and beautiful inland landscapes, our ecologically rich and diverse wildlife and the wide range of English seaside offerings from the beach huts and wild areas of the Suffolk and Norfolk coasts to the seafront splendours of our resorts.

The bid focuses on Great Yarmouth and Lowestoft and their hinterlands which have a long heritage of connections with the sea and the world beyond, and proud identities as thriving seaside destinations which are renewing themselves and their place in the world – in the renewable energy industry and as places of fertile creativity and cultural distinctiveness.

As we develop our programme, we will work with five themes to showcase our unique offering:







The irresistible pull... The sea made us, connected us, carried our influence around the world. It brought, and brings, people, cultures, ideas and energies to this most innovative, bold and welcoming place, and it is the focus of our next reinvention as the UK's leader in clean energy.



The silver darlings... So many of our stories are of migration: silver herring, people, birds. Great Yarmouth & Lowestoft were built on migrations of herring, and of people such as the Scottish herring girls, the first humans crossing Doggerland, communities welcomed from all over the world, links with partners across the North Sea and beyond.

The blue space... We will explore the healing power of water and the capacity of our landscapes for quiet, reflection and recovery with our health partners, from celebrations on water, at sea, in historic ports and tributaries that carried our forebears inland to places like Sutton Hoo; to waterways longer than Venice or Amsterdam, flotillas, regattas, community/artist boatbuilding, festivals of fire and light; and we welcome the sunrise before anywhere else in England.



The landscape that ate my heart... Our beaches and inspirational landscapes will be the great glories of 2025 – our sweeping coastline, land and water, our wildlife, and new opportunities to experience nature and culture as one. With Broads National Park, Suffolk Wildlife Trust and others, we will explore this in a physically present and digitally resonant way, as the galleries and halls for the work of contemporary artists, writers, composers, musicians, performers.



Listen to your heart and celebrate... Our towns are some of the great places of entertainment of the UK and our beaches the great playgrounds. Great Yarmouth is the home of circus and Lowestoft the spectacular celebration of First Light. Our programme will celebrate music, street performance, comedy, theatre – and our beaches will see events like no other in the country for scale and brilliance, befitting for the coast generating the UK's future energy!

It is central to our thinking that UK City of Culture should be about both the year

It is central to our thinking that UK City of Culture should be about both the year itself but also be profoundly transformational for our culture, our economy, our communities and our environment – and for our region generally – for many years thereafter. Hence, we are committed to an engaged and co-designed process with our communities as we develop our bid.

The Legacy...

Our cultural organisations want to be better recognised and celebrated locally, nationally and internationally, to have better resources to make great work, with resilience and the ability to plan long-term. There should be new opportunities for our own talented creatives to stay and work here successfully, particularly our young people, but also to welcome new creative businesses to the area.

Our venues and event promoters want to see a legacy of raised profile, improved infrastructure, market intelligence and position, combatting seasonality and increasing production capacity and audiences.

Our communities and residents demand sustained improvements in their lives and there is excitement about a legacy of 2025 that touches the challenges we face:

improving prosperity, creating new quality jobs, building confidence, resilience and health through engagement and improving our people's wellbeing.

We see a legacy for our environment – investment in and celebration of our journey to decarbonisation and sustainability, closer partnerships with our renewable energy sector to drive benefits to local organisations and people, increased sustainable tourism including to support the economic resilience of our environmental management organisations, and profound potential to change behaviours among both residents and visitors. We plan a legacy in which our towns are reimagined, better known, better understood and appreciated at home and beyond – preconceptions addressed and with a new pride and confidence in our future and that of our people.

Both our Councils are already currently committed to unprecedented investment in our infrastructure and cultural sectors - with Government investment of more than £63m across the two areas by Towns Fund, Heritage Action Zones and Future High Streets funding alone – and we start from our strength in staging large scale cultural events, and welcoming visitors. Our major events and festivals, organised by our award-winning cultural organisations, include the First Light Festival and Out There Arts, while our visitor economy welcomes more than 20 million visits a year with more than 7 million staying nights.

With our Bid area less than 90 minutes from London, our renewed train network (with its operator supporting our Bid) and with good access to a range of airports and sea routes, we are ready to attract millions of new people to explore and appreciate our culture in 2025.











1. Introduction

Our Bid extends across East Suffolk and Great Yarmouth Council areas - 70 miles of spectacular coastline connected by ancient waterways to inland landscapes of haunting beauty, ecologically rich and diverse with the largest areas reserved for wildlife in the UK.

As Dr Kathryn Ferry said "Over generations we've turned being by the sea into a cultural experience. This coast has all the archetypes of the great English seaside. From beach huts and wild landscapes of Suffolk and Norfolk coasts to seafront splendours of Great Yarmouth, it promises something for all ages and tastes".

Our bid focuses on our two great seaside towns, Great Yarmouth and Lowestoft and hinterlands. The area has a long heritage, millennia of connections with the sea and the world beyond - and proud identities as exemplars of the great British seaside – thriving destinations and diverse, innovative, modern places.

We offer a range and breadth of amazing places and attractions for all interests, the capacity to meet the dreams of many millions of new visitors and an unrivalled opportunity to connect our own communities, cultural organisations and businesses like never before.

Both towns are renewing themselves and their place in the world – in the renewable energy industry and as places of fertile creativity and cultural distinctiveness.

Both Councils are committed to unprecedented investment in our infrastructure and cultural sectors. The Government has awarded a total of more than £63m across the two areas by Towns Fund, Heritage Action Zones and Future High Streets funding alone.

We start from our strength in staging large scale cultural events, and welcoming visitors. Our major events and festivals, organised by our award-winning cultural organisations the First Light Festival and Out There Arts, inspire and entertain tens of thousands of people; our visitor economy welcomes more than 20 million visits a year – and more than 7 million staying nights.

Beyond the towns, we offer rich heritage and culture – natural and man-made; the Broads National Park and AONBs, but also great resources for STEAM business and innovation, for instance, BT's global R&D HQ Adastral Park, home to digital start-ups and breakthroughs such as in optical fibre.

With our Bid area less than 90 minutes from London, our renewed train network (with its operator supporting our Bid) and with good access to a range of airports and sea routes, we are ready to attract millions of new people to explore and appreciate our culture in 2025.

2. Who is involved?

Great Yarmouth borough Council, East Suffolk Council, together with Norfolk County Council and Suffolk County Council are leading the Bid. Our stakeholder map spans 180 organisations already involved – and the range and depth of support can be seen in our letters of support for partner and supporting organisations across the business, community and voluntary sectors, our health sector, police, academia, transport sector and arts, culture and heritage sector.

We have enthusiastic support of New Anglia LEP, both County Councils, Suffolk & Norfolk Chambers of Commerce, Norfolk Community Foundation, Suffolk Community Action, our four MPs, Universities of East Anglia and Suffolk and many others. Key partners will range across our artists and cultural organisations and partners in environment, education, research, business and health and disability sectors.

Our Arts Council England NPOs; Preservation Trust and Heritage Action Zones; Creative People and Places (Freshly Greated); Cultural Education Partnerships (Lowestoft Rising and Enjoy); Norfolk Museums Service and libraries will be at the heart of the bid.

We've engaged with the Broads Authority and the Wildlife Trusts, who have extensive reserves, access, engagement and education programmes in our area and with our own marine partners at the Centre for Environment, Fisheries and Aquaculture Science in Lowestoft.

A detailed Framework of Intent with UEA defines a key role, running major longitudinal programmes of evaluation, leading innovation and research programmes and joining with UK and international researchers and universities to explore ideas and challenges.

Some of our most enthusiastic development partners have been our health providers and community wellbeing organisations, including in public health, Norfolk and Waveney Clinical Commissioning Group and James Paget Hospitals. Third sector partners at the forefront of delivering wellbeing, economic and health outcome change in our communities, such as Access Community Trust, have been centrally involved.

We're planning with our partners in Highways, the Police, our rail operator and public transport colleagues, organisations such as RNLI who provide beach safety, colleagues in coastal protection, how we will move very large numbers of people into and around the area and plan major events, public safety and access.

3. Diversity of leadership, governance and partnerships

Locally, we have diverse communities in which people from many backgrounds have come to live and work, with significant Romanian, Slovakian, Lithuanian, Polish, Bulgarian and historic Greek Cypriots and Portuguese communities.

We also have significantly larger than national average numbers of people with disabilities or life-limiting conditions, and disparities of wealth and life chances.

Our City of Culture will set out to involve and give voice to people from all our communities, and from all backgrounds, and where people from identified groups are under-represented we will take action to increase their stake and involvement.

UK City of Culture gives us a unique opportunity to work with artists and participants, and to reach audiences, from all backgrounds, ensuring the full representation of all identities and voices in all our programmes, and all our audiences.

4. Why is UK City of Culture important to us?

We have a unique place and culture to share with the people of the UK and far beyond, at the same time the UK City of Culture can transform the lives of our communities, addressing decades of disadvantage, with a legacy for the years ahead.

Increasingly, we are at the heart of national life. Our innovation in renewable energy is driving the national campaign for a sustainable future, our seas are once again busy with sustainable shipping and researched as solutions to ecological and sustainability challenges.

This innovation is fitting for the place where the sun rises first every morning on the UK, but it is also rooted in the heritage and identity of our place and people.

These are ancient communities – the first place that humans crossed Doggerland to set foot on what is now Britain - and centuries of living on sea and land, fishing, trading with the world, and then welcoming the world to enjoy our place, has fitted us for what is to come.

We have made huge strides in recent years, celebrating and sharing our vibrant cultures, but we have much more to do. City of Culture offers the chance to share all that our brilliant cultural organisations have achieved, and their visions and dreams, with everyone around the UK – and to secure the investment and momentum to continue our journey.

Our coast is much loved and visited - Great Yarmouth and East Suffolk welcome more than 20 million visits a year – attracted by our natural heritage, our culture, our sense of fun and our people. UK City of Culture will be a big but natural step in the development of this fantastic offer, building on the ground-breaking events and festivals of the last few years and planning many more and new events with partners locally, across the UK and internationally so that 2025 will be a celebration of our coast and of many other cultures across the world.

We have world class work in hand - from Great Yarmouth's spectacular Winter Gardens and its renewal in time for the celebrations (awarded £10m of Heritage Horizons funding by Heritage Fund), and Ice House Circus School development, to our National Trust partners at Sutton Hoo. Generations of artists have made their way here to live and work, UK City of Culture will renew and diversify this creativity for generations to come. Ours will be a celebration at once rooted in our communities and heritage and reaching out to the world; fundamentally of its place and time, reflecting the cultures of the world with which we traded, those who came and continue to come here to make their lives - and timeless – stretching back into our history and surging forward to our sustainable future.

And that future is key to our vision – a legacy for our communities, for our young people in which opportunity is levelled up, talent nurtured and retained, health and life inequality ended through opportunity and activity; our diverse communities fulfilled and enriched, their culture squarely on the world stage.

5. Key Themes of our UK City of Culture 2025 Programme

We've just started this journey and themes should not be straitjackets - they should intrigue, entice, stimulate and enable everyone to find a point of embarkation...

The irresistible pull...

The UK was formed by the sea – more so here than anywhere. It made us, connected us, carried our influence around the world. It brought, and brings, people, cultures, ideas and energies to this most innovative, bold and welcoming place. It brings challenges of coastal change. And it is the focus of our next reinvention, the UK's leader in clean energy. *The sea: awe-inspiring, changeable - a uniting energy!*

The silver darlings...

So many of our stories are of migration: silver herring, people, birds... Great Yarmouth & Lowestoft were built on migrations of herring, and of **people**: the Scottish herring girls; the first humans crossing Doggerland; communities welcomed from all over the world, links with partners across the North Sea and beyond. These traces, **migrations and connections** resonate through our programmes as they do in the migrations of the sea and the birds across our reserves and landscapes.

The blue space...

We keep coming back to water and wellness. And the connections we make between them. Celebrations on water – at sea, in historic ports and tributaries that carried our forebears inland – to places like Sutton Hoo. Our Waterways longer than Venice or Amsterdam. Flotillas, regattas, community/artist boatbuilding; the sunrise before anywhere else in England; festivals of fire and light writ large.

But also *the healing power of water and the capacity of our landscapes for quiet, reflection, recovery*. With our health partners we will focus on wellbeing and mental health - of our communities, our young people and volunteers, our artists and visitors – the power of Blue Space.

The landscape that ate my heart...

The great beaches and inspirational landscapes of the UK will be the great glories of 2025 – our sweeping coastline, land and water, our wildlife, new opportunities to

experience nature and culture as one. With Broads National Park, Suffolk Wildlife Trust and others, we will explore this landscape, unspoilt, rewilded, in a physically present and digitally resonant way, to be the galleries and halls for the work of contemporary artists, writers, composers, musicians, performers - haunting, playful, compelling. *A landscape of immediacy and a landscape of mind*.

listen to your heart and celebrate...

Our towns are some of the great places of *entertainment of the UK*. Our beaches great playgrounds, the splendours of the Great British Seaside. Great Yarmouth the home of circus and Lowestoft the spectacular celebration of First Light. Our programme will be a celebration and a release for all of the UK – of music, street performance, comedy, theatre – and our beaches will see events like no other in the UK for scale, audacity and brilliance. Fitting the coast generating the UK's future energy!

6. Embedding environmental sustainability

Great Yarmouth & East Suffolk have a unique position in this debate – we have a highly sensitive coastal environment, our coast, landscape and main towns are particularly vulnerable to the cumulative effects of climate change - at risk from sea level rise and extreme weather, with great areas inland of delicate ecosystems of wetland, marsh and the most important breeding habitats for many species of invertebrate, bird, fish and animal.

In recognising the need to respond to these challenges – including decarbonisation of our economies and the requirement for physical adaptation - local carbon emissions have fallen, but much remains to be done. At the same time, our coastline is at the centre of the world's largest market for offshore wind, the staging of wind turbines forms a very visible part of our skylines and the sector has a key role in our evolving economy and the livelihoods of our residents, with the potential to create real opportunities for local communities, address structural inequalities and meet societal expectations and ambitions around resource depletion, environmental quality and climate change.

Our City of Culture programme will rise to these challenges and opportunities – with a practical focus. Wherever possible events will be planned to be net zero carbon and with managed environmental impacts. Special arrangements for waste management and remediation will be in place across the programme and we will identify and empower sustainability champions among our governance, staff, volunteers, artists/partners and communities who we will brief, support and enable to call the programme to account.

Risks and impacts will be mitigated through sustainable event planning, in which strategy is tested against a Sustainability Assessment System, and appraised by our sustainability partners UEA (and their world-renowned Tyndall Centre for Climate Change Research) and Cambridge Institute of Sustainability Leadership so that our programme is a test and an exemplar for new approaches and the decarbonisation of the cultural sector.

We will focus not only on energy, but also on an end to end analysis of the environmental lifecycle of our events – travel to site of artists, kit and audiences; energy consumption, site impacts, audience wellbeing, air quality impact, light and impact on our dark skies, waste, recycling and reuse, remediation of event venues, behaviour change, sustainability legacy.

7. Investment Plan

We have developed a comprehensive financial analysis which shows the cost of delivery to be in the region of £36m over six years. Infrastructure investments already committed for the geographic area in-scope total at least £300m and will be significantly higher by 2025. Our outline programme will see investment of £13.6m ranging from major highlight events to extensive resources for community activity. The programme itself will feature our range of venues, promoters and festival organisers - aligning their year round programmes with our UK City of Culture 2025 Programme.

8. Impact

Residents and communities are at the heart of our ambitions to realise a vibrant and inclusive coastal economy and our years as the holder of the UK City of Culture designation, our programmes and our planning and evaluation will mark a step change in our benefits for those communities.

Over recent years, and despite our huge progress, Great Yarmouth and Lowestoft share a number of complex, interrelated challenges with other seaside towns – connectivity/isolation, the quality of housing stock, population seasonality, transience and demographics, health/wellbeing outcomes and the availability/accessibility of funding, reflect in a persistent legacy of deprivation, depressed wages, land values and restricted social mobility, which exacerbates structural inequalities.

Skills, qualifications, aspirations, intergenerational life choices and a traditional reliance on certain forms of employment or specific industries are a limiting factor in residents' wealth and employment opportunities. Both the labour market and demand for public/health services are distorted by demographics - our age distribution is skewed towards older, less economically-active individuals. GVA per head has failed to keep pace with other similar areas. This is the challenge which we aim to address in all our regeneration investments and strategy, but in which we aim to achieve a step-change by being UK City of Culture 2025.

The challenges our communities face are multiple and reinforce one another. Residents tend to work longer hours and earn less and are frequently employed on a casual/seasonal basis in lower-skilled positions.

If local people of all ages and backgrounds are to benefit from new opportunities and wider economic recovery, they need to be able to access the right jobs at the right level. If our place can successfully enhance its 'offer' to better meet the expectations of growth industries' employees in terms of culture, heritage and artistic provision, there is significant potential to attract and retain human capital and further investment – enabling a range of wider ambitions in relation, for example, to the high-growth clean energy sector.

Heritage, arts and culture is, therefore, an engine of local opportunity; capacity building in our key creative clusters will confer transferable, portable skills and create real opportunities for residents, bring new creatives and employers to be role models for our young people – and sustain the 'lifestyle' buzz so intrinsic to local distinctiveness and sense-of-place, attracting and retaining visitors and driving consumer footfall.

Culture is absolutely intrinsic to both sense-of-place, the vitality of the wider economy, further transformational renewal and the massive physical and social regeneration interventions already underway.

By 2025 and more especially, by the end of 2028, we will have taken a step change – for our creatives and our cultural sector, in the value to our wider economy and in pride, confidence and appreciation of the huge strengths we have as a place – a step change of real immediate benefit to people's lives, irreversible and sustainable, as we take our place as one of the UK's exemplars of the way we can level up our societies through partnership, patience, long term investment and care, but also by the step change that a celebration such as City of Culture can achieve.

9. Legacy

It is central to our thinking that UK City of Culture should be about both the year itself but also be profoundly transformational for our culture, our economy, our communities and our environment – and for our region generally – for many years thereafter.

We are committed to an engaged and co-designed process with our communities as we develop our bid, through which we will enable and empower them to identify the legacy they most need and want to see from their City of Culture – but even at this stage, we can see from our conversations with our communities and cultural partners the aspirations and ambitions that are coming to life through the City of Culture process.

Our cultural sector identifies a legacy that takes growth and confidence into the decades beyond 2025. Our cultural organisations want to be better recognised and celebrated locally, nationally and internationally, to have better resources to make great work, with resilience and the ability to plan long-term. There should be new opportunities for our own talented creatives to stay and work here successfully, and particularly for our creative young people, but there is also an ambition that we should welcome many new creative businesses to come and be based here, or just to make work here, including in filming and multi-media production to strengthen the supply chain for local creative businesse.

Our venues and event promoters see a legacy of raised profile, improved infrastructure, market intelligence and position, combatting seasonality and increasing production capacity and audiences.

Our communities and residents demand sustained improvements in their lives – and there is excitement about a legacy of 2025 that touches the challenges we face – improving prosperity, creating new quality jobs, building confidence, resilience and health through engagement and improving our people's wellbeing. Through more people taking part, more people exploring creativity and connecting with others from

all backgrounds in their community, momentum will be achieved to sustain the change in all the years that follow.

We see a legacy for our environment – investment in and celebration of our journey to decarbonisation and sustainability, closer partnerships with our renewable energy sector to drive benefits to local organisations and people, increased sustainable tourism including to support the economic resilience of our environmental management organisations and profound potential to change behaviours among both residents and visitors.

We plan a legacy in which our towns are reimagined, better known, better understood and appreciated at home and beyond – preconceptions addressed and with a new pride and confidence in our future and that of our people; and we are focusing on that legacy from the very start of our bid process, through our theory of change, our engaged development process and delivery structure and through our commitment to long term resourcing and leadership beyond 2025.

10. Contact Us

Support the Great Yarmouth & East Suffolk UK City of Culture 2025 Bid on your social media platforms and website, in your communication bulletins and with your friends and contacts #CityofCulture2025

Get ready to participate when the real work starts – once we get shortlisted in September 2021!

To be kept up to date, take part in workshops and further discussions to shape our Bid please email <u>GY&ESCityofCulture@great-yarmouth.gov.uk</u>
Agenda Item 6 ES/0862



CABINET

Tuesday, 07 September 2021

Subject	East Suffolk Local Council Tax Reduction Scheme (LCTRS) for 2022/23		
Report by	Councillor Maurice Cook		
	Cabinet Member with responsibility for Resources		
Supporting	Brian Mew		
Officers	Chief Finance Officer and Section 151 Officer		
	Brian.mew@eastsuffolk.gov.uk		
	01394 444571		
	Adrian Mills		
	Head of Benefits and Council Tax Billing, Anglia Revenues Partnership (ARP)		
	Adrian.Mills@angliarevenues.gov.uk		
	01842 756491		

Is the report Open or Exempt?	OPEN
	0

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

Purpose and high-level overview

Purpose of Report:

The purpose of this report is to review the 2021/22 Local Council Tax Reduction Scheme (LCTRS) and consider options for the scheme for 2022/23.

Options:

Each year the Council is required to review its Local Council Tax Reduction Scheme (LCTRS). Anglia Revenues Partnership (ARP) have carried out the annual review of the 2021 scheme and have identified several options to consider in relation to scheme amendments for 2022-23.

Option 1 is to retain the existing scheme. Where it is determined to retain the existing scheme, this must be decided by 11 March of the preceding financial year.

Possible amendments to the scheme are shown in Options 2 to 7 below. Options 2 and 3 focus on financial savings, whilst Options 4 to 7 focus on improving the customer journey.

The current East Suffolk Working Age LCTRS scheme provides a maximum benefit of 91.5% for working age claimants and the scheme also fully protects War Pensioners.

Option 2 entails increasing the contribution rate to more than 8.5%.

Option 3 entails capping LCTRS entitlement at the level of Band D Council Tax liability.

Option 4 is to reduce the capital threshold from £16,000 to £10,000 and abolish tariff income.

Option 5 would be to introduce a fixed rate non-dependant deduction.

Option 6 is to further streamline the claim process.

Option 7 is to increase the tolerance for Universal Credit data re-assessments.

Recommendation/s:

That Cabinet approve that a consultation be undertaken on the following proposed amendments to the East Suffolk Local Council Tax Reduction Scheme (LCTRS) for 2022/23:

- Reducing the capital threshold from £16,000 to £10,000 and abolishing tariff income.
- Introducing a fixed rate reduction of £7.40 for non-dependants.
- Further streamlining the claim process.
- Increasing the tolerance for Universal Credit data re-assessments from £65 per month to £100 per month.

Corporate Impact Assessment

Governance:

None arising directly from this report.

ESC policies and strategies that directly apply to the proposal:

East Suffolk Local Council Tax Reduction Scheme (LCTRS)

Environmental:

None arising directly from this report.

Equalities and Diversity:

An Equalities Impact Assessment (EqIA) has been prepared in respect of the proposals recommended in this report. This EqIA will be revised if necessary if the consultation indicates any changes in respect of the impact on one or more Protected Characteristic groups.

Financial:

Although primarily focussed on improving the customer journey, if implemented, the recommended proposals are estimated to generate savings to the East Suffolk Collection Fund in the region of £97,000, around £13,000 of which would be attributable to East Suffolk Council.

Human Resources:

None arising directly from this report.

ICT:

None arising directly from this report.

Legal:

None arising directly from this report.

Risk:

None arising directly from this report.

	If it is agreed to accept the proposals detailed in this report, a consultation exercise will need to take place in the Autumn with a consultation period of 6 weeks. Options 2 and 3 would require a consultation period of 12 weeks.
External Consultees:	The consultation will take the form of an online customer survey, asking stakeholders for their views on the proposals and any unforeseen impacts. The link to the survey will be made available on the Council and ARP websites, sent to all stakeholders and preceptors.

Strategic Plan Priorities

Select the priorities of the <u>Strategic Plan</u> which are supported by this proposal: (Select only one primary and as many secondary as appropriate)			Secondar y	
-	priority	priorities		
T01	Growing our Economy			
P01	Build the right environment for East Suffolk			
P02	Attract and stimulate inward investment			
P03	Maximise and grow the unique selling points of East Suffolk			
P04	Business partnerships			
P05	Support and deliver infrastructure			
T02	Enabling our Communities			
P06	Community Partnerships			
P07	Taking positive action on what matters most		\boxtimes	
P08	Maximising health, well-being and safety in our District			
P09	Community Pride			
T03	Maintaining Financial Sustainability			
P10	Organisational design and streamlining services			
P11	Making best use of and investing in our assets			
P12	Being commercially astute			
P13	Optimising our financial investments and grant opportunities			
P14	Review service delivery with partners		\boxtimes	
т04	Delivering Digital Transformation			
P15	Digital by default		\boxtimes	
P16	Lean and efficient streamlined services		\boxtimes	
P17	Effective use of data		\boxtimes	
P18	Skills and training			
P19	District-wide digital infrastructure			
T05	Caring for our Environment			
P20	Lead by example			
P21	Minimise waste, reuse materials, increase recycling			
P22	Renewable energy			
P23	P23 Protection, education and influence			
XXX	Governance			
XXX How ESC governs itself as an authority				
How	How does this proposal support the priorities selected?			

The LCTRS provides important support to people in East Suffolk, directly contributing to the key theme of Enabling our Communities. The changes proposed for implementation in April 2022 will further reduce customer notifications and contact; further reduce continuous changes to benefits received; and contribute to overall improvement of the customer journey.

Background and Justification for Recommendation

1	Background facts
1.1	This is now the ninth year of LCTRS; a locally set scheme that replaced the nationally set Council Tax Benefits (CTB) scheme from April 2013. In 2013/14 a one -off Government grant compensated in part for the reduction in Government funding for the Working Age scheme that year. This meant that the maximum LCTRS awarded was 91.5%. This scheme, adopted by both Suffolk Coastal and Waveney District Councils, has basically been maintained since, and the current East Suffolk LCTRS scheme provides a maximum benefit of 91.5% for working age claimants and the scheme also protects War Pensioners. The aim in designing the scheme was to achieve a balance in charging an amount of Council Tax to encourage customers back into work whilst setting the amount charged at an affordable and recoverable level.
1.2	By setting the amount payable at 8.5% of the charge, in most cases, where a customer is not paying, we can affect recovery through attachment to benefit within a year and so the charge with costs is recoverable. If the amount payable was set higher, then it is possible the debt would not be recoverable and possibly create a culture of non-payment of Council Tax.
1.3	For 2014/2015 to 2017/18 the original scheme was retained, except that allowances and premiums (the amounts of income from state-administered benefits such as Jobseekers' Allowance) were increased in line with other benefits such as Housing Benefit.
1.4	For the 2018/19 scheme there was a consultation on a proposal to harmonise the scheme to DWP welfare reforms introduced for Housing Benefit and LCTRS for Pensioners and introduce closer links to Universal Credit data share for claims, thereby removing the stipulation to make a separate claim. This was subsequently approved and introduced.
1.5	For 2019/20, East Suffolk Council kept the same scheme as its predecessor councils had operated for 2018/19.
1.6	For 2020/21 the only change, after consultation, was to introduce a fluctuating earnings rule to the treatment of Universal Credit. A weekly tolerance level of £15 (£65 monthly) was introduced to reduce the number of monthly reassessments impacting customers every time a revised Universal Credit notification is received.
1.7	Against the uncertain background of the Covid-19 pandemic, Cabinet agreed that there would not be any changes to the LCTRS for 2021/22, with a full review being undertaken this year to develop a range of options for consideration and possible consultation.

2 Current position

2.1	Councils are required to review their LCTRS schemes annually and consider
	whether any changes need to be made. Where it is determined to retain the
	existing scheme, this must be decided by 11 March of the preceding financial year.

2.2	Where councils decide that they wish to amend their schemes they need to consult preceptors and stakeholders and undertake a wider consultation to inform a final scheme design by 28 February of the preceding financial year. A final report will consequently need to be considered by Cabinet in December 2021.
2.3	The current East Suffolk Working Age LCTRS scheme provides a maximum benefit of 91.5% for working age claimants and the scheme also fully protects War Pensioners. The aim in designing the scheme was to achieve a balance in charging an amount of Council Tax to encourage customers back into work whilst setting the amount charged at an affordable and recoverable level during the year.
2.4	A statutory scheme applies to Pensioners who can receive up to a maximum100% reduction of their Council Tax bill.

3	How to address current situation
3.1	ARP have undertaken a review of the scheme and have identified a range of options for amendments. Options 2 and 3 focus on financial savings, whilst Options 4 to 7 focus on improving the customer journey
3.2	Option 1 is the default option of retaining the existing scheme. However, it is not recommended in this report that this option be adopted, as the review has indicated that improvements can be made to the existing scheme for 2022/23.
3.3	As an option to potentially realise financial savings, Option 2 would entail increasing the contribution rate to more than 8.5%. If this option was proposed it should be noted that a 12-week consultation period would be required. The potential savings to the collection fund to be realised by increasing the minimum contribution rate to 10%, 15% or 20%. An estimated 10,169 customers would see increases in their council tax liabilities at these levels, and the totl estimated net savings in respect of each are shown below: Increase in liability to 10% £171,497 Increase in liability to 15% £740,539 Increase in liability to 20% £1,303,256
3.4	However, the possible increase in Council Tax charged by the Council would be less than the additional costs of recovery incurred (additional staff, postage and enquires to customer services), and in most cases we would not be able to recover the debt in year by deduction from DWP benefits and therefore this is not recommended, as detailed in Appendix A.
3.5	The impact of Covid-19 must also be considered, as we would expect that some continued economic impacts could affect individuals' ability to pay into the 2022/23 financial year.
3.6	Option 3 entails capping LCTRS entitlement at the level of Band D Council Tax liability. This would realise savings to the Collection Fund of around £60,936 per year and would result in around 130 customers who reside in Band E properties or higher having their liability calculated on the cap at Band D.
3.7	This option has been suggested in the past for consideration but has not been adopted to date. This change represents a very small potential financial gain for the collection fund and the additional council tax could prove costly and difficult to collect, as detailed in Appendix A. It is also a measure that would be likely to generate more contact and complaints and not contribute to the customer

	journey. Consequently, it is not recommended.		
3.8	Option 4 is an option with broadly neutral financial impacts on customers to improve the customer journey by reducing the capital threshold from £16,000 to £10,000 and abolishing tariff income.		
3.9	This option would result in:		
	 A simplified scheme reducing the burden on customer and evidence requirements 		
	 Reduced number of claim adjustments as there would be no requirement to notify changes in capital of £250 or more 		
	 More streamlined customer experience and reduced processing times for universal credit claims as tariff income details are not provided in DWP data share records 		
	 Targeting help to those most in need as those with less capital will receive increased awards and those who no longer qualify will have more than £10,000 capital. 		
3.10	Simplification would enable us to provide quicker decisions to such customers as the need to manually calculate tariff income would be removed. This option is relatively cost neutral, with potential savings of around £17,000. Its estimated that 13 customers would gain under this option with 22 losing.		
3.11	Option 5 would introduce a fixed rate non-dependant deduction. This option would result in:		
	 Reduced burden on customer and evidence requirements 		
	 Reduced number of claim adjustments as there would be no requirement to notify changes in non-dependant income. This is something the customer is not always aware of or able to obtain verification of themselves 		
	 The functionality to verify and receive automatic income updates from DWP and HMRC does not extend to non-dependants meaning verification is always a manual process and the onus is solely on the customer to identify and report changes for their adult household members 		
	 More streamlined customer experience and quicker processing times for Universal Credit claims as DWP do not gather details of non- dependant's income and the responsibility on the Local Authority to obtain this missing information delays claim processing - delays in and failure to provide non-dependant income details results in incorrect LCTRS awards, often impacting council tax collection and arrears. 		
3.12	An administrative consequence of this proposal would be that our ability to increase automation and provide decisions to customers in one day would be extended to those with non-dependants, as the need to request follow up details would be removed. Existing protections for customers entitled to a severe disability premium would be retained meaning they would continue to be exempt from non-dependant deductions'		

3.13	This option focusses on an improved customer journey and reduction in administrative burden and although indicating some savings the proposed deduction rates have been modelled to provide a relatively cost neutral option as detailed in the table below:					
3.14		Estimated Saving	Customers gaining	Customers with reductions		
	Fixed non-dependent deduction £5.30 for all non-dependents	£30,757	174	417		
	Fixed non-dependent deduction to £7.40 for those not passported	£79,574	223	392		
3.15	The first option above applies one fixed rate deduction of £5.30 for all non- dependants based on the current average deduction rate, including those on passported benefit, whilst the second option above retains a nil deduction for non- dependants in receipt of passported benefits but introduces a fixed rate deduction of £7.40 for non-dependants based on current average.					
3.16	Over the years, the claim process has been streamlined and Option 6 is a further development of this. DWP signpost everyone claiming Universal Credit (UC) to their Local Authority to make a separate application for LCTRS. However, whilst our scheme was amended to allow us to treat DWP notification of UC outcome as a claim, we often receive separate customer claims.					
3.17	Simplifying the claim process to impro through introducing the following cla				k	
	a. those in receipt of					
	b. those claiming or a	Iready in rece	ipt of UC			
	c. customers not required widows	uired to claim	UC, such as wa	r pensioners	and	
3.18	We expect this proposal will minimise administration and improve processing			rove speed o	f	
	 Clarifying the customer journal separate claim is required 		oving any confu	sion that a		
	 Reducing customer burder UC claim 	n to provide e	vidence throug	h making a n	on-	
	 Removing requirement for same income details 	r both DWP ar	nd Local Author	ity to verify		
	 Maximising customer inco Universal Credit 	me by signpo	sting customers	s to claim		
	Makes full use of DWP dat	a share funct	onality			
3.19	Data analysis undertaken for the first only three customers have applied di receipt of a legacy benefit or UC or w	rectly to the L	ocal Authority	without being	g in	

	same time. Implementing this change would signpost all three to claim directly with the DWP, resulting in two of them being entitled to UC and LCTRS and one not being entitled to UC, but still being entitled to LCTRS. Therefore, whilst a small sample, the data suggests two thirds of the customers we would signpost to claim UC, as they haven't already done so, would be better off as a result and so would not need to make a separate claim to us for LCTRS.
3.20	Option 7 is to increase tolerance for Universal Credit data re-assessments. In April 2020 a tolerance rule of £65 per month was introduced which meant we no longer reassessed income changes of less than £15 per week for UC customers. UC is designed to be paid monthly, calculated on the customer's circumstances, including Real Time Information (RTI) earnings data from HM Revenue and Customs. Given customers' circumstances, especially earnings, fluctuate, this leads to significant volumes of monthly revised UC awards sent to the Council by the DWP.
3.21	Due to the tolerance rule such customers have seen a reduction by one third in Council Tax adjustment notifications, as well as a reduction in direct debit amendments and the need to request a refund. This has provided greater certainty to customers to enable to them to manage their payments and household budgets, with it being well received and working as expected.
3.22	The introduction of a fluctuating earnings rule has been particularly beneficial given the significant increase in the COVID-19 workload for Anglia Revenues Partnership, which peaked at a 500% increase compared to the same point last year, before reducing to 200% and now starting to return to normal levels.
3.23	A review of the tolerance rule suggests increasing the figure from £65 per month to £100 per month would further reduce the need for re-assessments from a third to a half, thereby providing more customers with stable payment arrangements, fewer adjustments and improved financial certainty. By retaining the discretion to review exceptional cases we will be able to override the rule in the case of a single beneficial change being reported. However, we are yet to see a case where discretion has been needed with the current £65 tolerance, given most cases have monthly fluctuations reported which evens out any impact of applying the tolerance over the course of a year.

4	Reason/s for recommendation
4.1	 It is recommended in this report that the focus of consultation and implementation be on those options intended to improve the customer journey and reduce customer contact and the burden of evidence requirement, specifically the following: Reducing the capital threshold to £10,000 and abolishing tariff income (Option 4) Introducing a fixed rate deduction of £7.40 for non-passported non-dependants (Option 5) Streamlining the claim process (Option 6) Increasing tolerance for Universal Credit data re-assessments (Option 7).
4.2	Options 1,2, and 3 are not recommended for consultation and implementation for the reasons previously outlined in this report.

Appendices

Appendices:

Appendix A Options 2 and 3 Financial Implications

Background reference papers:

None.

EAST SUFFOLK

Detential Income															
Potential Income															
			Band D	£ 1	1,251.38	£ 1	45.78	£	237.69	£	171.27	£	73.25	£	1,879.37
					66.59%		7.76%		12.65%		9.11%		3.90%		100.00%
				Share											
Current 8.5% liability reduction		Savings		Co	ounty	Adult	SC	Polie	ce and Fire	Ea	ast Suffolk		Parish		Total
10% liability reduction - 13/1	4 AA	£ 171,497.55		£ 29	9,056.78	£ 3,3	84.98	£	5,519.11	£	3,976.85	£	1,700.85	£	43,638.58
15% liability reduction - 13/1	4 AA	£ 740,539.83		£ 122	2,988.35	£ 14,3	27.58	£	23,360.69	£	16,832.79	£	7,199.17	£ 1	84,708.57
20% liability reduction - 13/1	4 AA	£ 1,303,256.59		£ 216	5,113.01	£ 25,1	76.17	£	41,049.00	£	29,578.29	£	12,650.26	£ 3	24,566.73

Recoverability										
Band B	County	Adult SC	Police and Fire	East Suffolk	Parish					
										surplus or
	£ 973.30	£ 113.38	£ 184.87	£ 133.21	£ 56.97	£ 1,461.73	costs	Total payable	DWP AoB	deficit
8.5%						£124.25	£75.00	£199.25	£195.00	-£4.25
10.0%						£146.17	£75.00	£221.17	£195.00	-£26.17
15.0%						£219.26	£75.00	£294.26	£195.00	-£99.26
20.0%						£292.35	£75.00	£367.35	£195.00	-£172.35

Appendix A: Recoverability of minimum liability % against DWP deductions

Agenda Item 7 ES/0865



CABINET

Tuesday, 07 September 2021

Subject	Extension of East Suffolk Youth Employment Service
Report by	Councillor Craig Rivett
	Deputy Leader and Cabinet Member with responsibility for Economic Development
	Councillor Letitia Smith Cabinet Member with responsibility for Communities, Leisure and Tourism
Supporting Officer	Simon Charlesworth Sector Development & Trade Lead <u>Simon.charlesworth@eastsuffolk.gov.uk</u> 07341 739619

Is the report Open or Exempt? OPEN

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

Purpose and high-level overview

Purpose of Report:

Young people aged 16-24 have been affected by the pandemic in ways that are not immediately clear, and the long-term effects on their 'life chances' through employment, education, and training remain largely unknown but are expected to be significant and detrimental.

At the start of the pandemic, young people saw their secondary education disrupted, and as time progressed, their transition into further and higher education is also being affected. For those in work, and at the start of their careers, young people were facing a lack of employment opportunities, redundancy, and furlough. These factors have rarely been seen in peacetime and have contributed to increased uncertainty for young people at a vulnerable period in their lives.

Whilst the economy is recovering following the easing of lockdown restrictions, it remains unbalanced and uncertain. GDP remains below pre-pandemic levels, and supply chains have been shown to be vulnerable to global factors. Labour and material costs have increased, compounding the challenges for businesses that are already vulnerable.

This report considers the issues facing young people in East Suffolk in terms of employment, education and training and proposes a two year extension to the current contract that builds on existing work supported by East Suffolk Council and partners including Suffolk County Council, and provides a comprehensive framework to support young people into employment, education, or training, as well as providing important wellbeing services and support.

Options:

East Suffolk Council, along with Suffolk County Council, and Suffolk Public Sector Leaders, have funded the East Suffolk Youth Employment Service (YES) since November 2019. The funding is due to expire at the end of October 2021, and the service will close.

Young people will face significant challenges over the next two years in terms of accessing sustainable employment, education and training opportunities, many of which are unknown, and perhaps unforeseen.

Options include:

Option 1: Do nothing and allow the East Suffolk YES programme to continue to its contractual conclusion at the end of October 2021. This would result in no comprehensive support being provided within the district for young people at risk of being NEET and long-term unemployed,

Option2: To agree funding for a one-year extension of enhanced youth employment services in East Suffolk to be delivered by Inspire Suffolk, as described in Appendix A. The second year of extension will be subject to re-procurement rules but it is proposed that the funding be allocated for two years given the long term impacts of economic challenges and fluctuations on young people in East Suffolk.

Recommendation:

That Cabinet approve funding for a further two-year extension to youth employment services in East Suffolk at a cost of £230,267. The first year of the extension will be an

extension to the existing contact with Inspire Suffolk whilst the second year of the extension will need to go out to procurement.

Corporate Impact Assessment

Governance:

Delivery of the East Suffolk YES is subject to continuous monitoring and review by the East Suffolk Project Officer. Monthly meetings are held with the service provider and monthly, quarterly, and annual reports are reviewed and opportunities for continuous service improvement identified and discussed. All participants aged 16 and 17, are registered with the Suffolk County Council RPA (Raising Participation Age) Service.

ESC policies and strategies that directly apply to the proposal:

ES Strategic Plan

ES Economic Growth Plan

ES Enabling Communities Strategy

Environmental:

There are no specific environmental implications in relation to this proposal

Equalities and Diversity:

An Equality Impact Assessment has been undertaken of this project. This EqIA specifically focusses on the Age and Economic Deprivation Protected Characteristics and identifies that continuing to fund YES will inevitably have a positive impact on the lives of young people in East Suffolk, specifically those who are economically disadvantaged, whilst allowing the funding to cease on October 2021 would have negative impacts on both protected characteristic groups. There may also be positive impacts on young people with disabilities, depending on who accesses the service, if it were to continue.

Financial:

To extend the ES YES programme for a further two years will result in a cost to ESC of £230,267. In the Budget and MTFS report to Full Council on 24 February 2021 it was reported that for 2021/22 only, Suffolk Public Sector Leaders (SPSL) have agreed that their share of pooling benefit from the Suffolk Business Rates Pool will be distributed to the pool members using the same methodology as for the normal distribution. In addition, in the MTFS it was indicated that there was an option to transfer what would have been the SPSL element into a more specific community-focussed earmarked reserve. The preferred option in this report fits this criterion. Pending realisation of this SPSL share, it is proposed that this option be initially funded from the Business Rates Equalisation Reserve that currently contains accumulated Pooling Benefit.

Human Resources:

There are no direct Human Resources implications for East Suffolk Council as the programme is delivered through a third-party organisation. However, if the project were to cease in October 2021, the result would be the loss of 2-3 posts currently employed by Inspire Suffolk.

ICT:

There are no direct ICT implications for East Suffolk Council. Delivery of the current programme is currently mainly online and in future there is likely to be a blended approach depending on the needs of each young person.

Legal:

An agreement to extend Inspire Suffolk's current delivery of the YES programme will require a new/ extended contract to be agreed between the two parties.

Risk:

The proposal to extend the YES programme provided by Inspire Suffolk clearly sets out the proposed outcomes, outputs and benefits. Risk is consistently evaluated by Inspire Suffolk in delivering the programme and their whole delivery model was successfully adapted in light of Covid-19. Key risks include inability to reach the intended number of beneficiaries, the inability to secure training or employment for young people on the programme due to the legacy of Covid-19 and the impact of future lockdowns.

External Consultees:	Embedded within the planned improvements to the service, East Suffolk Council will consult directly with young people and businesses to ensure that the service meets the needs of all participants. Currently, results from customer satisfaction surveys are presented to ESC by the service provider.
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Strategic Plan Priorities

this p	t the priorities of the <u>Strategic Plan</u> which are supported by proposal: ct only one primary and as many secondary as appropriate)	Primary priority	Secondar y priorities
T01	Growing our Economy		•
P01	Build the right environment for East Suffolk	\boxtimes	
P02	Attract and stimulate inward investment		\boxtimes
P03	Maximise and grow the unique selling points of East Suffolk		
P04	Business partnerships		\boxtimes
P05	Support and deliver infrastructure		
T02	Enabling our Communities		
P06	Community Partnerships		\boxtimes
P07	Taking positive action on what matters most		\boxtimes
P08	Maximising health, well-being and safety in our District		\boxtimes
P09	Community Pride		
т03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services		
P11	Making best use of and investing in our assets		
P12	Being commercially astute		
P13	Optimising our financial investments and grant opportunities		
P14	Review service delivery with partners		
т04	Delivering Digital Transformation		
P15	Digital by default		

P16	Lean and efficient streamlined services	
P17	Effective use of data	
P18	Skills and training	\boxtimes
P19	District-wide digital infrastructure	
T05	Caring for our Environment	
P20	Lead by example	
P21	Minimise waste, reuse materials, increase recycling	
P22	Renewable energy	
P23	Protection, education and influence	
XXX	Governance	
XXX	How ESC governs itself as an authority	

How does this proposal support the priorities selected?

Build the right environment for East Suffolk

Ensuring that ES has an appropriately skilled workforce will be vital in making sure that the economic growth, which is taking place and is due to take place across the District in coming years, benefits the resident population as much as possible. This aligns strongly with the Council's inclusive growth objectives.

Attract and stimulate inward investment

The YES initiative will increase the economically active population within the District and provide appropriately skilled people related to East Suffolk's key growth sectors, which in turn will provide a boost to business investment.

Business Partnerships

The YES initiative involves collaboration with businesses in the district to ensure there are a flow of opportunities that 'graduates' from the programme can take advantage of. This partnership with local businesses is crucial to ensuring the success of the initiative and in turn provides employers with much sought after labour.

Skills and training

The YES programme supports young people to access education and training and a key part of this will be the development of their digital skills. This in turn will support local economic growth since digital/ tech is a key economic growth sector for East Suffolk.

Community Partnerships

Through an exercise undertaken by the Community Partnership Board at its June 2021 meeting, a number of priorities were identified in terms of the impact of Covid in East Suffolk, including young people's aspirations and opportunities. This is also a priority for three of the individual Community Partnerships.

Taking Positive Action on What Matters Most

This priority is about using data as the basis for identifying and addressing need. The impact of the pandemic on young people, particularly in coastal communities, has been identified through various studies at both national and Suffolk level and is therefore a clear priority.

Maximising Health, Wellbeing and Safety in our District

The focus of this priority is on enabling everyone to lead healthy, active, fulfilling and safe lives. The YES service clearly contributes to this in that it enables young people to achieve

Background and Justification for Recommendation

1 Background facts

1.1	In October 2019, East Suffolk Council commissioned Inspire Suffolk to deliver the East Suffolk Youth Employment Service (YES). The service was introduced to provide district wide support to young people aged 16-24 who are not in education, employment, or training (NEET). The YES programme is delivered in collaboration with a wide range of local partners such as DWP, the Early HELP and Social Care teams at SCC, East Coast College, Suffolk New College, Access Community trust and a range of other training providers. This level of engagement and collaboration with other organisations allows the programme to maximise its reach to the client group and also ensure there are strong links to the wide variety of support available.
1.2	Utilising two experienced Employment Coaches, operating from premises in Lowestoft, Leiston, and Felixstowe, young people have been provided with the support and interventions required to meet their immediate life goals. In addition, an Employer Engagement Advisor worked with businesses to identify employment opportunities for participants in the service.
1.3	The advent of Covid-19 in March 2020 meant that all face-to-face provision had to end and the local 'drop in' centres were required to close. At this point young people were being severely affected by the pandemic. Their secondary education was being disrupted, and as time progressed, their transition into further and higher education was also being affected. For those in work, and at the start of their careers, young people were facing a lack of employment opportunities, redundancy, and furlough.
1.4	Inspire Suffolk evolved the East Suffolk YES programme into a digital service, launching a dedicated website, introducing a digital classroom, and training platforms. Face to face coaching was replaced with video conferencing, and standard telephony.
1.5	The East Suffolk Yes programme has, up to the 30 th of June, engaged with, and supported 909 young people aged 16-24 in East Suffolk. Of these, 406 have progressed into a positive outcome comprising of employment, education, and/or training. Further information about the definitions of 'engagement' and 'progression' is provided below.
	The following charts illustrate the programme delivery over time and against a backdrop of the covid 19 pandemic.



period from October 2022 onwards.

2	Current position			
2.1	The easing of social distancing measures has led to an increa across all sectors, coupled with a decline in UK unemployme close to pre-pandemic levels.			
2.2	However, the picture for young people is complex. 'Youth Er published by the House of Commons Library in July 2021 sho that there was a large fall in employment for young people a of the pandemic. This was then followed by a rise in unempl	ows, unsurprisingly, aged 16-24 at the start		
2.3	Rolling forward to the period March-May 2021, unemploym people have fallen back towards pre-pandemic levels but sti compared to 4.8% across the whole population. Also, more economically inactive, standing 10% higher than pre-pander	ll stand at 13.5% young people are		
2.4	As of May 2021, of those young people who are employed n 322,400 jobs held by those aged 24 or under were on furlou 10% of eligible jobs, a greater proportion of jobs than in the	gh, representing some		
2.5	The data paints a picture of elevated unemployment levels f coupled with an increase in economic inactivity since the sta is sensible to assume that the situation in East Suffolk reflect for young people.	art of the pandemic. It		
2.6	In East Suffolk, the unemployment rate for the whole popula 2020), the figure is 4.0% for Suffolk, and 4.8% nationally.	ation is 5.6% (Dec		
2.7	The following table show the number of young people aged claiming Universal Credit, and looking for work.	16-24 in East Suffolk,		
	Young People Looking for Work (Benefits Claimants)	Count		
	Aged 16 - 24 (East Suffolk)	2,053		
	Aged 16 - 24 (Lowestoft)	1,138		
	Aged 16 - 24 (Market Towns)	692		
	Aged 16 - 24 (Felixstowe)	223		
	Source: DWP June 2021			
	According to Suffolk County Council data, 4.6% of 16-18 yea are not in education, employment, or training.	r olds in East Suffolk		
2.8	Whilst the economy is returning to pre-covid levels, there remains uncertainty as to how it will develop over time. Many job opportunities for young people are within the hospitality, leisure, and social care sector and are low wage, fixed-term contracts with limited training and career progression. Primary employment destinations for young people through the ES YES service in recent months include			

	Hospitality, Healthcare, Catering and Construction.
2.9	The Job Retention Scheme (JRS) is due to end on the 30 th of September 2021, and it is unclear how businesses will respond. Young people are particularly vulnerable to redundancy. The Government's Kickstart Scheme provides six months of employment for young people who are claiming Universal Credit; however, it remains too early to determine how successful the uptake of the scheme has been or how many young people will remain in long term employment.

	3 How to address current situation
3.1	Inspire Suffolk was asked to prepare a two-year proposal that would build on the success of the existing YES programme and ensure continuity of service through a period of extreme uncertainty for young people in East Suffolk.
3.2	The proposed service for 2021-2023 will blend the original face to face delivery model with the best of the virtual, online service model. This approach will increase accessibility, ensuring that young people facing barriers such as rurality or anxiety will receive the same dedicated bespoke support as other young people less affected by these issues.
3.3	East Suffolk will be comprised of three zones (North, South, and Central) serviced by three employment coaches, who will develop localised expertise, professional networks, and even more personalised support for young people.
3.4	Physical hubs will be available in Lowestoft and Felixstowe to provide a 'drop in' facility and a venue for face-to-face coaching and development activities. Peripatetic services will also ensure all localities are accessible to the service.
3.5	Every young person participating in the YES service will receive a bespoke roadmap, or customer journey, comprising planned coaching and training interventions designed to upskill, encourage, and support a young person into a successful outcome defined as sustained employment, education, and/or training.
3.6	Utilising a career skills matrix focussing on four key pillars, individual progress will be monitored in relation to four key areas:
	 Personal Network: Peer connections, professional network, knowledge of digital networking. Wellbeing: Housing, emotional wellbeing & mental health, physical health. Employability: previous work experience, knowledge of interview processes, how to write CVs etc. Future Plans: clear goals to strive towards, 'next-step' identified, career ambitions.
3.7	In June 2020, a pilot wellbeing service was introduced by Inspire Suffolk for young people on their support programmes. Participants in the YES programme were able to access a qualified psychotherapist for one-to-one counselling and psychotherapy support. The success of the pilot service means that this service will be expanded and continue to form an integral part of the East Suffolk YES

	programme of support.
3.8	To secure the best possible employment opportunities, an Employment Engagement Advisor will continue to develop close links with employers from a broad range of sectors to try to maximise the employment opportunities available to young people participating in the programme.

4 Reason/s for recommendation

4.1	The reason for recommending a two-year extension to the ES YES programme is to address the continuing challenges facing a significant number of young people wanting to access employment, education, and training opportunities. The proposal from Inspire Suffolk will also implement lessons learned during the previous two years of delivery.
4.2	The next 12 to 24 months will remain a period of uncertainty for the economy, and for those who are dependent upon it for employment opportunities, particularly young people and therefore the ambition is to continue beyond October 2022 which would be the end of Year 3 of the project.
4.3	The withdrawal of the JRS (see 2.8) will be a key test of the resilience of the local business sector in the coming months and it is sensible to have additional support in place for those young people who need it.

Appendices

Appendices:	
None	

Background reference papers:				
Date Type Available From				
15/07/2021	Youth Employment Statistics	House of Commons Library		
05/08/2021	East Suffolk – Area Report	Suffolk Observatory		
05/08/2021	Equality Impact Analysis	Simon Charlesworth		



CABINET

Tuesday, 07 September 2021

Subject	Fleet De-Carbonisation – An Interim Solution
Report by	Councillor James Mallinder
	Cabinet Member with responsibility for The Environment
Supporting	Andy Jarvis
Officer	Strategic Director
	Andy.jarvis@eastsuffolk.gov.uk
	01394 444323

Is the report Open or Exempt?	OPEN

Wards Affected:	All Wards

Purpose and high-level overview

Purpose of Report:

In its Strategic Plan 2020/24 the Council pledged to put the environment at the heart of everything we do and to become a carbon neutral council by 2030. In so doing, it committed to making radical changes to its operational assets including its vehicle fleet.

In 2020/21 the Council's diesel fleet of some two hundred and forty-six vehicles, including its 48 heavy goods refuse lorries, accounted for approximately 44% of the Council's total carbon emissions. Encouraged by debate at the Environmental Task Group, several approaches to reducing these emissions have been investigated. Some are not yet possible as the technology is simply not sufficiently advanced. For example, electrification and hydrogen power. Others involve less developed supply chains and therefore pose a risk to service delivery and are particularly expensive to implement, for example biogas.

This report proposes the replacement of diesel, the fuel currently used by the fleet, by Hydrotreated Vegetable Oil (HVO). This change can be implemented quickly, without the need for engine modifications and therefore at a reasonable cost. It will dramatically reduce the diesel fleet's carbon emissions.

Options:

In seeking a solution to quickly decarbonise the diesel fleet the Council considered the following lower-emission alternative options to the use of fossil-fuel diesel:

- Electrification
- Biodiesel
- Biogas
- Hydrogen
- Hydrotreated vegetable oil (HVO)

Recommendations:

That Cabinet:

- Approves changing the fuel used by all the Euro 6 rated diesel-powered vehicles in the Council's vehicle fleet from diesel to certified palm oil free Hydrotreated Vegetable Oil fuel.
- Approves a procurement process in autumn 2021 for the supply of certified palm oil free Hydrotreated Vegetable Oil fuel meeting the International Sustainability and Carbon Certification.
- Approves in principle the potential additional cost of £150,000 to purchase and install HVO bulk fuel storage tanks to be funded from the capital programme.
- Requires that other than in the most exceptional circumstances any replacement or new fleet vehicles (whether leased or purchased) are Euro 6 compliant.

Corporate Impact Assessment

Governance:

This proposal will be managed through existing governance arrangements.

ESC policies and strategies that directly apply to the proposal:

- Strategic Plan 2020-2024
- Air Quality Strategy 2021
- Medium Term Financial Strategy

Environmental:

The Council's diesel fleet, largely operated by East Suffolk Norse and the Council's Housing Department, contributed 44% of the Council's total carbon emissions in 2020/21. It is the single biggest source of corporate carbon emissions, by some margin.



Switching from fossil-fuel diesel to an alternative low carbon fuel has the potential to ultimately (once the entire fleet has been migrated) reduce annual emissions by approximately $2023tCO_2e$.*

As such, the action proposed has the potential to deliver, and embed, an immediate and significant contribution to the Council's target to become carbon-neutral by 2030. The action will also contribute towards the Authority's aim of Leading by Example under the Strategic Plan theme of Caring for our Environment.

* CO2e, or carbon dioxide equivalent, is a standard unit for measuring carbon footprints.

Financial

Market engagement has confirmed that HVO costs some 15% to 26% more per litre than fossil-fuel diesel, so switching fuels will not produce a direct operational cost saving. Both fossil diesel and HVO are subject to regular variations in price and the cost differential is therefore not a certainty. Accordingly, and for the purposes of costing this initiative the mid-range price for this fuel, £1.20/litre, has been used.

At the point of writing this report, seventy-nine of the two hundred and forty-six diesel vehicles in the Council's fleet can run on HVO. In terms of the immediate cost, if implemented from 1 January 2022 for just those vehicles currently compatible with HVO,

there would be an additional cost of fuel for the remainder of 2021/22 of approximately £13,000.

The annual cost for running all 246 diesel vehicles on HVO would result in an additional fuel cost of approximately £174,000 per year. While this is a significant additional service cost, in terms of the carbon saving achieved, it represents the greatest carbon saving possible per £ spent and will reduce the Council's fleet carbon emissions by 90.7%, once the entire fleet is migrated to HVO.

Table 1. Cost of diesel consumed by fleet (2020/21) and projected cost of HVO by entire
fleet. ** Based on figures supplied by East Suffolk Norse.

		Total cost of		Additional
		diesel	Projected	full year
		(20/21	annual cost of	cost of
		costs,	HVO fuel at mid	HVO fuel
Quantity of	Average diesel	rounded to	price point	
diesel consumed	price per litre	nearest	(rounded to	
(litres) (20/21)**	(20/21)	£1000)	nearest £1000)	
829,745	£0.99	£822,000	£996,000	£174,000

The need to install additional bulk HVO fuel storage tanks is under investigation. However, it already seems likely that it will be possible to use the existing bulk diesel storage tanks for HVO immediately. If this is possible, then the remaining older diesel vehicles that cannot be run on HVO will use fuel cards to obtain conventional diesel at local filling stations, until they are removed from the fleet.

In terms of the fleet replacement, this is currently under review. A 'route and tasking' review is planned for the refuse fleet, which may see it being reduced in size, at least temporarily until the implications of the Government's new waste strategy becomes clear. The Housing fleet is also being reviewed because of the move to a more mobile way of working and potentially a different vehicle profile being required.

Should additional separate HVO bulk storage tanks be required then two 50,000 litre storage tanks will be needed, one at each of the Ufford and Lowestoft depots.

Human Resources:
None.
ICT:
None.
Legal:
None.
Risk:
There are two significant risks:
Financial Impact
The main risk is the possible variation in the unit price of HVO (fossil diesel is also subject to constant variation in price). The risk of variation in the price of HVO can be mitigated through careful procurement and the setting up of a 3-year contract to give a longer-term cost certainty.

Security of Supply

The risk of disruption to the supply of HVO is considered low as the main HVO manufacturers are increasing their non-palm oil sources of vegetable oil, as a result of the EU Renewable Energy Directive aiming to ban all palm oil in biofuels by 2030. This risk will however be mitigated further through the completion of a firm contract for supply. Additionally, should an extreme event occur then because HVO can be used without the need for any engine adaptation the vehicles can switch back to using conventional fossil diesel until the supply of HVO resumes.

External Consultees:	Norse.
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Strategic Plan Priorities

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

XXX	Governance				
XXX	How ESC governs itself as an authority		\square		
How does this proposal support the priorities selected?					
This project will deliver the strategic objectives set out above by:					
 Making an immediate positive impact on the Council's carbon emissions by substantially reducing the most heavily polluting area of the Council's activity. Making a significant advance in the Council's commitment towards its ambition of becoming a carbon neutral Council by 2030. 					
i	Enabling the Council to demonstrate that it is leading by example by migrating two of its key front-line services to the use of a less carbon polluting fuel, whilst promoting wider environmental responsibility by ensuring that the fuel is palm oil free.				

Background and Justification for Recommendation

1	Background facts				
1.1	In July 2019 the Council declared its recognition of the climate emergency and committed to put the environment at the heart of everything it does. It also pledged to become a carbon neutral Council by 2030.				
1.2	In 2020/21 the Council's diesel fleet of some two hundred and forty-six vehicles, including its 48 heavy goods refuse lorries, accounted for approximately 44% (2230tCO ₂ e) of the Council's total carbon emissions (5105.2tCO ₂ e).				
	 The breakdown of the emissions arising from the diesel fleet were as follows: Refuse: 1669tCO₂e; 75% of fleet emissions Streets: 213tCO₂e; 9% of fleet emissions Housing: 148 tCO₂e; 7% of fleet emissions Facilities management: 72 tCO₂e; 3% of fleet emissions All other diesel fleet (car parks, building cleansing, environmental enforcement, facilities management, dock, workshop, and pool cars) made up the remaining 6%. 				
1.3	 Based on information provided by East Suffolk Norse relating to the Euro ratings of, and diesel consumption by, the vehicles of the fleet, Table 2 below outlines the consumption of diesel by, and the tonnes of CO₂ equivalent emissions arising from our diesel-powered fleet. Table 2. Diesel consumption and emissions by Euro 6 vehicles and all remaining non-Euro 6 vehicles (2020/21). 				
L					

No. of	Diesel	Scope 1 Emissions
vehicles	consumed (L)	(tCO ₂ e)

		Euro 6	79	471,371	1,267	
		Non-				
		Euro 6	167	358,374	963	
		Grand				
		total	246	829,745	2,230	
 Vehicles rated Euro 5 or under tend to be lighter vehicles that consume less Of the 48 HGVs on the fleet, 29 (60%) are Euro 6 standard, 18 are Euro 5 are 1 is Euro 4. The nineteen Euro 4 and Euro 5 HGVs are expected to be deleted from the replaced with Euro 6-engined vehicles within the next 9-12 months. Collect these nineteen vehicles accounted for 64% of all diesel consumption by not vehicles in 20/21. A proportion of the non-Euro 6 'light' fleet will also be replaced over this per and a timetable will also be produced for the replacement of the remainder 			nd only fleet or tively, n-Euro 6 eriod			
1.4	fuel cons national on local in the co	sumption r Resource a authority r oming years	ates remain at 2 and Waste Strate ecycling and refu	020/21 levels. How egy (RAWS), it can b use collection servion mplications for the	in this report assume vever, in the context oe anticipated that do ces may change signi size and compositio	of the emands ficantly

2	Current position
2.1	The Council has considered the following lower-emission alternative options to fossil-fuel diesel to power its fleet: • Electrification • Biodiesel • Biogas • Hydrogen • Hydrotreated vegetable oil (HVO) The sections below summarise the positions regarding each of these sources of power in turn and their suitability for use by the Council.
2.2	ElectrificationIn 2020/21, East Suffolk Council purchased four electric vans and four electric cars for use in the delivery of the parking enforcement operation. As this work involves comparatively short trips and does not require the need to carry heavy goods, electrification is a suitable solution. A number of new electric charging points have been installed at the Ufford and the Lowestoft depots.In the same year the Council also purchased an electric pool car to support business travel by its Port Health operations in Felixstowe. This is supported by the installation of charging facilities at that site. These new electric vehicles are in

	addition to the electric pool car based at East Suffolk House since 2016/17.
	The biggest emitter of carbon and other greenhouse gases is the refuse collection heavy goods vehicle (RCV) fleet, which is responsible for 75% of the fleet emissions. Whilst electric cars and light vans are readily available, the real challenge is the availability of electric RCVs. This technology is still in its infancy.
	There is one model of electric RCV commercially available, which is the eCollect manufactured by Dennis Eagle. The costs of this vehicle are 40-80% greater than the conventional diesel engine version from the same manufacturer. However, the costs of the electricity to power the vehicle are claimed to be around a third of the costs of powering the diesel-fuelled equivalent, with additional savings in the form of zero vehicle excise duty and reduced servicing costs. It should be noted that there is no guarantee that electric vehicles would continue to benefit from zero vehicle excise duty in the longer term, particularly once electric vehicles come to dominate the national fleet. There would also be additional costs in the form of suitable electric vehicle charging points and associated infrastructure at depots.
	There are no appropriate technical performance details of the electric Refuse Collection Vehicle offered by Dennis Eagle. There are trials occurring across the country, notably the City of London, however, these are predominantly in urban areas which do not facilitate a close comparison with the long distances that need to be travelled in a mixed urban/rural district such as East Suffolk. A trial of an electric vehicle has been requested from Dennis Eagle, which we are hoping will be provided in September this year, to enable the Council to explore the application of this technology in this district.
	Due to the lack of performance data for these electric RCVs, there is currently considerable doubt that this would be a viable alternative for ESC to pursue, given the critical requirement to maintain an effective and efficient refuse collection service.
2.3	Biodiesel (FAME) Biodiesel otherwise known as Fatty Acid Methyl Ester (FAME) is a diesel fuel replacement produced from plant/vegetable oils. Such oils cannot be blended directly with conventional diesel without further chemical treatment. The norm in the UK is to blend biofuels to a maximum of 7% of the total fuel.
	Plant/vegetable oils may come from a variety of sources, such as oilseed rape, soy and palm, used cooking oils (UCO) and waste oils. Depending on the provenance, the biofuel can save around 50-60% of the emissions resulting from a ULS (ultra- low sulphur) diesel fuel. However, there are other issues associated with biodiesels.
	 Palm oil-based fuels block the vehicle's filters. Biodiesel can oxidise and turn rancid if left too long in a storage tank. Biodiesels have a corrosive effect on rubber components of vehicles' engines. Doubt remains over the traceability of the UCO sourced from outside Europe.

	• The main issue is the likelihood that biodiesel contains palm oil, even if from a waste cooking oil source. Whilst it offers a cheap and versatile feedstock the environmental and ecological impact related to its cultivation has increasingly brought its sustainability and long-term suitability into question.
	For the reasons above, biodiesel in this form has not been considered as a suitable alternative fuel at the current time.
2.4	Hydrogen
	There is considerable interest in the potential for hydrogen as an alternative fuel for both the Council's fleet and buildings. An increasing number of companies, including EDF – currently in the planning stages of the Sizewell C project – are considering the use of Hydrogen for their construction and logistics fleet, to drive down the carbon emissions of the build. Hydrogen could be produced on/near to site and is a zero-emissions fuel at the point of use. Companies such as JCB are developing hydrogen power units for use in future generations of their vehicles. This bodes well for this technology.
	The potential hydrogen economy offers East Suffolk a significant sustainable growth opportunity, supporting a wider ambition for the area to become carbon neutral, and a home for renewable energy innovation.
	However, it should be noted that hydrogen power is in its early stages of development. A suitable hydrogen engine is not yet available on the market, and no manufacturers of refuse collection vehicles (which account for 75% of the council's fleet emissions) are producing a vehicle powered by this fuel. Therefore, while monitoring of the development of this technology will continue, the Council may need to wait five or more years before the technology is available in a suitable form.
2.5	Hydrotreated Vegetable Oil (HVO)
	HVO is the recommended alternative fuel option. It is an alternative way to produce high-quality biobased diesel fuels without compromising fuel storage, engines, exhaust aftertreatment devices, or exhaust emissions. These fuels are colloquially referred to as "renewable diesel fuels" instead of "biodiesel". HVOs are mixtures of fully saturated hydrocarbons and are free of sulphur and aromatics, unlike fossil diesel.
	HVO is a 'drop-in' fuel, which means that it can be substituted, at any ratio, for, or with, conventional fossil fuel diesel in compatible engines (i.e. engines rated to Euro 6 standard) with no impact on operational requirements. This enables an immediate migration of Euro 6 compliant vehicles to HVO.
2.6	HVO lowers overall life cycle greenhouse gas emissions by up to 90% depending on the blend, with most of the emissions reduction coming from the uptake of CO ₂ from the atmosphere whilst the feedstock is growing.

2.7 Carbon footprint of HVO

The Department for Business, Energy and Industrial Strategy (BEIS) have recently published official conversion factors (CFs) that can be applied to the consumption of "biodiesel HVO" to calculate the emissions arising from its use. 2021 is the first year for which official government CFs for HVO have become available. Greenhouse gas reporting: conversion factors 2021 - GOV.UK (www.gov.uk)

As with any CF, there is potential for future variation in the value of the conversion factors as BEIS develop and improve their methodology for calculating these values, and as real differences in the carbon impacts of different fuel and energies are reflected. However, given the considerably lower rate of emissions as compared to diesel, it would require an increase in the CFs for HVO of well over 1000% from the 2021 values to eliminate the carbon saving benefits of undergoing the transition proposed.

Impact of migration to HVO on fleet and corporate emissions

The following estimates of the carbon savings likely to arise from the migration to HVO apply the relevant CFs to the estimated consumption of HVO and to the estimated residual consumption of diesel. Calculations of the overall reduction in the Council's carbon footprint made during the migration are made against the 19/20 total.

If the migration to HVO commences with current compatible vehicles from 1 January 2022, an emission saving of $287tCO_2e$ could be realised during Q4 21/22 alone. This would be a 12.9% reduction on the fleet's emissions, and a 4.6% reduction on the Council's emissions.

This equates to an emission saving of approximately $1150tCO_2e$ in the first full year (2022/23) following the migration of this initial cohort of current compatible vehicles to HVO fuel. As a proportion of measured emissions within the scope of the 2020/21 greenhouse gas report, this equates to, 51.6% of the whole fleet emissions, and 18.3% of the entire council's emissions.

When the remaining Euro 4 and Euro 5 HGVs are migrated, which is expected to take place by the end of 2022/23, this would bring the total emissions saving up to $1711tCO_2e$, equal to 77% of total fleet emissions and 27.2% of the council's carbon footprint.

Once the entire fleet has eventually migrated to Euro 6-engined vehicles, the emissions saving would be 2023tCO₂e. This would be 90.7% of all fleet emissions, and 32.1% of the Council's total emissions.

Chart 1 shows the estimated fleet emissions during the migration to HVO.



How to address the current situation
There are several possible routes to the procurement of HVO. Frameworks exist e.g. the central government's Crown Commercial Service (CCS). CCS also have a reverse auction option run quarterly which aggregates all needs and can leverage better pricing. The Council can also opt to purchase directly or utilise the supply chain of our fleet management partner Norse. The main emphasis in a procurement will be in gaining security of supply and stability of price for the long term as the HVO market is relatively new and as more clients convert, it is possible that prices could increase with demand.
The other potential procurement requirement will be the purchase and installation of two additional bulk fuel storage tanks for the fleet, one per depot. If required, the cost is estimated to be circa £50,000 per tank plus a total installation cost of a further circa £50,000. Total £150,000. If required, delivery and installation of the bulk tanks would be approximately 12 weeks from award of contract. Tanks of this type are available with a 10-year manufacturer's guarantee.

However, a feasibility study will be undertaken to determine whether the existing storage tanks can be used for HVO fuel. If they can, then the £150,000 will not be drawn down from the capital fund. If existing diesel tanks are used for HVO, then the remaining vehicles that are not able to run on the new fuel will be fuelled at forecourt pumps using fuel cards, until the time that they are replaced or deleted from the fleet.

- 3.3 Discussions have been held with key fuel suppliers. There is a plentiful supply of HVO base feedstock i.e. used cooking oil. However, it has been the processing plants that are needed to convert it to HVO that has limited production. To cope with this and satisfy the large continental market, recently significant traditional oil refining capacity has been converted to HVO production. This has led to an increase in refining capacity of more than 40% in the last five years.
- 3.4 To enable accurate monitoring of the impact of this proposal in terms of a reduction in the Council's carbon emissions, our operational partners East Suffolk Norse will be given a specific instruction to ensure the stringent and separate keeping of records of consumption of both fossil-fuel derived diesel, and HVO, for each individual vehicle, to enable accurate calculations of the resultant greenhouse gas emissions. Norse already record and supply data on the consumption of diesel, including diesel purchased using fuel cards at filling stations, for each vehicle on the wider fleet for this purpose.

4 **Reasons for recommendation** 4.1 The recommended action would allow the immediate migration of a significant element of the Council's diesel fleet from fossil-fuel derived diesel to Hydrotreated Vegetable Oil. 4.2 With more vehicles migrated to HVO in subsequent years, this migration has the potential to ultimately reduce the annual carbon emissions associated with the fleet by approximately 90.7% and reduce the council's total carbon emissions by around 32.1% against 19/20 levels, once the migration of the entire fleet to HVO is complete. 4.3 The advantage of HVO as a drop-in fuel requiring no modifications to the existing compatible fleet confers the ability to revert to the use of conventional diesel if required. This would safeguard the continuation of the Council's operations, for example, in the event of disruption to the supply of HVO fuel. 4.4 These recommendations present a cost-effective opportunity to achieve significant and immediate progress towards carbon neutrality.

Appendices

Appendices:

None.

Background reference papers:

None.

Agenda Item 9 ES/0867



CABINET

Tuesday, 07 September 2021

Subject	Infrastructure Funding Statement 2020-21 and CIL Funding Bids
Report by	Councillor David Ritchie
	Cabinet Member with responsibility for Planning and Coastal Management
Supportin	Nicola Parrish
g Officers	Infrastructure Delivery Manager
	nicola.parrish@estsuffolk.gov.uk
	Ben Woolnough
	Planning Manager (Development Management)
	ben.woolnough@eastsuffolk.gov.uk

Is the report Open or Exempt? OPEN

Wards Affected:	All Wards

Purpose and high-level overview

Purpose of Report:

1. Cabinet to receive and note the Infrastructure Funding Statement (IFS) 2020-21, which comprises of the Community Infrastructure Levy (CIL) Report, the S106 Report, and the Infrastructure List and to approve this for publication. This is a statutory document, the content of which is prescribed under Regulation 121A and Schedule 2 of the CIL Regulations 2010 (as amended). This document is required to be published on the Council CIL webpages by 31 December 2021.

The IFS 2021-21 is attached as Appendix A to this report and has been reviewed by the CIL spending Working Group and is recommended for publication.

2. For Cabinet to approve the CIL Funding Bids received for essential infrastructure projects to support the Local Plans growth.

A detailed summary of the proposed CIL funding allocations to support the planned infrastructure projects is attached as Appendix B - CIL Funding Allocations 2021 to this Report. The CIL Spending Working Group have reviewed the proposed bids and make their recommendations within Appendix B. If planned infrastructure projects are not delivered in a timely manner this could make planned housing growth unsustainable.

Options:

Failure to produce and publish an annual Infrastructure Funding Statement would place the council in breach of the CIL Regulations. There is no alternative option.

Failure to approve the use of CIL Funds to support the delivery of planned infrastructure projects would make planned development unsupported and unstainable, increasing journeys for services (education, health waste) to alternative locations, reducing customer support/service and potential resulting in refusal of planning permissions in areas where there is insufficient infrastructure to support the planned growth. Other unintended impacts such as increased fly tipping, poorly educated children, undiagnosed health conditions, etc could also be linked to a failure to deliver infrastructure to support growth.

The CIL Spending Strategy allows for the following: where infrastructure projects do not yet meet the "valid" criteria for approval of CIL Funding, the CIL Spending Working Group have made recommendations to approve a maximum allocation of CIL funding "in principle" subject to outstanding documents, evidence and confirmation of planning permission being provided. In principle approval of CIL Funding allows the CIL funds to be ringfenced towards the project and once all necessary documentation and planning permissions have been obtained the project can proceed without the need for further approval of the CIL funding.
Recommendations:

- That the Infrastructure Funding Statement 2020-21 be approved for publication by 31 December 2021, subject to further minor financial amendments confirmed through the Deputy Cabinet Member for Planning and the Cabinet Member for Finance.
- 2. That the recommendations for allocating Community Infrastructure Levy funding towards the proposed infrastructure Projects as outlined in Appendix B be approved.

Corporate Impact Assessment

Governance:

The CIL Spending Working Group are responsible for the review of CIL Funding bids and for making recommendations to Cabinet for approval of the proposed CIL Funding allocations. The CIL Spending Working Group also review the content of the Infrastructure Funding Statement, which is set out through Regulation 121A and Schedule 2 of the CIL Regulations 2010 (as amended) and make the recommendation to publish this year's IFS.

ESC policies and strategies that directly apply to the proposal:

CIL spending Strategy 7 January 2020

East Suffolk Council - Waveney Local Plan

East Suffolk Council - Suffolk Coastal Local Plan

East Suffolk Strategic Plan Objectives: -

- Economy Support and Deliver Infrastructure
- Communities Maximising health, well-being, and safety in our District
- Sustainable Optimising our financial investment and grant opportunities
- Transformation Effective use of data
- Environment Minimise Waste, reuse materials and increase recycling

Environmental:

The CIL Funding bid to expand and improve the provision of the household waste recycling centre and re-use shop at Foxhall Household Waste Recycling Centre directly meets the council's Strategic Environmental objectives to minimise waste, reuse materials and increase recycling. Other projects also allow for the expansion of education and health provision to support and make our communities healthier and resilient, for example, through the delivery of modern environmentally and energy efficient education buildings, and better use of technology and re-use of space to increase capacity for GP surgeries and widen the range of health services provided.

Equalities and Diversity:

Environmental Impact Assessment EQIA342826777 has been completed and submitted to the Communities Team for review.

There are no identified negative impacts on those with protected characteristics.

Financial:

The unallocated District CIL Fund on 1 April 2021 is £13,991,561.29, therefore there are sufficient District CIL Funds to fund the infrastructure projects that have requested District CIL Funding in the 2021 Bid Round.

Human Resources:

The proposals in this report do not have any Human Resources impacts.

ICT:

The Exacom Project, which will result in 'live time' developer contributions data being publicly available is making substantial progress with all CIL and Habitats Mitigation funds being managed via the back-office part if the Exacom management system. Currently the Infrastructure Team are adding the s106 historic data to the system. The project is still on target to have the Public Facing Module available for public use during 2022, subject to the reconciliation work and software updates being delivered within the next 12 months.

Legal:

There is a statutory requirement to report on Developer Contributions in line with the CIL Regulations 2010 (as amended).

Risk:

Failure to produce and publish an annual Infrastructure Funding Statement would place the council in breach of the CIL Regulations.

Failure to approve the use of CIL Funds to support the delivery of planned infrastructure projects would make planned development unsupported and unstainable, increasing journeys for services (education, health waste) to alternative locations, reducing customer support/service and potential resulting in refusal of planning permissions in areas where there is insufficient infrastructure to support the planned growth. Other unintended impacts such as increased fly tipping, poorly educated children, undiagnosed health conditions, etc could also be linked to a failure to deliver infrastructure to support growth.

Failure to invest funds from development towards improved infrastructure could have other environmental impacts, such as increased journeys, inefficient buildings, and increased waste.

External Consultees:	None.
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Strategic Plan Priorities

Select the priorities of the <u>Strategic Plan</u> which are supported by this proposal:			Secondar y
(Sele	ct only one primary and as many secondary as appropriate)	priority	priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk		\boxtimes
P02	Attract and stimulate inward investment		\boxtimes
P03	Maximise and grow the unique selling points of East Suffolk		
P04	Business partnerships		\boxtimes
P05	Support and deliver infrastructure		\boxtimes
T02	Enabling our Communities		
P06	Community Partnerships		\boxtimes
P07	Taking positive action on what matters most		\boxtimes
P08	Maximising health, well-being and safety in our District		\boxtimes
P09	Community Pride		\boxtimes
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services		
P11	Making best use of and investing in our assets		
P12	Being commercially astute		
P13	Optimising our financial investments and grant opportunities		\boxtimes
P14	Review service delivery with partners		\boxtimes
T04	4 Delivering Digital Transformation		
P15	Digital by default		\boxtimes
P16	Lean and efficient streamlined services		
P17	Effective use of data		\boxtimes
P18	Skills and training		\boxtimes
P19	District-wide digital infrastructure		\boxtimes
T05	Caring for our Environment		
P20	Lead by example		\boxtimes
P21	Minimise waste, reuse materials, increase recycling		\boxtimes
P22	Renewable energy		
P23	Protection, education and influence		\boxtimes
XXX	Governance		
XXX	How ESC governs itself as an authority	\boxtimes	

How does this proposal support the priorities selected?

The use of developer contributions for supporting the delivery of the proposed infrastructure projects helps to meet several the corporate objects. The projects to be funded from CIL range from increasing recycling and reuse of domestic waste, improving education provision, improving health provision and welfare, and providing more options for sporting activities. New buildings and facilities will also need to meet sustainability and efficiency targets set out within Building Regulations, together with access requirements for those with disabilities.

The expansion of education, sports, recycling and health facilities supports our communities to live sustainably, work, learn and develop and be healthy. By expanding

and providing new facilities locally in areas of growth it also reduces the need for people to travel further for these services.

The continued work on the Exacom Developer Contributions Project will support transformation, transparency, and electronic reporting, which will support the publication of the IFS in future years and demonstrate the golden thread between the Local Plan growth and the delivery of infrastructure.

The publication of the IFS 202-21 supports the Councils corporate governance requirements by complying with the CIL Regulations 2010 (as amended). It is a statutory requirement to produce the IFS annually and publish it by the 31 December, following the end of the reported financial year.

Background and Justification for Recommendation

1	Background facts
1.1	There is a statutory requirement to report on Developer Contributions in line with the CIL Regulations 2010 (as amended).
1.2	When the local Plan is developed, all statutory infrastructure providers are required to be consulted and to provide details of the estimated costs and projects required to support then planned growth. This also includes the proposed timing of projects. These projects which form part of the East Suffolk Local Plan Infrastructure Delivery Framework are now subject to annual review and are included in the Infrastructure Funding Statement (IFS). This document provides the most current details of proposed projects, costings, and timescales for delivery over the plan period. The IFS also allows for newly identified projects emerging from local plans to be captured and for projects that are no longer required to be marked as such and subsequently removed from the IFS in future years. Some of the projects offer continued delivery of the service/use of the facility well beyond the Local Plan period.

2	Current position
2.1	The IFS reports on the period 2020-21 and is also forwards looking in terms of the Infrastructure List.
2.2	The proposed CIL Funded projects are planned, short term, infrastructure projects which, when delivered, will make the housing developments that are newly completed, are currently under construction, and those with recently granted planning permissions, sustainable.

3	How to address current situation
3.1	Approve the IFS for publication prior to 31 December 2021.
3.2	Approve the recommendations for CIL funding for the listed infrastructure projects.

4	Reason/s for recommendations
4.1	To meet statutory requirements.
4.2	To deliver sustainable growth.

Appendices

Appendices:		
Appendix A The Infrastructure Funding Statement 2020-21		
Appendix B District CIL Funding Allocations 2021		

Background reference papers:		
Date	Туре	Available From
7 January 2020	CIL Spending Strategy	Community-Infrastructure-Levy- Spending-Strategy.pdf (eastsuffolk.gov.uk)

Agenda Item 9 ES/0867



Infrastructure Funding Statement 2020-21



1. Introduction

- 1.1. Welcome to East Suffolk Council's Infrastructure Funding Statement (IFS) for 2020-21. This document includes a summary of the activities in relation to developer contribution income and expenditure for the 2020-21 financial year.
- 1.2. Reporting on developer contributions helps local communities and developers see how contributions have been spent and understand what future funds will be spent on, ensuring a transparent and accountable system.
- 1.3. In accordance with the Community Infrastructure Levy Regulations (CIL Regs) any authority that receives a contribution from development through the levy or section 106 planning obligations must prepare an infrastructure funding statement. This includes county councils.
- 1.4. This is the second Infrastructure Funding Statement for East Suffolk and it is likely that the format and content will change in future editions as technology to deliver digital reporting is further enabled. East Suffolk are working with MHCLG on making Local Plans more accessible and are continuing to work towards the live developer contributions system.
- 1.5. There are currently two CIL charging schedules for East Suffolk, one covering the Waveney area and the other covering the Suffolk Coastal area. The IFS reports on developer contributions across the whole of the East Suffolk area singularly.

2. Legislative Requirements

- 2.1. Regulation 121A. of the CIL Regs requires that the Infrastructure Funding Statement be published on the Councils website no later than 31 December in each calendar year.
- 2.2. In compliance with Regulation 121A the annual infrastructure statement includes:
 - (a) "the Infrastructure List" a statement of the infrastructure projects or types of infrastructure which the charging authority intends will be, or may be, wholly or partly funded by CIL. This Infrastructure List must not include the projects where Neighbourhood CIL that has been subject to clawback or projects where the Council is holding Neighbourhood CIL on behalf of an unparished area;
 - (b) "the CIL Report" a report about CIL, in relation to the previous financial year ("the reported year"), which includes the matters specified in paragraph 1 of Schedule 2 of the CIL Regs; and
 - (c) "the Section 106 Report" a report about planning obligations, in relation to the reported year, which includes the matters specified in paragraph 3 of Schedule 2 of the CIL Regs and which may also include estimated values of expected contributions where the actual value is not yet known.

3. Contents of the Infrastructure List

- 3.1. The focus of developer contributions is to deliver sustainable development and to mitigate the effects of development. The Infrastructure Delivery Frameworks appended to the Waveney and Suffolk Coastal Local Plans form the bedrock of the identification of infrastructure to support development and show the first considerations of how the critical, essential and desirable infrastructure may be funded and the period in which it may be delivered. The Infrastructure List takes this information a step further a begins to express those projects which the council is looking to support delivery of in the short, medium and longer term, through the allocation of District CIL, through the collection and use of s106 contributions or through planning conditions (such as highways works).
- 3.2. The Infrastructure List replaces the duty on Councils to publish CIL Regulation 123 lists. These lists were previously required for CIL charging authorities in order to confirm the types of infrastructure which would be funded through CIL rather than s.106. The requirement for the 123 lists was removed in September 2019 and replaced with the requirement for the Infrastructure Funding Statement. This Infrastructure List therefore covers specific infrastructure projects which may be funded by CIL or s106 or both and the general (not project specific) types of infrastructure which may be funded through CIL or s106 or both.
- 3.3. As East Suffolk is a plan led authority with two up-to-date local plans, the vast majority of infrastructure needs have previously been identified and the type of developer contribution has been considered and established in the list. However, unplanned sites may come forward with their own new or additional infrastructure demands. Also, unidentified infrastructure needs may materialise over the plan period or as a result of more up to date knowledge of allocated sites. Therefore, the generic infrastructure list covers the various types of infrastructure and a guide on how they may be funded.
- 3.4. The Infrastructure List will be regularly reviewed and updated as the estimated costs of infrastructure projects are better understood, and other funding sources are clarified. The Infrastructure List will indicate the projects that are in progress and the projects that have been completed and will provide clarity and transparency around the delivery of infrastructure.
- 3.5. The infrastructure projects that have CIL and s106 allocated to them will be recorded and monitored within the Councils Exacom database. A project to provide this data digitally to the public via the Councils webpages is now at an advanced stage. This will enable "live time" reporting on projected CIL income, the amount of CIL and s106 funds received and the allocation of CIL and s06 funds to deliver infrastructure projects and the Neighbourhood CIL paid to the Town and Parish Councils. This is anticipated to be available during 2022.
- 3.6. A separate breakdown is provided of all CIL funded projects and their end of financial year 2020-21 status of delivery for quick reference.

4. Delivering Affordable Homes

- 4.
- 4.1. The National Planning Policy Framework requires Local Planning Authorities to reflect the needs for affordable housing within their planning policies.
- 4.2. Policies in the Local Plans require development (with capacity for eleven units or more in the Waveney Local Plan area and ten units or more in Suffolk Coastal Local Plan area) to make provision for affordable dwellings. Across East Suffolk viability testing has identified that affordable housing can be provided on viable sites in the range of 20%-40% as a proportion of homes, dependent on location. The Waveney Local Plan and emerging Suffolk Coastal Local Plan reflect the relevant evidence for the area. The policies expect provision to be made on-site, other than in exceptional circumstances. In such cases it may be agreed that a commuted sum could be paid towards provision of affordable housing off-site.
- 4.3. Planning obligations secured through s106 (legal) agreements are used in relation to securing onsite affordable housing or off-site contributions in lieu of affordable housing provision. Historic legal agreements providing for affordable housing contributions may restrict the location in which the contribution is spent to deliver affordable homes. Focus is given to delivering affordable homes in areas of greatest need.
- 4.4. Affordable Homes that are secured through s106 are not infrastructure and therefore are not reported through the infrastructure List. Information on the delivery of Affordable Homes is included in the annual monitoring report.

5. Reviewing the CIL Rates

- 5.
- 5.1. In order to ensure that the Councils CIL Charging Schedules remain appropriate and effective, a review of CIL is currently in progress with a view to having a single East Suffolk CIL Charging Schedule that reflects the latest viability evidence to support the CIL rates.
- 5.2. The Council has commissioned consultancy Aspinall Verdi, who prepared the Viability Assessments that underpin the adopted Waveney Local Plan and the Suffolk Coastal Local Plan, to prepare the evidence base to inform the draft East Suffolk CIL Charging Schedule. There will be consultation on the draft CIL Charging Schedule, including a formal period of consultation in 2021, to be followed by independent examination and then adoption. The Council's website East Suffolk CIL Charging Schedule » East Suffolk Council details the stages and progress of this work.

6. Photo Gallery – Projects delivered with the support of CIL

6.1. Photographs of infrastructure projects that have been funded through Strategic CIL.

7. Appendices

The CIL Report

The s106 Report

1. CIL Charging Schedules

- 1.1. East Suffolk Council currently has two CIL Charging Schedules: a Waveney Area CIL Charging Schedule effective since 1 August 2013, and a Suffolk Coastal Area CIL Charging Schedule effective since 13 July 2015.
- 1.2. A review of the East Suffolk area viability and the CIL rates is in progress and consultation on the Draft East Suffolk CIL Charging Schedule will open in autumn 2021.

2. CIL Allocations

- 2.1. CIL is paid on commencement of planning permissions that are CIL liable development. Payments are usually made in instalments and can take up to 2 years to be received in full. Once received, the CIL payments are automatically split down into their statutory "pots" or funds:
 - 5% CIL Admin Retained by the Council to fund the administration of the CIL function;
 - 15%* or 25% **Neighbourhood CIL (NCIL)** Distributed to parish councils *Where town or parish councils do not have a made Neighbourhood Plan the 15% is capped at £100 (indexed) per council tax dwelling. Where there is no parish council then the NCIL amount is retained for spending only in that parish area.
 - The remainder (80% or 70%) is **District CIL** to be spent on Infrastructure needs for the District as a whole. Sometimes District CIL is called 'Strategic CIL'.

3. CIL Income

- 3.1. East Suffolk Council issued 159 CIL Demand Notices during the 2020-21 financial year totalling £15,624,259.35 and during this period the Council received £ 6,553,773.07 in total CIL (Admin, Neighbourhood CIL (NCIL) and District CIL combined). Some of the Demand Notices have been issued to replace historic invoices as CIL is managed through the new Exacom developer contributions system. The amount of CIL requested relating to Demand Notices specifically issued for development that commenced in 2020-21 is £9,205,132.87. The CIL demanded figure is therefore likely to be a lower value in the 2021-22 financial year, depending on the nature and size of developments commencing in 2021-22. The total amount of CIL received by East Suffolk Council up to the 31 March 2021 is £20,969,084.84. With the introduction of the new management system, bank interest of £122,712.80, for previous years up to 31 March 2021, has been added and this gives a total CIL received figure of £21,091,797.64.
 - 3.2. The total amount of CIL receipts, collected by East Suffolk prior to 1 April 2020 was £14,415,311.77.

4. Brought forward balances

4.1. Table 1 shows the amount of Neighbourhood CIL (NCIL) for Parish Meeting Areas (£15.44) that was carried over into the 2020-21 financial year which is not yet allocated to infrastructure projects by East Suffolk in areas where there is no parish council. The total of Neighbourhood CIL received between 1 October 2019 and 31 March 2020 is also listed in this table as it is not allocated and paid out until after the 2019-20 financial year end. The amount of NCIL is not confirmed until verified year-end figures are available, after the end of the financial year. CIL admin was assessed, allocated and spent at the end of 31 March 2019 and so this does not show as a bought forward figure at the start of 2020-21 financial year. See Table 3 for this years CIL Admin allocation and spend.

Table 1

Type of CIL	£
NCIL held for Parish Meeting Areas	15.44
Unallocated NCIL received during 2019-20 and	344,312.67
allocated and/or paid as April 2020 NCIL Payment	
Unallocated District CIL carried forward into 2020-21	8,852,994.21
Total CIL brought forward into 2020-21	9,197,322.32

4.2. District CIL, is collected for larger infrastructure projects which support the new development identified in the local plans. Regular conversations are held with Health and Education, Highways, Waste and other infrastructure providers to ensure essential infrastructure projects are delivered to support growth in East Suffolk.

5. Allocating CIL collected before 1 April 2020

5.1. Table 2 provides details of the CIL which was collected by the authority before the end of 2019-20 that has been allocated during the 2020-21 financial year and is not yet spent.

Table 2

Approved Allocation £	Spend Notes
30,000.00	Capital works have been
	completed during 2021
	NCIL spend is reported by
344,312.67	the Town and Parish
	Councils
374,312,67	
	30,000.00

- 5.2. A full breakdown of infrastructure projects that have been allocated Strategic CIL is provided via the CIL Spending webpage. This data also provides information on the project status and the position of spend, including underspends against the CIL allocation which are credited back to the District CIL Fund.
- 5.3. As at the 31 March 2020, £1,830,540.50 of District CIL has been approved to be allocated to projects. 11 Projects have been completed and the remaining 8 projects have an unspent balance of £777,340.50.
- 5.4. Very little District CIL was allocated in 2019-20 due to a pause in most spending to allow for the creation of East Suffolk Council and a subsequent CIL Spending Strategy. This was enabled through the formation of the Major Sites and Infrastructure Team and increased resources for the administration of CIL. The CIL Spending Strategy was adopted by Cabinet in January 2020 and it established a clear approach to CIL spending commencing in 2020-21.
- 5.5. At the end of the 2019-20 financial year, the closing balance for District CIL was £8,852,994.21 and this is the amount of Strategic CIL that is available for allocation to infrastructure projects during 2020-21.

6. Allocating CIL collected between 1 April 2020 and 31 March 2021

6.1. Table 3 shows CIL collected during 2020-21 and allocated during 2020-21

Table 3

Allocation	Approved Allocation £	Spend Notes
CIL Admin (including 5% of total	333,819.29	Salary costs of the
accumulated interest)		Infrastructure Team,
		training costs, IT software
		costs and licenses, CIL
		Charging Schedule review
		costs
NCIL held for Parish Meeting Areas	3,360.48	
NCIL Payment October 2020 (CIL		NCIL spend is reported by
collected between 1 April 2020 and	665,565.81	the Town and Parish
30 September 2020)		Councils
Accumulated interest added to	116,577.16	Added to District CIL fund
District CIL Fund		on 31 March 2021
Total	1,119,322.74	

- **6.2.** Admin CIL is allocated for spending against the Infrastructure Teams operational costs incurred within the reported year. The amount of Admin CIL received for 2020-21 financial year is £327,683.65, represents 5% of the total CIL received for the financial year.
- 6.3. Neighbourhood CIL collected between 1 October 2020 and 31 March 2021, was allocated to town and parish councils and to Parish Meetings by 28 April 2021 and then amounts were paid to the relevant town and parish councils after the end of the reported financial year. For information, this allocated figure is £535,592.42 (including parish meetings allocations) and a summary of payments of £531,920.72 made to the relevant town and parish councils for the April 2021 allocation can be found via the <u>CIL reporting webpage</u>.

7. Other Matters

- 7.1. To date CIL has not been used re repay borrowing to deliver infrastructure.
- 7.2. CIL has not been spent in areas where there is no parish area as the amount collected to date is £7,047.62.
- 7.3. No Land payments in lieu of CIL have been accepted in 2020-21.
- 7.4. To date no clawback notices in accordance with regulation 59E have been issued where Town and Parish Councils have failed to spend their Neighbourhood CIL within the 5-year statutory period. In 2021-22, where resources allow, we will be looking at the level and type of spend for Neighbourhood CIL and issuing clawback notices, as appropriate.
- 7.5. Where large infrastructure projects that are delivered by statutory providers are in the latter stages of development and applications for CIL funding are presented for validation, the ringfencing of Strategic CIL will be approved by the CIL Spending Working Group, pending finalisation and final approval and allocation of project funding as projects reach delivery stage.
- 7.6. The CIL Spending Strategy approved in January 2020 is available on the <u>CIL spending</u> webpage. This webpage also provides information on the progress of projects and a link to photographs of some of the CIL funded infrastructure projects, during construction and at completion.
- 7.7. From April 2019 East Suffolk began using a new developer contributions management system. Once all CIL historic data has been entered and verified within the Exacom developer contributions system it will be possible to monitor CIL and s106 income, allocation and spending of developer contributions in live time via the Public Facing Module.
- 7.8. Beyond the 2020-21 financial year, the Covid-19 pandemic has continued to impact delivery of new housing and the infrastructure projects to support new development, for example

colleagues in Health have continued to focus on providing care and on the vaccination programme and some developers have experienced difficulties with supplies, finance and workforce. The CIL Regulations 2010 (as amended) were the subject of temporary change which will impact on the collection of CIL relating to CIL Demand Notices that have been issued in 2020-21 and earlier where there are liabilities and instalments still due for payment. For this reason, no forecasts of CIL Collection have been provided with this IFS. The public facing module of the developer contributions database will provide this information in live time in the latter part of 2022, when the system is launched into live mode and is available to the public.

8. 2020-21 Closing Balances

8.1. Table 4 shows the closing balances for unspent CIL at 31 March 2021.

Table 4

Fund	£	Notes
CIL Admin	0.00	Allocated and spent prior to 31.03.21
NCIL (Parish Meetings)	3,375.92	Funds held for Parish Meeting Areas
NCIL	535,592.42	This is allocated and transferred to town and parish councils, and allocated to parish meetings by 28 April 2021
District CIL (available)	13,991,561.29	The CIL Spending Working Group will be considering which projects are a priority for receiving CIL funding in September 2021.
District CIL (allocated to infrastructure projects and not yet spent)	1,025,656.20	See the full list of projects on the CIL Spending webpages
Total	15,556,185.83	

Contacts

Infrastructure Team East Suffolk Council 01502 523059 CIL@eastsuffolk.gov.uk

1. S106 Contributions in East Suffolk

- 1.1. The use of planning obligations secured through s106 (legal) agreements is generally in relation to securing onsite affordable housing, off-site contributions in lieu of affordable housing provision and site-specific mitigation required for new developments.
- 1.2. A s106 Agreement may also be used to secure contributions towards new schools (as these are not delivered through CIL) and may sometimes include s278 Highways mitigation works or contributions to secure highways improvements and green travel plans.
- 1.3. Whilst East Suffolk may be a lead party within a s106 Agreement, it is often the case that contributions are received directly by Suffolk County Council. Suffolk County Council will report on these s106 contributions, together the number of places secured, within the Suffolk County Council Infrastructure Funding Statement 2020-21.

Infrastructure Funding Statements | Suffolk County Council

1.4. Previously s106 income and expenditure will have been reported separately as Waveney and Suffolk Coastal s106 contributions. This s106 Report reports on all East Suffolk contributions which will include those previously collected as the former two authorities and Recreational Disturbance Avoidance & Mitigation Strategy payments (RAMS) collected under Section 111 of the Local Government Act 1972.

2. Sums received on or before 31 March 2020 that have not been allocated to projects by 31 March 2020

2.1. Table 1 shows the total amount of S106 money held by East Suffolk on 1 April 2020 (bought forward balances).

Table 1

Contribution Type	Amount £
East Suffolk RAMS (Habitat Mitigation)*	210,724.53
Former Waveney Open Space	103,764.71
Playing Fields	1,157.97
Affordable Housing	2,141,485.68
Former Suffolk Coastal Play space	508,009.61
Former Suffolk Coastal Sport	876,042.48
Community Facilities	297,977.32
Play Equipment	134,277.84
Refuse	21,404.01
Country Park (Woods Meadow)	203,225.81
Air Quality (Felixstowe South Reconfiguration)	7860.97
Landguard (Felixstowe Port S106)	215,047.63
Commuted sums for Maintenance**	£661,488.87
Total***	5,382,467.43

* RAMS contributions are collected under Habitats Assessment Regulations and required in line with the Recreational Disturbance Avoidance & Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils. RAMS contributions are automatically allocated to the RAMS project and will be spent to deliver strategic mitigation through the RAMS Executive Group. The figure reported above includes upfront payments made towards RAMS on planning applications approved prior to 1st April 2020 and S106 contributions paid prior to 1st April 2020. Further information can be found here:

http://www.eastsuffolk.gov.uk/planning/developer-contributions/rams/

** Commuted Maintenance sums are proportionately allocated over a 5 or 10-year period according to the requirements detailed within each legal agreement. The Commuted Sums for Maintenance brought forward figure in Table 1 is technically an allocated figure but has been included here in the interests of transparency.

*** Brought forward balances have been adjusted from those reported at year end last year as follows:

i. East Suffolk RAMS was formerly broken down into Waveney, Suffolk Coastal and East Suffolk. The figure has been amalgamated and corrected following data input into the new developer contributions database, enabling more accurate

reporting.

ii. Affordable Housing has been corrected with the addition of 39p omitted in error from the previous reported year.

iii. A medical facilities contribution reported in the previous reported year did not form part of the s106 contribution and therefore has been removed.

3. S106 Agreements entered into during 2020-21

- 3.1. The total amount of money to be provided under any planning obligations which were entered into during the reported year is £813,414.98. This figure includes the maximum amount (before indexation) expected where the total number of dwellings are not yet known, monies to be paid to other authorities and also includes a potential £145,992.00 in the event a contribution is paid in place of on-site provision.
- 3.2. The total number of affordable housing units to be provided under any planning obligation entered into during the reported year is 70. This figure includes the maximum number expected where the total number of dwellings are not yet known and includes a potential 4 units in the event on-site provision is provided and not a contribution.
- 3.3. There are no contributions for school places included in any planning obligations entered into during the reported year as funding for school places is sought through CIL.
- 3.4. A list of planning obligations entered into during the report year has been included below. Agreements can be viewed in full on the Council's website:

Planning Reference	Obligation Type	Number	Amount (£)
DC/20/1227/511	Restrictive	-	-
DC/20/1237/FUL	Habitat Mitigation Contribution	-	£321.22
DC/19/3966/FUL	Restrictive	-	-
DC/19/1511/FUL	Affordable Housing	5	-
	Affordable Housing	4* **	-
DC/10/2200/01/T	Affordable Housing	-	£145,992.00* **
DC/19/3289/OUT	Habitat Mitigation Contribution	-	£6,745.62*
	Affordable Housing	-	£10,428.00*
	Affordable Housing	8	-
	Ped/Cycle	-	£28,782.00
DC/19/1462/FUL	Public Open Space (on site)	-	-
	Habitat Mitigation Contribution	-	£8,351.72
	School Transport Contribution	-	£52,800.00
	Affordable Housing	11*	-

Planning Reference	Obligation Type	Number	Amount (£)
DC/19/4510/OUT	Habitat Mitigation Contribution	-	£10,600.26*
DC/20/1781/FUL	Restrictive	-	-
	School Transport Contribution	-	£6,025.00
DC/19/2513/FUL	Affordable Housing	-	£375,000.00
	Habitat Mitigation Contribution	-	£3,533.42
DC/20/1252/511	Habitat Mitigation Contribution	-	£4,818.30
DC/20/1352/FUL	Affordable Housing	-	£50,000.00
DC/20/2892/VOC	Habitat Mitigation Contribution	-	£8,532.30*
DC/20/3435/FUL	Habitat Mitigation Contribution	-	£1,927.32
DC/20/0951/FUL	Affordable Housing	31	-
DC/20/0951/FUL	Habitat Mitigation Contribution	-	£9,957.82
	Accessibility Payment	-	£60,000.00
DC/20/4646/FUL	Amenity Payment	-	£20,000.00
DC/20/1025/511	Affordable Housing	11	£0.00
DC/20/1035/FUL	School Transport Contribution	-	£9,600.00

* Denotes a maximum number/amount where number of dwellings is not yet known.

** Denotes an either/or obligation where only one or the other will be provided.

4. S106 Contributions Received in 2020-21

4.1. Table 2 shows the total amount of money under any planning obligation which was received by East Suffolk Council during 2020-21;

Contribution Type	Amount £
East Suffolk RAMS (Habitat Mitigation)	278,105.91
Former Waveney Open Space	1,331.71
Affordable Housing	382,252.07
Former Suffolk Coastal Play space	30,357.30
Former Suffolk Coastal Sport	30,017.56
Community Facilities (Woods Meadow)	36,664.34

Table 2

Play Equipment (Woods Meadow)	40,121.26
Total	798,850.15

5. S106 Allocations and Expenditure

- 5.1. The total amount of money under any planning obligations which was received prior to 2020-21 that has not been allocated by the end of the reported year is £3,736,800.38.
- 5.2. The total amount of money under any planning obligations which was allocated but not spent during 2020-21 is £391,590.53.
- 5.3. The total amount of money under any planning obligations which was spent during 2020-21 (including transferring it to another person, such as a Town or Parish Council, to spend) is £464,860.48.
- **5.4.** Table 3a shows 106 spend broken down and cross referenced to the planning reference source of funds. Where multiple small amounts have historically been pooled under the Open Space and Sport Policies, the planning application references have not been provided.

Spend Type	Project	Amount	Reference
	Basketball Posts	£1,924.33	Multiple
	Cricket equipment	£20,672.00	Multiple
	resurface the existing Tennis courts and the creation of a pay to play app/system	£8,750.00	Multiple
	refurbish football goal and replace play equipment.	£10,759.22	Multiple
	Table tennis table at Kirton Recreation Ground	£920.83	Multiple
	Martlesham Trim Trail	£10,370.50	Multiple
	Replacement tennis court fencing	£19,640.00	Multiple

Table 3a

	Multiplay structure	£10,465.63	Multiple
	additional play equipment	£5,854.85	Multiple
	replacement of large multi play unit	£1,000.00	Multiple
	Mound and Slide replacement with climbing tower	£15,590.00	Multiple
	Pedestrian Refuge installation	£9,225.00	Multiple
Former Suffolk Coastal Play and	resurfacing of play area	£244.00	Multiple
Sport	Fencing and benches at Tunstall Recreation Ground	£4,635.83	Multiple
	installation of a MUGA on the Tunstall recreation ground	£20,407.56	Multiple
	Westleton Boules Piste	£912.50	Multiple
	install additional sport and play equipment	£14,926.36	Multiple
	Play area improvements - Nightingale Road	£6,108.81	Multiple
	Play area improvements - Holton	£11,395.01	DC/13/0383/FUL
Waveney Play	Bungay Skate Park refurb	£1,083.68	DC/11/1378/CO U
and Open Space	Wildlife/events Noticeboards, The Denes	£2,028.00	DC/12/1521/FUL
	Play area improvements - Stoven Court	£15,102.35	DC/13/0649 &0650
	Noticeboards at Kirkley Cemetery	£1,728.86	W14617/2
Woods Meadow Country park	Country park enhancements	£27,467.40	DC/01/0977/OUT
Affordable Housing	Delivery of a 7 bedroom house of multiple occupation at 141 St Peters Street, Lowestoft	£102,930.05	DC/17/0633/FUL DC/15/2442/FUL

Other spend	Air Pollution	£396.00	Felixstowe South Reconfiguration
	Landguard – Felixstowe Port	£37,317.16	C03/2000
Commuted Sums – Open Space maintenance	Maintenance of multiple open space sites adopted by the Council	£103,004.55	Multiple
	Total	£464,860.48	

5.5. Table 3b shows 106 allocations broken down and cross referenced to the planning reference source of funds.

Table 3b

Proposed Spend Type	Project	Amount	Reference
Allocated but not	t spent during 2020-21		
WDC Play Equipment (Woods meadow)	Provision of play areas x 2 at Woods Meadow	£40,121.26	DC/01/0977/OUT
WDC Community Facilities (Woods Meadow)	Provision of Community Facilities at Woods Meadow (awaiting further funds before project progressed)	£36,664.34	DC/01/0977/OUT
	Resurface the existing Tennis courts and the creation of a pay to play app/system	£8,750.00	Multiple
	Framlingham Boules Piste	£7,056.40	Multiple
	Table Tennis Table - Framlingham	£1,470.00	Multiple
	Bowls Club - Peasenhall	£3,411.00	Multiple

	Additional play equipment - Snape	£4,150.45	Multiple	
SCDC Play and Sport	Install additional sport and play equipment - Witnesham	£10,073.64	Multiple	
	Former Deben High School - delivery of affordable housing	£219,893.44	C/07/1427/FUL C/13/1012/FUL	
Affordable Housing	Orwell Parham Scheme - delivery of 6 affordable rented homes, plots 10-15 DC/18/2212/FUL	£60,000.00	DC/15/1949/FUL	
	Total	£ 391,590.53		
Allocated prior to	2020-21 but not spent by the end of the	reported year		
Playing Fields	Playing Field due to be provided at Brooke Peninsula site (dependent upon development of site)	£1,157.97	DC/16/0892/FUL	
Waveney Play and Open Space	Lowestoft Active Seafront Project	£11,324.62	Multiple	
Country Park	Laying out of Woods Meadow Country park	£175,758.41	DC/01/0977/OUT	
Play Equipment	Provision of play areas x 2 at Woods Meadow	£134,277.84	DC/01/0977/OUT	
Community Facilities	Provision of Community Facilities at Woods Meadow (awaiting further funds before project progressed)	£132,977.32	DC/01/0977/OUT	
	New Play Area - Hollesley	£31,738.12		
SCDC Play and Sport	Skatepark Improvements Woodbridge	£15,000.00		
эрог	Multi use game area - Benhall	£4,835.74	Multiple	
	Recreation Ground - Heveningham	£3,326.74		
Other	Air Quality	£7,464.97	Felixstowe South Reconfiguration	
	Landguard – Felixstowe Port	£177,730.47	DC/03/2000	
Commuted Sums – Open	Maintenance of multiple open space sites adopted by the Council	£558,484.32	Multiple	

Space maintenance		
Total	£1,254,076.52	

- 5.6. S106 funds received under planning obligations have not been spent on repaying money borrowed, including any interest.
- 5.7. S106 funds received under planning obligations have not been spent in respect of monitoring (including reporting under regulation 121A) in relation to the delivery of planning obligations.
- 5.8. The Infrastructure Team have reviewed s106 monitoring fees for East Suffolk to ensure the income is sufficient to support delivery of timely and effective monitoring arrangements for s106, together with the provision of online, real time and transparent data to assist stakeholders to view collection and spend of developer contributions. East Suffolk Council approved the new monitoring fee which is chargeable from 1 April 2021.
- 5.9. Table 4 shows the total amount of money (received under any planning obligations and during any year that have been retained at the end of the 2020-21 financial year.

Contribution Type	Amount £
East Suffolk RAMS (Habitat Mitigation)	488,830.44
Former Waveney Open Space	67,649.71
Playing Fields	1,157.97
Affordable Housing	2,420,807.70
Former Suffolk Coastal Play space	482,129.90
Former Suffolk Coastal Sport	805,998.44
Community Facilities	334,641.66
Play Equipment	174,399.10
Refuse	21,404.01
Country Park (Woods Meadow)	175,758.41
Air Quality (Felixstowe South Reconfiguration)	7,464.97
Landguard (Felixstowe Port S106)	177,730.47
Commuted sums for Maintenance	558,484.32
Total	5,716,457.10

Table 4

6. Other Matters

- 6.1. Once all CIL historic data has been entered and verified in the Exacom developer contributions system it will be possible to monitor s106 contributions, allocation and spending in live time, as well as for the other developer contributions held by East Suffolk. It is currently only possible to report on s106 contributions in a limited fashion.
- 6.2. The Covid-19 pandemic has had a variety of impacts on the delivery of new housing and the infrastructure projects to support new development. For this reason, no forecasts of s106 contribution expected to be paid in 2021-22 have been provided with this s106 Report. It is expected that the system to show the public this information in 'live time' will be available via the East Suffolk Developer Contributions webpages during 2022.

<u>1. The CIL Regulations</u>

1.1. The CIL Regulations 2010 (as amended) were amended in September 2019, removing the Regulation 123 Lists. This Infrastructure List replaces the Regulation 123 Lists for Waveney and Suffolk Coastal areas and details the infrastructure projects that East Suffolk Council is intending to fund through developer contributions, together with other funding sources.

2. The Review of infrastructure Needs

The Infrastructure List has been developed through the ongoing review of infrastructure needs originally identified through the development of the Waveney and Suffolk Coastal Local Plans. Each Local Plan includes an Infrastructure Delivery Framework. Discussions have taken place with the statutory bodies providing services such as Police, Health, Educations, Highways in order to review the infrastructure needs and funding arrangements for the projects as they come forward for delivery.

3. Annual Review

The Infrastructure List is subject to annual review to ensure that costings of projects are accurately reflected, funding streams are updated, priorities and timings for delivery are accurate and to add or remove projects that arise through consultations and the planning process.

4. The Generic Infrastructure List

4.1 Where major (over 10 dwellings) unplanned sites are considered, the following generic infrastructure list is used as the basic approach to considering how required infrastructure should be funded. The list does not prevent s106 being used where there are very specific on or off-site infrastructure requirements or preclude East Suffolk from using CIL to enable delivery of infrastructure part funded through s106.

1.

2.

4.2 Table 1 is to be used as a guide to the approach to collecting contributions from unplanned sites.

Table 1

Infrastructure Required	S106/s278	CIL
Highway improvements including strategic cycling and pedestrian infrastructure	Х	
Strategic highway improvements including strategic cycling and pedestrian infrastructure		Х
Library Facilities		Х
Education – additional pre-school places at existing establishments		Х
Education – additional primary school places at existing establishments		Х
Education – additional secondary school and sixth form places at existing establishments		Х
Education – NEW Schools or early years settings	Х	
Off-site Health Infrastructure		Х
Off-site Police Infrastructure		Х
Off-site Leisure and Community Facilities		Х
Open Space	Х	
Maintenance of Open Space where transferred to East Suffolk	Х	
Strategic Green Infrastructure		Х
Strategic Flooding and coastal defence works		Х
Strategic Waste Infrastructure		Х
School Transport Contributions	Х	

5. The Infrastructure List 2020-21

- 5.1 The Infrastructure List is broken down into type, for example it starts with listing all highways projects and ends with Coastal Protection and Flooding, followed by the keys to colour coding within the Infrastructure List.
- 5.2 The infrastructure List is subject to annual review to ensure it accurately reflects delivery of the infrastructure projects. As Neighbourhood Plans are 'made' the infrastructure needs identified from this growth are added to this list.

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Trimley St Mary - pedestrian crossing	Desirable	Trimley St Mary Parish Council	£65,000	Trimley St Mary Parish Council	£20,000	£45,000	CIL	£O	None	Short term		DCIL funding 2018/19 - Completed Project
Rushmere St Andrew, Playford Road Traffic Calming	Desirable	Rushmere St Andrew Parish Council, Suffolk County Council	£61,050	Rushmere St Andrew Parish Council	£15,850	£45,200	CIL	£O	None	Short term		DCIL funding 2018/19 - Completed Project
Framlingham - Walkway Routes	Desirable	Framlingham Town Council	£107,000	Framlingham Town Council, S106	£52,000	£55,000	CIL	£O	None	Short term		DCIL funding 2018/19

Highways

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Halesworth - Footpath Hill Farm Road	Desirable	Suffolk County Council	£56,002.50	None	£O	£56,002.50	CIL	£O	None	Short term		DCIL Funding 2018/19
Normanston Park Pedestrian and Cycle Bridge, Lowestoft	Essential	East Suffolk Council	£1,200,000	None	£O	£1,200,000	CIL	£O	Suffolk County Council, East Suffolk Council, grant funding from organisati ons such as Sustrans (awarded quarterly)	Short term		At Feasibility Stage. £120,000 DCIL allocated 2017/18 and completed, £19,992 unspent returned to DCIL Fund.
Third Crossing over Lake Lothing, Lowestoft	Essential	Suffolk County Council, East Suffolk Council	£92,000,000	Central Government has confirmed funding for £73 million. Suffolk County Council is required to underwrite the remainder in advance of other local sources being identified.	£92,000,000	£O	None	£O	, New Anglia LEP, Highways England	Short term		Construction began April 2021. Opening anticipated for 2023.

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Brooke Peninsula Pedestrian and Cycle Bridge, Lowestoft (linked to Policy WLP2.4)	Essential	Suffolk County Council, East Suffolk Council	£4,810,382	Section 106 from permitted development on Kirkley Waterfront and Sustainable Urban Neighbourho od site	£2,912,950	£1,897,432	Section 106	£O	N/A	Short term		CIL used as 'top up' if needed
Extensions to footpaths along Parkhill, Oulton (Policy WLP2.14)	Essential	Suffolk County Council	£37,800	None	£O	£37,800	Section 278	£O	N/A	Short term		
Extensions to footpaths along Hall Lane and Union Lane, Oulton (Policy WLP2.15)	Essential	Suffolk County Council	£34,440	None	£O	£34,440	Section 278	£O	N/A	Short term		
Extensions to footpaths along Norwich Road, Halesworth (Policy WLP4.1)	Essential	Suffolk County Council	£37,100	None	£O	£37,100	Section 278	£O	N/A	Short term		
Extensions to footpaths along The Street, Barnby (Policy WLP7.2)	Essential	Suffolk County Council	£32,900	None	£O	£32,900	Section 278	£O	N/A	Short term		
Extensions to footpaths along The Street, Somerleyton (Policy WLP7.5)	Essential	Suffolk County Council	£43,120	None	£O	£43,120	Section 278	£O	N/A	Short term		

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Extensions to footpaths along Southwold Road, Brampton (Policy WLP7.9)	Essential	Suffolk County Council	£45,500	None	£O	£45,500	Section 278	£O	N/A	Short term		
Extensions to footpaths along Hogg Lane, Ilketshall St Lawrence (Policy WLP 7.11)	Essential	Suffolk County Council	£21,700	None	£O	£21,700	Section 278	£O	N/A	Short term		
Extensions to footpaths along School Road, Ringsfield (Policy WLP7.14)	Essential	Suffolk County Council	£18,900	None	£O	£18,900	Section 278	£O	N/A	Short term		
Extensions to footpaths along Sotterley Road, Willingham St Mary (Policy WLP7.16)	Essential	Suffolk County Council	£10,500	None	£O	£10,500	Section 278	£O	N/A	Short term		
Extension to cycle link along Loam Pit Lane, Halesworth (Policy WLP4.1)	Essential	Suffolk County Council	£62,700	None	£O	£62,700	Section 278, CIL	£O	N/A	Short term		Linked to Waveney Cycle Strategy projects H1, H6, H7, H9, H10, H15
Access Improvements and Servicing to Broadway Farm, Halesworth (Policy WLP4.6)	Critical	Developer, Suffolk County Council	£898,385.74 - £966,853.37	None	Unknown	£898,385.7 4 - £966,853.3 7	Section 278	£O	N/A	Short term		CIL used as 'top up' if needed
Improved Access to Leiston household	Desirable	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourho od CIL	Unknown	Unknown	Short term		Part of Leiston Neighbourhood Plan

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Waste Recycling Centre (Policy TM5)												
Extending Speed Limits in Leiston	Desirable	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourho od CIL, Section 106	Unknown	Unknown	Short term		Included in Leiston Neighbourhood Plan
Provision of cycling, walking and disability access routes (MAR13)	Desirable	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourho od CIL	Unknown	Unknown	Short term		Part of Martlesham Neighbourhood Plan
Dedicated access for cyclists and pedestrians at Woods Lane and Wilford Bridge Road, Melton (MEL2)	Essential	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourho od CIL	Unknown	Unknown	Short term		Part of Melton Neighbourhood Plan
Pedestrian crossings at Melton Road, Melton	Essential	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourho od CIL	Unknown	Unknown	Short term		Included in Melton Neighbourhood Plan
Improvements to Bus Shelters and information in Melton (Policy MEL4)	Desirable	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourho od CIL	Unknown	Unknown	Short term		Part of Melton Neighbourhood Plan
Bicyle racks at Melton Railway Station (MEL5)	Desirable	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourho od CIL	Unknown	Unknown	Short term		Part of Melton Neighbourhood Plan
Car Park and landscaping at Land Opposite McColls Convienience Store, The Street, Melton	Desirable	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourho od CIL	Unknown	Unknown	Short term		Part of Melton Neighbourhood Plan

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
(MEL7)												
Access from Boulge Road (BDP.9)	Essential	Developer, Suffolk County Council	Unknown	None	Unknown	Unknown	Section 106, Neighbourho od CIL	Unknown	Unknown	Short term		Part of Bredfield Neighbourhood Plan
Footpath link from site 534 to village centre (BDP.14)	Essential	Developer, Suffolk County Council	Unknown	None	Unknown	Unknown	Section 106, Neighbourho od CIL	Unknown	Unknown	Short term		Part of Bredfield Neighbourhood Plan
Provision of new or extended Public Rights of Way	Desirable	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourho od CIL	Unknown	Unknown	Short term		Included of Reydon Neighbourhood Plan
Provision of safe walking and cycling routes	Desirable	Parish Council, Suffolk County Council	Unknown	None	Unknown	Unknown	Neighbourho od CIL	Unknown	Unknown	Short term		Included of Reydon Neighbourhood Plan
Betts Avenue Public Right of Way improvements (SCLP12.19)	Essential	Suffolk County Council	£15,200	None	£O	£15,200	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Felixstowe Road public right of way improvements (SCLP12.19)	Essential	Suffolk County Council	£16,942	None	£O	£16,942	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Public Rights of Way stopping up contributions (SCLP12.19)	Essential	Suffolk County Council	£8,000	None	£O	£8,000	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Public Rights of Way Order Making (SCLP12.19)	Essential	Suffolk County Council	£19,500	None	£O	£19,500	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Brightwell Bridleway Scheme (SCLP12.19)	Essential	Suffolk County Council	£19,000	None	£O	£19,000	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Publlic Rights of Way Signage (SCLP12.19)	Essential	Suffolk County Council	£15,000	None	£O	£15,000	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Bridleway BR6 Improvement Scheme (Condition 69) (SCLP12.19)	Essential	Suffolk County Council	Unknown	None	£O	Unknown	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
General Public Rights of Way Improvements (Condition 10) (SCLP12.19)	Essential	Suffolk County Council	Unknown	None	£O	Unknown	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Anson Road Improvements (SCLP12.19)	Essential	Suffolk County Council	£60,000	None	£O	£60,000	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Arundel Road Improvements (SCLP12.19)	Essential	Suffolk County Council	£100,000	None	£O	£100,000	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Bell Lane Improvements (SCLP12.19)	Essential	Suffolk County Council	£100,000	None	£O	£100,000	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Dobbs Lane Improvements (SCLP12.19)	Essential	Suffolk County Council	£100,000	None	£O	£100,000	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Bus Infrastructure Improvements (SCLP12.19)	Essential	Suffolk County Council	£34,000	None	£O	£34,000	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Offsite Highways Mitigation Measures (SCLP12.19)	Essential	Suffolk County Council	£200,000	None	£O	£200,000	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes. Including £20,000 for survey work.
Speed Management Contributions (SCLP12.19)	Essential	Suffolk County Council	£200,247	None	£O	£200,247	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes. Including £32,040 for operating costs.
Highways Contributions (SCLP12.19)	Essential	Suffolk County Council	£399,998	None	£O	£399,998	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Speed Limit Signs (Condition 32) (SCLP12.19)	Essential	Suffolk County Council	Unknown	None	£O	Unknown	Section 106	£0	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Improvements to A14 Junction 58 (Condition 33) (SCLP12.19)	Essential	Suffolk County Council	Unknown	None	£O	Unknown	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Cycle and Footway Connection at Barrack Square (Condition 34) (SCLP12.19)	Essential	Suffolk County Council	Unknown	None	£O	Unknown	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Improvements to A12 Barrack Square/Eagle Way Junction and Barrack	Essential	Suffolk County Council	Unknown	None	£O	Unknown	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Square/Gloster Road Junction (Condition 37) (SCLP12.19)							J					
Improvements to Foxhall Road/Newborn Road Junction (Condition 38) (SCLP12.19)	Essential	Suffolk County Council	Unknown	None	£O	Unknown	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Improvements to Martlesham Roundabout (Condition 39) (SCLP12.19)	Essential	Suffolk County Council	Unknown	None	£O	Unknown	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Improvements to Goster Road/Felixstowe Road Junction (Condition 40) (SCLP12.19)	Essential	Suffolk County Council	Unknown	None	£O	Unknown	Section 106	£O	None	Short - medium term		As required by Section 106 Agreement for Brightwell Lakes
Access, cycle and footway improvements for North Felixstowe Garden Neighbourhood (Policy SCLP12.3)	Critical	Developer	Unknown	None	Unknown	Unknown	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Access and connectivity improvements at Land north of Conway Close and Swallow Close, Felixstowe	Essential/C ritical	Developer	£50,000 - £150,000	None	Unknown	£50,000 - £150,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
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(Policy SCLP12.4)		,	,									
Pedestrian and cycle enhancements at Land at Brackenbury Sports Centre, Felixstowe (Policy SCLP12.5)	Essential	Developer	£75,000	None	Unknown	£75,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Footway improvements at Land at Sea Road (Policy SCLP12.6)	Essential	Developer	£25,000	None	Unknown	£25,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Access improvements at Bridge Road, Felixstowe (Policy SCLP12.8)	Essential/C ritical	Developer	£50,000	None	Unknown	£50,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Junction Improvements at Land at Carr Road/Langer Road, Felixstowe (Policy SCLP12.9)	Essential/C ritical	Developer	£100,000 - £150,000	None	Unknown	£100,000 - £150,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Sustainable pedestrian and cycle connectivity at	Essential	Developer	£50,000	None	Unknown	£50,000	Section 278	£O	N/A	Short- medium term (with developme		

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Land at Haven Exchange (Policy SCLP12.10)										nt of site)		
Significant access improvements and improvements to the wider Land at Felixstowe Road (Policy SCLP12.20)	Critical	Developer	£350,000 - £500,000	Suffolk County Council, Highways England (e.g. Growth and Housing Fund if permitted before March 2021)	Unknown	£350,000 - £500,000	Section 278	£O	New Anglia LEP	Short- medium term (with developme nt of site)		
Footway improvements at Ransomes, Nacton Heath (Policy SCLP12.21)	Essential	Developer	£100,000	None	Unknown	£100,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Access improvements along with pedestrian and cycle connectivity at Land north east of Humber Doucy Lane (Policy SCLP12.24)	Critical	Developer	Unknown	None	Unknown	Unknown	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Access, junction, cycle and footway improvements at Suffolk Police HQ, Portal Avenue,	Essential/C ritical	Developer	£500,000	None	Unknown	£500,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Martlesham (Policy SCLP12.25)												
Access and junction improvements at Land rear of Rose Hill, Saxmundham Road, Aldeburgh (Policy SCLP12.27)	Essential/C ritical	Developer	£25,000 - £45,000 (footway works)	None	Unknown	£25,000 - £45,000 (footway works)	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Access, sustainable transport, cycle and footway improvements for South Saxmundham Garden Neighbourhood (Policy SCLP12.29)	Critical	Developer	Unknown	None	Unknown	Unknown	Section 106, Section 278, CIL	Unknown	N/A	Short- medium term (with developme nt of site)		
Access improvements along with maximisation of cycle and pedestrian connectivity at Land north-east of Street Farm, Saxmundham (Policy SCLP12.30)	Essential/C ritical	Developer	Unknown	None	Unknown	Unknown	Section 278	£O	N/A	Short- medium term (with developme nt of site)		

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Access and junction improvements at Land at Woodbridge Town Football Club (Policy SCLP12.33)	Essential/C ritical	Developer	£200,000	None	Unknown	£200,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Footway improvements at Land to the East of Aldeburgh Road, Aldringham (Policy SCLP12.42)	Essential	Developer	£10,000	None	Unknown	£10,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Cycle and footway improvements at Land south of Forge Close between Main Road and Ayden, Benhall (Policy SCLP12.43)	Essential	Developer	£50,000 - £70,000	None	Unknown	£50,000 - £70,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Footway improvements at Land to the Southeast of Levington Lane, Bucklesham (Policy SCLP12.44)	Essential	Developer	£40,000 - £100,000	None	Unknown	£40,000 - £100,000	Section 278	£O	N/A			
Cycle and footway improvements at Land to the	Essential	Developer	£125,000	None	Unknown	£125,000	Section 278	£O	N/A			

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
south of Darsham Station (Policy SCLP12.47)		,										
Footway improvements at Land off Laxfield Road, Dennington (Policy SCLP12.49)	Essential	Developer	£15,000 - £25,000	None	Unknown	£15,000 - £25,000	Section 278	£O	N/A			
Access and footway improvements at Land west of Chapel Road, Grundisburgh (Policy SCLP12.51)	Essential/C ritical	Developer	£150,000	None	Unknown	£150,000	Section 278	£O	N/A			
Access and pedestrian connectivity improvements at Land south of Ambleside, Main Road, Kelsale cum Carlton (Policy SCLP12.52)	Essential/C ritical	Developer	£15,000 (pedestrian connectivity)	None	Unknown	£15,000 (pedestrian connectivit γ)	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Junction and footway improvements at Land at School Road, Knodishall (Policy SCLP12.55)	Essential/C ritical	Developer	£30,000	None	Unknown	£30,000	Section 278	£0	N/A			

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Footway improvements at Land north of Mill Close, Orford (Policy SCLP12.57)	Essential	Developer	£5,000 - £10,000	None	Unknown	£5,000 - £10,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Rights of Way and access improvements at Land adjacent to Swiss Farm, Otley (Policy SCLP12.58)	Essential/C ritical	Developer	£30,000	None	Unknown	£30,000	Section 278	£O	N/A			
Footway improvements at Land adjacent to Farthings Sibton Road, Peasenhall (Policy SCLP12.59)	Essential	Developer	£30,000	None	Unknown	£30,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Footway improvements at Land between High Street and Chapel Lane, Pettistree (Policy SCLP12.60)	Essential	Developer	£95,000 - £115,000	None	Unknown	£95,000 - £115,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Pedestrian connectivity improvements at Land east of Redwald Road, Rendlesham (Policy SCLP12.62)	Essential	Developer	£100,000	None	Unknown	£100,000	Section 278	£O	N/A	Short – Medium term (with developme nt of site)		

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Access and pedestrian improvements at Land opposite The Sorrel Horse, The Street, Shottisham (Policy SCLP12.63)	Essential/C ritical	Developer	£50,000	None	Unknown	£50,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Access, footway and cycle connectivity improvements at Land off Howlett Way, Trimley St Martin (Policy SCLP12.64)	Essential/C ritical	Developer	£200,000 - £300,000	None	Unknown	£200,000 - £300,000	Section 278	£O	N/A	Short – Medium term (with developme nt of site)		
Access, footway and Public Rights of Way improvements at Land off Keightley Way, Tuddenham (Policy SCLP12.66)	Essential/C ritical	Developer	£100,000	None	Unknown	£100,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Footway improvements at Land south of Lower Road, Westerfield (Policy SCLP12.67)	Essential	Developer	£115,000	None	Unknown	£115,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Footway improvements at Land west of B1125, Westleton (Policy SCLP12.68)	Essential	Developer	£25,000 - £45,000	None	Unknown	£25,000 - £45,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Footway improvements at Land at Cherry Lee, Darsham Road, Westleton (Policy SCLP12.69)	Essential	Developer	£30,000	None	Unknown	£30,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Access and footway improvements at Land at Mow Hill, Witnesham (Policy SCLP12.70)	Essential/C ritical	Developer	£20,000 - £40,000	None	Unknown	£20,000 - £40,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Footway improvements at Land at Street Farm, Witnesham (Policy SCLP12.71)	Essential	Developer	£20,000	None	Unknown	£20,000	Section 278	£O	N/A	Short- medium term (with developme nt of site)		
Cycle link along Ellough Road, Beccles (linked to Policy WLP3.1)	Essential	Suffolk County Council	£112,100	None	£O	£112,100	Section 278, CIL	£O	N/A	Medium term		Linked to Waveney Cycle Strategy projects BE20 and BE21

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Cycle link between Lowestoft and Hopton (linked to Policy WLP2.13)	Essential	Suffolk County Council	£380,000	None	£O	£380,000	Section 278, CIL	£O	N/A	Medium term		CIL used as 'top up' if needed, Linked to Waveney Cycle Strategy projects R3, R4, R5 and R6.
Improvements to Bloodmoor Roundabout, Carlton Colville, Lowestoft (linked to Policy WLP2.16)	Essential	Suffolk County Council	£700,000 - £1,000,000	None	Unknown	£700,000 - £1,000,000	Section 106 – principally from WLP2.16 but also other sites in vicinity of Lowestoft	£O	N/A	Medium term		
Potential safety Improvements to A47 to accommodate the North Lowestoft Garden Village (Policy WLP2.12)	Potentially Critical	Highways England, Suffolk County Council	Unknown	Unknown	Unknown	Unknown	Section 278	Unknown	N/A	Long term		
Continuation of Shared Space Scheme at Felixstowe Town Centre	Desirable	Felixstowe Town Council, East Suffolk Council, Suffolk County Council	Unknown	Felixstowe Town Council, East Suffolk Council, Suffolk County Council	Unknown	Unknown	Section 106/Section 278	£O	N/A	Over entire plan period		CIL used as 'top up' if needed
Measures to improve capacity at Garrison Lane / High Road	Essential	Suffolk County Council	£250,000 - £300,000	None	Unknown	£250,000 - £300,000	Section 106/Section 278	£O	N/A	Over entire plan period		CIL used as 'top up' if needed

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
junction, Felixstowe												
Measures to improve capacity at Garrison Lane / Mill Lane junction, Felixstowe	Essential	Suffolk County Council	£250,000 - £300,000	None	Unknown	£250,000 - £300,000	Section 106/Section 278	£O	N/A	Over entire plan period		CIL used as 'top up' if needed
Improvements to A14, junction 55 (Copdock Interchange, Ipswich)	Essential	Suffolk County Council, Highways England	£65,000,000 - £100,000,000	Highways England, Central Government	£9,750,000 - £15,000,000	Unknown	CIL	Unknown	Highways England, Central Governm ent, other ISPA authoritie s	Over entire plan period. Local (Suffolk Coastal)		Contribution derived from traffic modelling of proportion of trips derived from Suffolk Coastal Local Plan growth.
Improvements to A14, junction 56 (Wherstead)	Essential	Suffolk County Council, Highways England	TBC	Highways England, Central Government	Unknown	Contributio n unknown – potential contributio n from developme nt proposal in Babergh District to be funded via s278	Section 278/CIL	Unknown	Develope r contributi ons from ISPA authoritie s, Highways England (Road Investme nt Strategy or Minor Works Fund),	Over entire plan period		

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap Central Governm ent	Timescale / Progress	Status	Comments
Improvements to A14, junction 57 (Nacton)	Essential	Suffolk County Council, Highways England	£5,000,000 - £10,000,000	Highways England, Central Government, DfT Minor Works Fund	£1,075,000 - £2,150,000	Unknown	CIL	Unknown	Highways England, Central Governm ent	Over entire plan period. Local (Suffolk Coastal)		Contribution derived from traffic modelling of proportion of trips derived from Suffolk Coastal Local Plan growth.
Improvements to A14, junction 58 (Seven Hills)	Essential	Suffolk County Council, Highways England	£5,000,000	Highways England, Central Government	Unknown (if under s278)	£5,000,000	Section 106,/Section 278/CIL	Unknown	Highways England, Central Governm ent, other ISPA authoritie S	Over entire plan period		Contributions expected from sites SCLP12.19 and SCLP12.20.
Sustainable transport measures in lpswich, including Smarter Choices, Quality Bus Partnership and other measures	Essential	Suffolk County Council	£7,300,000 - £8,400,000	Suffolk County Council, Developers, ISPA Authorities	Unknown	£2,100,000 - £2,400,000	S106/CIL	£5,200,000- £6,000,000	Develope r contributi ons from ISPA authoritie s	Over entire plan period (figures to 2026)		
Infrastructure improvements to support sustainable transport measures and junction	Essential	Suffolk County Council	£16,000,000 - £20,000,000 (up to 2026)	Developers, Suffolk County Council, ISPA authorities	Unknown	£4,500,000 - £5,600,000	S106/CIL	£11,500,00 0- £14,400,00 0	Develope r contributi ons from ISPA authoritie s	Over entire plan period (figures to 2026)		

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
improvements												
Measures to increase capacity on Foxhall Road (from A12 to Heath Road)	Essential	Suffolk County Council	£200,000 - £250,000	None	£O	£200,000 - £250,000	Section 106	Unknown	Unknown	Over entire plan period.		There is a requirement for permitted site SCLP12.19 to deliver these improvements.
Measures to increase capacity on A1214	Essential	Suffolk County Council	£4,000,000	None	Unknown. Proportion from East Suffolk TBC	Unknown	Section 106/ Section 278	Unknown	Develope r contributi ons from ISPA Authoriti es	Over entire plan period		
Measures to improve capacity at Melton crossroads	Essential	Suffolk County Council	£250,000 - £300,000	None	Unknown	£250,000 - £300,000	Section 106/S278	£O	N/A	Over entire plan period		
Measures to improve capacity at A12/B1079 junction	Essential	Suffolk County Council	£300,000 - £350,000	None	Unknown	£300,000 - £350,000	Section 106/ Section 278	£O	Central Governm ent Funding, NSIPs	Over entire plan period		

Project	Priority	Lead Provider	Estimated Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Potential Developer Contributi on	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Measures to improve capacity at B1121/Chantry Road junction, Saxmundham	Essential	Developer	Unknown	None	Unknown	Unknown	Section 106/ Section 278	£O	N/A	Over entire plan period		
Dedicated footpaths and cyclepaths between Fromer Ashley Nurseries Site and Land at Laurel Farm East, West and South (SA1, SA2 and SA3)	Essential	Developer	Unknown	Unknown	Unknown	Unknown	Section 106, Neighbourho od CIL	Unknown	Unknown	Over entire plan period		Part of Kessingland Neighbourhood Plan
Provision of dedicated cyclepaths and footpaths (TM1)	Essential	Parish Council, Developer	Unknown	Unknown	Unknown	Unknown	Neighbourho od CIL	Unknown	Unknown	Over entire plan period		Part of Leiston Neighbourhood Plan

Totals	Approximate Cost	Potential Non- Developer Funding Amount	Required Developer Contributio n	Potential Remainin g Funding Gap	
Total	£ 100,501,530.2 0 - 100,891,997.8 0	£94,912,950	£ 5,588,580.2 4 - 5,957,048.8 7	£0	
Total	£107,840,937 - 153,775,937	£10,912,850 - 17,237,850	Unknown	Unknown	
Total	Unknown	Unknown	Unknown	Unknown	

Overall Totals	£208,342,467. 20 - 254,667,934.8	£105,825,80 Unknown 0 - 112,150,800	Unknown	
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Early Years Education

Project	Priority	Lead Provide r	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timesca le/ Progres s	Status	Comments
Additional 30 pre-school places at Holton St Peter Primary School	Essential	Suffolk County Council	£615,240	None	£O	£615,240	CIL	£O	None	Short term		To be delivered in addition to the new setting at Dairy Farm, Halesworth (WLP4.5)
Provision of a pre-school Centre on land at Playing Fields off Francis Road, Kessingland (CI3)	Essential	Develope r, Suffolk County Council	Unknown	None	Unknown	Unknown	S106, Neighbourho od CIL	Unknown	Unknown	Short term		Part of Kessingland Neighbourhood Plan
Pre-school provision at Brightwell Lakes (SCLP12.19)	Essential	Suffolk County Council	£935,601	None	£O	£935,601	Section 106	£O	None	Short - medium term		Including built provision (344m2 indoor space, 285m2 outdoor space). A contribution of £18,000,000 will be required for education provision at Brightwell Lakes. This will cover pre- school, primary, secondary, and further education, which will be mostly provided by a single all- through school. Final contributions will be determined once the mix of housing on the site has been fully established.
1 new pre- school setting at new primary school on North Lowestoft Garden Village (Policy WLP2.13)	Essential	Suffolk County Council	£1,230,480	None	£O	£1,230,480	Section 106	£O	None	Short- medium term		60 place pre-school setting to be delivered alongside the new primary school on North of Lowestoft Garden Village. Delivery dependent on housing growth build out. Land secured for £1. Fully serviced - minimum 2.2ha 420 place primary and for 60 FTE place setting. Location to be determined in consultation with SCC at Master planning stage and Reserved Matters stage.

Project	Priority	Lead Provide r	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timesca le/ Progres s	Status	Comments
1 new pre- school setting in Gunton and Corton area (North Lowestoft Garden Village) (Policy WLP2.13)	Essential	Suffolk County Council	£1,230,480	None	£O	£1,230,480	Section 106	£O	None	Short- medium term		60 place pre-school part of a local shopping centre on North of Lowestoft Garden Village. Delivery dependent on housing growth build out. Setting would not be needed until after setting at new primary school is delivered. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Master planning stage and Reserved Matters stage.
1 new pre- school setting at new primary school in Kirkley Waterfront and Sustainable Urban Neighbourho od (WLP2.4)	Essential	Suffolk County Council	£1,230,480	None	£O	£1,230,480	CIL	£O	None	Short- medium term		Kirkley Waterfront and Sustainable Urban Neighbourhood partially secured extant permission should this permission lapse the need is for a 60- place pre-school setting to delivered alongside the new primary school and another 60-place pre- school setting as part of the Local Centre. Land secured for £1. Fully serviced - minimum 2.2ha 420 place primary and for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage.
1 new pre- school setting in Kirkley and Whitton Area. Linked with Policies WLP2.4 and WLP2.6	Essential	Suffolk County Council	£1,230,480	None	£0	£1,230,480	CIL	£O	None	Short- medium term		Kirkley Waterfront and Sustainable Urban Neighbourhood partially secured extant permission should this permission lapse the need is for a 60- place pre-school setting to delivered alongside the new primary school and another 60-place pre- school setting as part of the Local Centre. Land secured for £1. Fully serviced - minimum 2.2ha 420 place primary and for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage.

Project	Priority	Lead Provide r	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timesca le/ Progres s	Status	Comments
1 new pre- school at new primary school on Beccles and Worlingham Garden Neighbourho od (Policy WLP3.1)	Essential	Suffolk County Council	£1,230,480	None	£O	£1,230,480	Section 106	£O	None	Short- medium term		Pre-school setting to delivered alongside the new primary school. Land setting secured for £1. Fully serviced - minimum 2.2ha 420 place primary and for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage.
1 new pre- school setting at Community Hub in Beccles and Worlingham Garden Neighbourho od (Policy WLP3.1)	Essential	Suffolk County Council	£1,230,480	None	£0	£1,230,480	Section 106	£O	None	Short- medium term		Stand-alone Pre-school setting. Setting at primary school as part of WLP3.1 to be delivered first. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage.
1 new pre- school setting in Beccles and Worlingham area to serve development on Land West of London Road, Beccles (Policy WLP3.2)	Essential	Suffolk County Council	£1,230,480	None	£0	£1,230,480	Section 106	£O	None	Short- medium term		Standalone Pre-school setting. Setting at primary school as part of WLP3.1 to be delivered first. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage.

Project	Priority	Lead Provide r	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timesca le/ Progres s	Status	Comments
1 new pre- school setting at Dairy Farm, Halesworth (Policy WLP4.5). Linked with other sites in Halesworth (WLP4.1 - 4.4)	Essential	Suffolk County Council	£1,230,480	None	£O	£1,230,480	CIL	£O	None	Short- medium term		Expected to be needed in 2023. Standalone 60 place setting. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Master planning stage and Reserved Matters stage.
1 new pre- school setting at Land West of St Johns Road, Bungay (Policy WLP5.2)	Essential	Suffolk County Council	£1,230,480	None	£O	£1,230,480	Section 106	£O	None	Short- medium term		0.09 hectares of land on the site should be made available for a new pre-school setting. Site needed by 300th dwelling occupation. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Master planning stage and Reserved Matters stage.
1 new pre- school setting in Oulton (Policies WLP2.14 and WLP2.15)	Essential	Suffolk County Council	£1,230,480	None	£O	£1,230,480	CIL	£O	None	Short- medium term		0.09 hectares of land on the site should be made available for a new pre-school setting. Site needed by 300th dwelling occupation. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage.
1 new pre- school setting at new primary school on Land South of The Street (Policy WLP2.16)	Essential	Suffolk County Council	£1,230,480	None	£O	£1,230,480	Section 106	£O	None	Short- medium term		Pre-school setting to delivered alongside the new primary school. Site needed by 300th dwelling occupation. Land secured for £1. Fully serviced - minimum 2.2ha 420 place primary and for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage.

Project	Priority	Lead Provide r	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timesca le/ Progres s	Status	Comments
Pre-school setting/s at South Saxmundham Garden Neighbourho od (Policies SCLP12.29, SCLP12.30, SCLP12.43, SCLP12.52, SCLP12.59 & SCLP12.1)	Essential	Suffolk County Council	£1,845,720	Unknown	£O	£1,784,196	Section 106	£61,524	Unknown	Short - Medium term		One form of entry primary school on a 2.2ha site to enable further expansion and pre-school provision. Second setting on 0.13ha of land reserved for a further new pre-school setting if suitable and accessible alternative provision is not available elsewhere in the town. Pre-school setting with primary school delivered first - Land setting secured for £1. Fully serviced - minimum 2.2ha 420 place primary and for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage.
Pre-school settings at North Felixstowe Garden Neighbourho od (Policies SCLP12.3, SCLP12.4)	Essential	Suffolk County Council	£4,306,680	Unknown	£O	£2,932,644	Section 106	£1,374,036	Extant Section 106/CIL	Short - medium term		Provision of 630 primary school spaces and 90 place pre-school provision; Should be a further two 60 place settings elsewhere within the garden neighbourhood. Land secured for £1. Fully serviced - minimum 3ha 630 place primary and for 90 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage. Two additional 60 place settings. Land secured for £1. Fully serviced - minimum 915.2sqm 60 FTE place settings. Location to be determined in consultation with SCC at Reserved Matters stage.
Pre-school settings in Felixstowe – including at Walton High Street North, existing school sites and/or at Land at Brackenbury Sports Centre (Policy SCLP12.5) or Land at Sea	Essential	Suffolk County Council	£1,845,720	Unknown	£O	£244,045	Section 106	£1,601,675	Extant Section 106/CIL	Short - medium term		30 places at Caustone or Colneis primary or 12.5 reserve site at Brakenbury (0.1 ha if needed pre- school). 60 place Walton Green North.

Project	Priority	Lead Provide r	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timesca le/ Progres s	Status	Comments
Road (Policy SCLP12.6)												
Pre-school setting with new primary school at Land Adjacent to Reeve Lodge (Policy SCLP12.65) and pre- school setting at Land off Howlett Way (Policy SCLP12.64)	Essential	Suffolk County Council	£1,230,480	Unknown	£O	£943,368	Section 106	£287,112	Extant Section 106/CIL	Short - medium term		SCLP12.65 Provision of 2.2ha of land for a primary school including and 0.1ha of land for pre-school. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Master planning stage and Reserved Matters stage. provision; Reservation of a site on SCLP12.64 for a new pre-school setting on 0.1ha of land; Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Master planning stage and Reserved Matters stage.
Pre-school setting/expan sion of existing settings in Leiston and Aldeburgh (Policy SCLP12.1, SCLP12.27, SCLP12.42, SCLP12.55)	Essential	Suffolk County Council	£1,230,480	Unknown	£O	£184,572	Section 106	£1,045,908	Unknown	Short- medium term		Needs from existing permissions - new development will only cover part of the cost. Expansion of existing setting. Mid local plan period.

Project	Priority	Lead Provide r	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timesca le/ Progres s	Status	Comments
Additional Early Education Capacity in Rendlesham Ward (Policies SCLP12.62 & SCLP12.61)	Essential	Suffolk County Council	£155,412	Unknown	£O	£155,412	CIL	£O	CIL	Short – medium term		No capacity to expand. May need to find places in adjacent wards if places are not available.
Additional Early Education Capacity in Woodbridge Ward (Policies SCLP12.32 and SCLP12.33)	Essential	Suffolk County Council	£345,360	Unknown	£O	£345,360	CIL	£O	None	Short - medium term		Some expansion possible. Projects being investigated.
Additional Early Education Capacity in Fynn Valley Ward (Policies SCLP12.66, SCLP12.67, SCLP12.70, SCLP12.71)	Essential	Suffolk County Council	£155,412	Unknown	£O	£155,412	CIL	£O	None	Medium term		Improvements to be investigated.
Additional Early Education Capacity in Kirton Ward (Policies SCLP12.44, SCLP12.54, SCLP12.56)	Essential	Suffolk County Council	£103,608	Unknown	£O	£103,608	CIL	£O	None	Medium term		Improvements to be investigated.

Project	Priority	Lead Provide r	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timesca le/ Progres s	Status	Comments
Additional Early Education Capacity in Wenhaston and Westleton Ward (Policies SCLP12.1, SCLP12.47, SCLP12.48, SCLP12.69, SCLP12.68)	Essential	Suffolk County Council	£310,824	Unknown	£O	£310,824	CIL	£O	None	Medium term		No capacity to expand. May need to find places in adjacent wards if places are not available.
Pre-school setting in Wickham Market Ward (Policies SCLP12.1, SCLP12.46, SCLP12.51, SCLP12.60)	Essential	Suffolk County Council	£615,240	Unknown	£O	£451,176	Section 106	£164,064	Unknown	Medium term		SCLP12.60 Provision of 0.1ha of land for a new pre- school setting if needed. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Master planning stage and Reserved Matters stage.
Pre-school setting at Land at Humber Doucy Lane, Rushmere St Andrew (Policy SCLP12.24)	Essential	Suffolk County Council	£1,230,480	Unknown	£O	£287,112	Section 106	£943,368	Section 106 from other development	Long term		Cross border needs - Section 106 from other developments may need to fill gap. Provision of 0.1ha of land for a pre-school setting if needed within East Suffolk. Expected delivery after settings at Ipswich Garden Suburb are delivered. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Master planning stage and Reserved Matters stage.

Project	Priority	Lead Provide r	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timesca le/ Progres s	Status	Comments
Additional Early Education Capacity in Framlingham Ward (Policies SCLP12.1, SCLP12.49, SCLP12.53)	Essential	Suffolk County Council	£393,192	Unknown	£O	£393,192	CIL	£O	None	Unknown		SCLP12.49 If required, 0.1ha of land on the site should be reserved for a new pre-school setting or a contribution made towards a new pre-school setting off-site. Need towards end of development. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Master planning stage and Reserved Matters stage.
Additional Early Education Capacity in Kesgrave Ward (Policy SCLP12.1)	Essential	Suffolk County Council	£31,082	Unknown	£O	£31,082	CIL	£O	None	Unknown		Some expansion possible. Projects being investigated.
Additional Early Education Capacity in Orford and Eyke Ward (Policies SCLP12.57, SCLP12.45, SCLP12.50)	Essential	Suffolk County Council	£135,208	Unknown	£O	£135,208	CIL	£O	None	Unknown		SCLP12.50 - Eyke - site includes provision of land to accommodate expansion of primary school and pre -school setting if needed. Land for new setting secured for £1. Fully serviced - minimum 915.2sqm for 60 FTE place setting. Location to be determined in consultation with SCC at Reserved Matters stage.

Totals	Approximat e Cost	Potential Non- Developer Funding Amount	Required Developer Contributio n	Potential Remaining Funding Gap
Total	£14,150,520	£0	£14,150,520	£0
Total	£14,870,500	£0	£9,392,813	£5,477,687
Total	Unknown	Unknown	Unknown	Unknown

Overall Totals		£2	9,021,020	£0		£23,543,333		£5,477,687				
Primary Edu	cation	1		l.		,	,					
Project	Priority	Lead Provider	Approximate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
Provision for 106 additional pupils for schools in Halesworth and Holton (Policies WLP4.1, WLP4.2, WLP4.3, WLP4.4, WLP4.5. WLP7.15)	Essential	Suffolk County Council	£1,830,408	None	£O	£1,830,408	CIL	£O	None	Short term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via expansion of Edgar Sewter CP School by 105 places from 315 to 420 places
New primary school at Trimley St Martin (Policies SCLP12.54, SCLP12.64, SCLP12.65)	Essential	Suffolk County Council	£8,613,360	Unknown	£O	£2,676,294	Section 106	£5,937,066	Suffolk County Council (via prudential borrowing)	Short term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via the relocation and expansion of Trimley St Martin Primary School to a 2.2ha site within Land adjacent to Reeve Lodge, High Road, Trimley St Martin (SCLP12.65).
All through school provision at Brightwell Lakes (SCLP12.19)	Essential	Suffolk County Council	£18,000,000	None	£O	£18,000,000	Section 106	£O	Suffolk County Council (via prudential borrowing)	Short - medium term		A contribution of approx. £18,000,000 will be required for education provision at Brightwell Lakes. This will cover pre-school, primary, secondary, and further education, which will be mostly provided by a single all-through school. Final contributions will be determined once the mix of housing on the site has been fully established.
Provision for additional 85 pupils at The Limes Primary School on Woods Meadow (Policies WLP2.14 and WLP2.15)	Essential	Suffolk County Council	£1,467,780	None	£O	£1,467,780	CIL	£O	None	Short – medium term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via The Limes Primary Academy which has been designed to accommodate additional pupils.

Project	Priority	Lead Provider	Approximate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
Provision for 23 additional pupils at Blundeston CofE Primary School/ The Limes Primary School (Policies WLP7.3, WLP7.4 and WLP7.12)	Essential	Suffolk County Council	£397,164	None	£O	£397,164	CIL	£O	None	Short- medium term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity, The proposed strategy for mitigating this growth is via the Limes Primary Academy which has been designed to accommodate additional pupils.
Provision for 34 additional pupils in the vicinity of Southwold and Reydon (Policy WLP6.1)	Essential	Suffolk County Council	£587,112	None	£O	£587,112	CIL	£O	None	Short- medium term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via expansion of the school by 105 places from 210 to 315 places which can only be achieved if adjacent land were secured. The County Council is investigating the acquisition of land to enable the expansion of Reydon Primary School. However, if it cannot be secured, the result would be that pupils are displaced into neighbouring catchments - Brampton, Wenhaston and Bramfield. This would represent a less sustainable pattern of development.
Provision for 8 additional pupils at Ringsfield Primary School (Policy WLP7.14)	Essential	Suffolk County Council	£138,144	None	£O	£138,144	CIL	£O	None	Short- medium term		Growth may necessitate the expansion of the catchment school using developer contributions.
New primary school at Felixstowe (Policies SCLP12.3, SCLP12.5, SCLP12.6, SCLP12.4)	Essential	Suffolk County Council	£10,254,000	Unknown	£O	£8,864,583	Section 106	£1,389,417	Suffolk County Council (via prudential borrowing)	Short - medium term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via the provision of a new primary school located on a 3ha site within the North Felixstowe Garden Neighbourhood (SCLP12.3).

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Provision for additional places at Sir Robert Hitcham Primary School (Policy SCLP12.1)	Essential	Suffolk County Council	£431,700	Unknown	£O	£431,700	CIL	£O	Suffolk County Council (via prudential borrowing)	Short- medium term		Growth may necessitate the expansion of the catchment school using developer contributions.
New Primary School (including pre-school) on Kirkley Waterfront and Sustainable Urban Neighbourhood Site (Policy WLP2.4)	Essential	Suffolk County Council	£8,613,360	Section 106 already signed for Brooke Peninsula which will provide approximat ely £4,730,434 depending on the exact mix of properties.	£4,730,434	£2,949,566	Section 106	£933,360	None	Medium term		Accommodate new students from WLP2.6. The proposed strategy for mitigating this growth is via the provision of a new primary school located on a 2.2ha site within the Kirkley Waterfront and Sustainable Urban Neighbourhood (WLP2.4).
New Primary School (including pre-school) on Land South of The Street, Carlton Colville (Policy WLP2.16)	Essential	Suffolk County Council	£8,613,360	None	£O	£4,614,300	Section 106	£3,999,060	Suffolk County Council, CIL from future developme nt	Medium term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via the provision of a new primary school located on a 2.2ha site within Land South of The Street, Carlton Colville/ Gisleham (WLP2.16).
New Primary School (including pre-school) on Beccles and Worlingham Garden Neighbourhood (Policy WLP3.1)	Essential	Suffolk County Council	£8,613,360	None	£O	£6,408,750	Section 106	£2,204,610	Suffolk County Council, CIL from future developme nt	Medium term		Will accommodate students from WLP3.2 and WLP7.13. The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is by the provision of a new primary school. A 2.2ha site should be reserved within WLP3.1 to allow for a primary school and early years setting to be provided on the site.

Project	Priority	Lead Provider	Approximate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
New primary school at Saxmundham (Policies SCLP12.29, SCLP12.30)	Essential	Suffolk County Council	£8,613,360	Unknown	£O	£4,434,855	Section 106	£4,178,505	Section 106 from other relevant developme nt, Suffolk County Council (via prudential borrowing)	Medium term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is by the provision of a new primary school. A 2.2ha site should be reserved within the Saxmundham Garden Village to allow for a primary school and early years setting to be provided on the site.
Provision for additional pupils at Bucklesham Primary School/Brightwell Lakes School (Policy SCLP12.44)	Essential	Suffolk County Council	£138,144	Unknown	£O	£138,144	CIL	£O	Suffolk County Council (via prudential borrowing)	Medium term		Revised Strategy - pupils would need places as Brightwell Lakes New Primary School.
Provision for additional pupils at Woodbridge Primary School, (or St Mary's Primary) (Policies SCLP12.32, SCLP12.33, SCLP12.1)	Essential	Suffolk County Council	£1,277,832	Unknown	£O	£1,277,832	CIL	£O	Suffolk County Council (via prudential borrowing)	Medium term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via utilising available places at alternative schools in Woodbridge. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school, in the longer term.

Project	Priority	Lead Provider	Approximate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
Provision for additional places at Martlesham Primary School (Policies SCLP12.25, SCLP12.1)	Essential	Suffolk County Council	£1,381,440	Unknown	£O	£1,381,440	CIL	£O	Suffolk County Council (via prudential borrowing)	Medium term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via expansion of the school.
New Primary School (including pre-school) on North Lowestoft Garden Village (Policy WLP2.13)	Essential	Suffolk County Council	£8,613,360	None	£O	£6,665,100	Section 106	£1,948,260	Suffolk County Council, CIL from future developme nt	Medium – long term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitgating this growth is via the provision of a new primary school located on a 2.2ha site within the Lowestoft Garden Village (WLP2.13).
Provision for additional pupils at new Ipswich Garden Suburb Primary (Policies SCLP12.66, SCLP12.67, SCLP12.24)	Essential	Suffolk County Council	£1,036,080	Unknown	£O	£1,036,080	Section 106	£O	Section 106 from other relevant developme nt, Suffolk County Council (via prudential borrowing)	Medium – long term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is by the provision of a new primary school within the lpswich Garden Suburb (Red House) development.

Project	Priority	Lead Provider	Approximate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
Provision for additional places at primary schools in Kesgrave (Policy SCLP12.1)	Essential	Suffolk County Council	£86,340	Unknown	£O	£86,340	CIL	£O	Suffolk County (via prudential borrowing)	Unknown		Revision of strategy - The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via utilising available places at alternative schools in Woodbridge. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school, in the longer term.
Provision for additional pupils at Hollesley Primary School (Policy SCLP12.63)	Essential	Suffolk County Council	£51,804	Unknown	£O	£51,804	CIL	£O	Suffolk County Council (via prudential borrowing)	Medium - long term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. However, the quantum of growth proposed for the catchment area does not automatically warrant permanent expansion of the catchment school. It is expected that the additional pupils emanating from this development would take priority over some of the children coming from out of the catchment area (as at January 2020 c.33% of the school roll) over time through the admissions process. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school, in the longer term.

Project	Priority	Lead Provider	Approximate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
Provision for additional pupils at Rendlesham Primary School (Policies SCLP12.61, SCLP12.62)	Essential	Suffolk County Council	£448,968	Unknown	£O	£448,968	CIL	£0	Suffolk County Council (via prudential borrowing)	Medium - long term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. However, the quantum of growth proposed for the catchment area does not automatically warrant permanent expansion of the catchment school. It is expected that the additional pupils emanating from this development would take priority over some of the children coming from out of the catchment area (as at January 2020 c.10% of the school roll) over time through the admissions process. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school, in the longer term.
Provision for additional pupils at Easton Primary School (Policies SCLP12.53, SCLP12.1)	Essential	Suffolk County Council	£120,876	Unknown	£O	£120,876	CIL	£0	Suffolk County Council (via prudential borrowing)	Medium - long term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. However, the quantum of growth proposed for the catchment area does not automatically warrant permanent expansion of the catchment school. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school, in the longer term. It is expected that the additional pupils emanating from this development would take priority over some of the children coming from out of the catchment area (as at January 2020 c.76% of the school roll) over time through the admissions process. Should demand for places change, this may necessitate the expansion of the catchment school using developer

Project	Priority	Lead Provider	Approximate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
												contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school, in the longer term.
Provision for additional pupils at Eyke Church of England Primary School (Policies SCLP12.45 & SCLP12.50)	Essential	Suffolk County Council	£345,360	Unknown	£O	£345,360	CIL	£O	Suffolk County Council (via prudential borrowing)	Medium - long term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. However, the quantum of growth proposed for the catchment area does not automatically warrant permanent expansion of the catchment school. It is expected that the additional pupils emanating from this development would take priority over some of the children coming from out of the catchment area (as at January 2020 c.59% of the school roll) over time through the admissions process. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school, in the longer term To preserve the ability of the school to expand should this be required in the future 0.4ha of land

Project	Priority	Lead Provider	Approximate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
												from SCLP12.50 will be reserved.
Provision for additional pupils at St Marys CEVCP School, Benhall (Policy SCLP12.43)	Essential	Suffolk County Council	£224,484 - 276,288	Unknown	£O	£224,484 - 276,288	Section 106/CIL	£0	Suffolk County Council (via prudential borrowing)	Medium- long term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. However, the quantum of growth proposed for the catchment area does not automatically warrant permanent expansion of the catchment school. It is expected that the additional pupils emanating from this development would take priority over some of the children coming from out of the catchment area (as at January 2020 c.70% of the school roll) over time through the admissions process. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school, in the longer term.

Project	Priority	Lead Provider	Approximate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
Provision for additional places at Wenhaston Primary School (Policy SCLP12.1)	Essential	Suffolk County Council	£103,608	Unknown	£O	£103,608	CIL	£O	Suffolk County (via prudential borrowing)	Medium - long term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. However, the quantum of growth proposed for the catchment area does not automatically warrant permanent expansion of the catchment school. It is expected that the additional pupils emanating from this development would take priority over some of the children coming from out of the catchment area (as at January 2020 c.49% of the school roll) over time through the admissions process. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school, in the longer term.
Provision for additional pupils at Leiston Primary School (Policies SCLP12.27, SCLP12.42, SCLP12.55, SCLP12.1)	Essential	Suffolk County Council	£690,720	Unknown	£O	£690,720	CIL	£O	Suffolk County Council (via prudential borrowing)	Medium - long term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the existing school is currently forecast to exceed 95% capacity. However, the quantum of growth proposed for the catchment area does not automatically warrant permanent expansion of the catchment school. It is expected that the additional pupils emanating from this development would take priority over some of the children coming from out of the catchment area (as at January 2020 c.66% of the school roll) over time through the admissions process. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school, in the longer term.

Project	Priority	Lead Provider	Approximate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
Provision for additional pupils at Kelsale Primary School (Policies SCLP12.52, SCLP12.1)	Essential	Suffolk County Council	£224,484 - 276,288	Unknown	£O	£224,484 - 276,288	Section 106/CIL	£O	Suffolk County Council (via prudential borrowing)	Long term		Based on current forecasts the school has sufficient surplus capacity to accommodate the additional pupils arising from the development. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school.
Provision for 15 additional pupils at Barnby North Cove Primary School (Policy WLP7.2)	Essential	Suffolk County Council	£259,020	None	£O	£259,020	CIL	£O	None	Long term		Based on current forecasts the school has sufficient surplus capacity to accommodate the additional pupils arising from this development. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school.
Provision for 12 additional pupils at Brampton Community Primary School (Policies WLP7.9, WLP7.10 and WLP7.16)	Essential	Suffolk County Council	£207,216	None	£O	£207,216	CIL	£O	None	Long term		Based on current forecasts the school has sufficient surplus capacity to accommodate the additional pupils arising from this development. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school.
Provision for 11 additional pupils at Ilketshall St Lawrence School (Policies WLP7.11, WLP7.17)	Essential	Suffolk County Council	£189,948	None	£O	£189,948	CIL	£O	None	Long term		Based on current forecasts the school has sufficient surplus capacity to accommodate the additional pupils arising from this development. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school.

Project	Priority	Lead Provider	Approximate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
Potential relocation of Bungay Primary School (Policies WLP5.1 and WLP5.2)	Essential	Suffolk County Council	Unknown	None	£O	Unknown	CIL	Unknown	None	Long term		Based on current forecasts the school has sufficient surplus capacity to accommodate the additional pupils arising from this development. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school.
Provision for additional pupils at Dennington CEVCP School (Policy SCLP12.49)	Essential	Suffolk County Council	£172,680	Unknown	£O	£172,680	CIL	£O	Suffolk County Council (via prudential borrowing)	Long term		Based on current forecasts the school has sufficient surplus capacity to accommodate the additional pupils arising from this development. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school.
Provision for additional pupils at Witnesham Primary School (Policies SCLP12.58, SCLP12.70, SCLP12.71)	Essential	Suffolk County Council	£483,504	Unknown	£O	£483,504	CIL	£O	Suffolk County Council (via prudential borrowing)	Long term		Based on current forecasts the school has sufficient surplus capacity to accommodate the additional pupils arising from this development. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school.

Totals	Approximate Cost	Potential Non- Developer Funding Amount	Required Developer Contributio n	Potential Remaining Funding Gap	
Total	£39,530,232	£4,730,434	£25,714,508	£9,085,290	
Total	£52,698,744 - £52,802,352	£0	£41,193,756 -	£11,504,988	
			£41,297,364		
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Total	None	None	None	None	
Overall Totals	£91,295,616 - 91,399,224	£4,730,434	£66,908,264 - 67,011,872	£20,590,278	

Secondary Education

Project	Priority	Lead Provider	Approximate Cost	Non- Develope r Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
Expansion of Bungay High School	Essential	Suffolk County Council	£3,566,250	Unknown	£O	£142,650	CIL	£3,423,600	Suffolk County Council (via prudential borrowing)	Short term		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via expansion of the 11-16 provision at the school by 150 places from 900 to 1050 places with a further possible expansion to 1200 to be required in the future. To future proof the school site 0.75ha has been reserved within policy WLP5.2 for the school site extension.
All through school provision at Brightwell Lakes (SCLP12.19)	Essential	Suffolk County Council	£18,000,000	None	£O	£18,000,000	Section 106	£O	Suffolk County Council (via prudential borrowing)	Short - medium term		A contribution of approximately £18,000,000 will be required for education provision at Brightwell Lakes. This will cover pre-school, primary, secondary and further education, which will be mostly provided by a single all-through school. Final contributions will be determined once the mix of housing on the site has been fully established.
Expansion of Thomas Mills High School, Framlingham	Essential	Suffolk County Council	£2,211,075	Unknown	£O	£2,211,075	CIL	£O	Suffolk County Council (via prudential borrowing)	Over entire plan period		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via expansion of the school.

Project	Priority	Lead Provider	Approximate Cost	Non- Develope r Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
Expansion of Felixstowe Academy	Essential	Suffolk County Council	£1,283,850	Unknown	£O	£1,283,850	CIL	£O	Suffolk County Council (via prudential borrowing)	Over entire plan period		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via expansion of Felixstowe Academy.
Provision for additional pupils at Brightwell Lakes Secondary School	Essential	Suffolk County Council	£16,106,350	Unknown	£O	£16,106,350	CIL	£O	Suffolk County Council (via prudential borrowing)	Over entire plan period		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via the new Brightwell Lakes Secondary School.
Provision for additional pupils at Ipswich Garden Suburb Secondary School	Essential	Suffolk County Council	£1,022,325	Unknown	£O	£1,022,325	CIL	£O	Suffolk County Council (via prudential borrowing)	Over entire plan period		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is by the provision of a new secondary school within the Ipswich Garden Suburb development.
Provision for additional pupils at Claydon High School	Essential	Suffolk County Council	£261,525	Unknown	£O	£261,525	CIL	£O	Suffolk County Council (via prudential borrowing)	Over entire plan period		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. Contributions are expected to be sought to enable expansion. The maximum level of expansion achievable on the existing site is a small increase 82 places. However, it is expected that demand from development and background population will mean that this expansion is not sufficient to mitigate this growth. The remainder of the additional demand will be met through out-of-catchment pupils from Ipswich being diverted back to Ipswich secondary schools in the longer term. Significant available capacity exists at Westbourne High School and the new Ipswich Garden Suburb secondary is planned to provide for

Project	Priority	Lead Provider	Approximate Cost	Non- Develope r Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
												the north and west of Ipswich. If needed, temporary places could be provided at schools in Ipswich, to manage short-term excess demand.

Totals	Approximate Cost	Potential Required Non- Developer Developer Contributio Funding n Amount	Potential Remaining Funding Gap
Total	£0	£0 £0	£0
Total	£42,451,375	£0 £39,027,775	£3,423,600
Total	None	None None	None
Overall Totals	£42,451,375	£0 £39,027,775	£3,423,600

<u>Health</u>

Project	Priority	Lead Provider	Approximate Cost	Non-Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Additional floorspace and enhancements at Framlingham Surgery	Essential	lpswich and East Suffolk CCG	£300,000	Unknown	£177,600	£122,400	CIL	£O	NHS England	Short term		2017/18 DCIL £122,400. £122,400 from Framlingham GP Practice and £55,200 from Estates Technology and Transformation Funding (ETTF) scheme. Project completed
Enhancements at Little St John Street Surgery, Woodbridge	Essential	lpswich and East Suffolk CCG	£60,000	NHS England	£30,000	£30,000	CIL	Unknown	None	Short term		2017/18 DCIL £30,000 allocated to Little St John Street Surgery. Project completed; however possible extension still needed in the area to deal with extra population proposed in the Local Plan.

Project	Priority	Lead Provider	Approximate Cost	Non-Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Additional floorspace and enhancements at Wickham Market Practice and it's branch Rendlesham Surgery	Essential	lpswich and East Suffolk CCG	£194,000	Unknown	£194,000	None	None	Unknown	NHS England	During plan period		Work has been completed to increase capacity at Rendlesham branch Surgery. No developer contribution was requested. Project completed.
Additional floorspace needed at Saxmundham Health Centre	Essential	Ipswich and East Suffolk CCG	Unknown	Unknown	Unknown	£460,800	Section 106	Unknown	NHS England/an other	Short term		The CCG is working with the practice on options for creating the needed capacity and this could involve reconfiguration, extension or a new build in Saxmundham.
Additional floorspace at Leiston Surgery and it's branch Yoxford Surgery	Essential	Ipswich and East Suffolk CCG	£90,000	Unknown	Unknown	£90,000	CIL	None	NHS England/an other	Short term		Project to look at increasing the current capacity at Leiston Surgery is at business case level and CIL Bid to be submitted as soon as possible to fund the majority of the scheme. Reconfiguration of current site is proposed that will create enough capacity at Leiston Surgery for the duration of the plan period.

Project	Priority	Lead Provider	Approximate Cost	Non-Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Martlesham/Birch es increase in floorspace	Essential	Developer, Ipswich and East Suffolk CCG	£2,000,000	3PD	Unknown	£320,000	CIL	£1,680,000	NHS England/ another	Short term		The CCG are working with both Martlesham Heath Surgery and the Birches Medical Centre at increasing floorspace in the locality and options are currently being assessed.
Additional enhancements at Little St John Street Surgery and/or Framfield House Surgery, Woodbridge	Essential	lpswich and East Suffolk CCG	Unknown	Unknown	Unknown	£50,500	CIL	Unknown	NHS England	Medium term		Total required developer contribution reflects allocations in the Local Plan.
Additional primary care floorspace in the Felixstowe, Kirton and Trimleys Areas	Essential	Ipswich and East Suffolk CCG	Unknown	Unknown	Unknown	£782,000	Section 106/CIL	Unknown	NHS England/an other	Medium term		Work is being done with the local Primary Care Network to assess the impact of proposed developments in the area and how best to mitigate the impact on health services. Required developer contribution reflects allocations in the Local Plan.
New health facility/health contribution relating to Brightwell Lakes development (SCLP12.19)	Essential	Developer, Ipswich and East Suffolk CCG	Unknown	3PD	Unknown	£750,000	Section 106	Unknown	NHS England/an other	Long term		Possible longer term plan to mitigate the increase capacity associated with the Brightwell Lakes development

Project	Priority	Lead Provider	Approximate Cost	Non-Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
843 square metres of clinical floorspace in the Lowestoft Area	Essential	Norfolk and Waveney CCG	£3,286,014.00	Unknown	£O	£3,286,014.0 0	CIL	£O	NHS England	During plan period		Bridge Road Surgery project: S106 land available on Woods Meadow development Current registration constraint c.4000 Lowestoft PCN have highest space utilisation in the STP Potential new registrations for Lowestoft area from housing: 12,298 843m ² required to address demand from new housing
16 square metres of clinical floorspace in Kessingland	Essential	Norfolk and Waveney CCG	£35,366.24	Unknown	£O	£35,366.24	CIL	£O	NHS England	During plan period		Longshore Surgeries, Kessingland - potential project to be confirmed
243 square metres of clinical floorspace in Beccles	Essential	Norfolk and Waveney CCG	£947,214.00	Unknown	£O	£947,214.00	CIL	£O	NHS England	During plan period		Beccles Medical Centre - extension to existing premises completing May 2021. Current registration constraint c. 8000 Potential new registrations for Beccles area from housing: 3,557 243m ² required to address demand from new housing
52 square metres of clinical floorspace in Bungay	Essential	Norfolk and Waveney CCG	£202,696.00	Unknown	£O	£202,696.00	CIL	£O	NHS England	During plan period		Bungay Medical Centre - potential project to be confirmed
109 square metres of clinical floorspace in Halesworth	Essential	Norfolk and Waveney CCG	£424,882.00	Unknown	£O	£424,882.00	CIL	£O	NHS England	During plan period		Cutlers Hill Surgery project: extension Current registration constraint c.3000 Potential new registrations for Halesworth area from housing: 1592 109m ² required to address demand from new housing

Project	Priority	Lead Provider	Approximate Cost	Non-Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
54 square metres of clinical floorspace in Southwold	Essential	Norfolk and Waveney CCG	£210,492.00	Unknown	£O	£210,492.00	CIL	fO	NHS England	During plan period		Sole Bay Health Centre Current registration constraint c. 386 Potential new registrations for Southwold area from housing: 796 54m ² required to address demand from new housing
Additional enhancements at Grundisburgh Surgery and Otley Surgery (both are branches of the Debenham Practice)	Essential	lpswich and East Suffolk CCG	Unknown	Unknown	Unknown	£57,500	CIL	Unknown	NHS England/an other	During plan period		Currently options are being looked at in this area but PCN capacity will determine the strategy going forward. Required developer contribution reflects allocations in the Local Plan.
Additional enhancements at The Peninsula Practice and its branches Chapman House and Church Farm Surgery.	Essential	lpswich and East Suffolk CCG	Unknown	Unknown	Unknown	£18,900	CIL	Unknown	NHS England/ another	During plan period		Aldeburgh Church Farm is now a branch of The Peninsula Practice. Currently options are being looked at in this area but PCN capacity will determine the strategy going forward. Required developer contribution reflects allocations in the Local Plan.

Totals	Approximate Cost	Potential Non- Developer Funding Amount	Required Developer Contributio n	Potential Remainin g Funding Gap
Total	£5,106,664.24	£0	£5,106,664. 24	£0
Total	£2,644,000	Unknown	£2,682,100	Unknown

Total	None	None None	None
Overall Totals	£7,750,664.24	Unknown £7,788,764. 24	£0

Utilities

Project	Priorit y	Lead Provider	Approximat e Cost	Non- Developer Funding Sources	Potential Non -Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Potential upgrades to electricity network in Beccles	Critical	UK Power Networks.	Unknown	None	Unknown	Unknown	Section 106	Unknown	UK Power Networks, New Anglia, Enterprise Zone Pot B	Medium- long term		
Potential improvements to the 11kv network between Saxmundham and Benhall primary substation	Critical	UK Power Networks	Unknown	Unknown	Unknown	Unknown	Section 106	Unknown	Unknown	During plan period		
Potential improvements to Peasenhall primary substation	Critical	UK Power Networks	Unknown	Unknown	Unknown	Unknown	Section 106	Unknown	Unknown	During plan period		
Potential need for new primary substation at Sevenhills Roundabout	Critical	UK Power Networks	Unknown	Unknown	Unknown	Unknown	Section 106	Unknown	OFGEM	During plan period		

Totals	Approximat e Cost	Potential Non -Developer Funding Amount	Required Developer Contributio n	Potential Remainin g Funding Gap	
Total	Unknown	Unknown	Unknown	Unknown	
Total	Unknown	Unknown	Unknown	Unknown	
Total	None	None	None	None	
Overall Totals	Unknown	Unknown	Unknown	Unknown	
		· · · · · · · · · · · · · · · · · · ·			

<u>Waste</u>

Project	Priority	Lead Provid er	Approxim ate Cost	Non- Develope r Funding Sources	Potential Non- Develope r Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
Expansion of Foxhall household waste recycling centre	Essential	Suffolk County Council	£6,000,000	Suffolk County Council	£5,000,000	£1,000,000	CIL	Unknown	Unknown	Short term		Current project has reached final design stage and planning application submission stage. This design will almost double the size of the current site by expanding into adjacent land and will address highway access and queuing issues and provide a split level infrastructure to avoid the public having to use steps to access containers. The new site should future proof the service in this area for approximately 25 years. The catchment of Foxhall extends to authorities beyond East Suffolk, so there may be scope for the developer contributions to be partly met form outside of East Suffolk.
Remodelling of Lowestoft household waste recycling centre	Essential	Suffolk County Council	£1,500,000	Suffolk County Council	Unknown	Unknown	CIL	Unknown	None	Medium- Iong term		This project has been under review sometime in order to address capacity and queuing issues. Some improvements have already been carried out but it is likely that further solutions will be required.
Improvements to Leiston household waste recycling centre	Essential	Suffolk County Council	£500,000	Unknown	Unknown	£500,000	CIL	Unknown	Unknown	Over entire plan period		The current priority at Leiston recycling centre is to improve highway access issues.
Improvements to Felixstowe household waste recycling centre	Essential	Suffolk County Council	£1,500,000	Unknown	Unknown	£1,500,000	CIL	Unknown	Unknown	Over entire plan period		This project is kept under review as developments in the immediate Felixstowe vicinity are increasing the demand at this recycling centre.

Project	Priority	Lead Provid er	Approxim ate Cost	Non- Develope r Funding Sources	Potential Non- Develope r Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
Relocation of Stowmarket waste recycling centre	Essential	Suffolk County Council	£4,000,000	Unknown	Unknown	£6,780	CIL	Unknown	Unknown	Over entire plan period		This site is too small for the catchment area it serves, particularly taking into account the amount of past and future planned developments in this area. There are also highway access issues. This recycling centre replacement has been identified as a high priority and a project has commenced to identify an alternative site. £1m has been earmarked for locating to a new site only. Total cost of constructing a new site is approximately £4m. Related to development at SCLP12.58.

Totals	Approxim ate Cost	Potential Non- Develope r Funding Amount	Required Developer Contributio n	Potential Remainin g Funding Gap	
Total	£1,500,000	Unknown	Unknown	Unknown	
Total	£12,000,00 0	Unknown	£3,006,780	Unknown	
Total	None	None	None	None	
Overall Totals	£13,500,00 0	Unknown	Unknown	Unknown	

Police

Project	Priority	Lead Provider	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Contribution to police provision, including recruitment and equipment of Community Support Officer, at Brightwell Lakes (SCLP12.19)	Essential	Suffolk Constabulary	£156,898	Unknown	£O	£156,898	Section 106	£O	Suffolk Constabulary	Short- medium term		
Potential new police facility / extensions to existing estate	Essential	Suffolk Constabulary	£8,000,000	Unknown	£O	£337,500	CIL	£7,662,500	Suffolk Constabulary	Over entire plan period		Developer contribution responds to growth in the Local Plan. Additional funding will be needed if a new facility is required.
Increase in police staffing levels across the District	Essential	Suffolk Constabulary	£145,012	Unknown	£O	£145,012	CIL	£O	Suffolk Constabulary	Over entire plan period		
6 new police vehicles	Essential	Suffolk Constabulary	£124,500	Unknown	£O	£124,500	CIL	£O	Suffolk Constabulary	Over entire plan period		
135 square metres of new office floorspace	Essential	Suffolk Constabulary	£337,500	Unknown	£O	£337,500	CIL	£O	Suffolk Constabulary	Over entire plan period		Not needed if new facility is delivered
4 new Automatic Number Plate Recognition points	Essential	Suffolk Constabulary	£240,292	Unknown	£O	£240,292	CIL	£O	Suffolk Constabulary	Over entire plan period		

Project	Priority	Lead Provider	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
South Saxmundham Garden Neighbourhood (Policy SCLP 12.29): 35m ² of additional police floorspace, recruitment/trai ning/equipping police officers/police community support officers/back- office staff, 2 x police vehicles, automatic number plate recognition technology.	Essential	Suffolk Constabulary	£633,753	Unknown	£O	£633,753	Section 106	£O	Suffolk Constabulary	During plan period		
North Felixstowe Garden Neighbourhood (Policy SCLP 12.3): 95m ² of additional police floorspace, recruitment/trai ning/equipping police officers/police community support officers/back office staff, 3 x	Essential	Suffolk Constabulary	£1,081,357	Unknown	£O	£1,081,357	Section 106	£O	Suffolk Constabulary	During plan period		

Project	Priority	Lead Provider	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Remainin	Potential Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
police vehicles, automatic number plate recognition technology.												

Totals	Approximat e Cost	Potential Non- Developer Funding Amount	Required Developer Contributio n	Potential Remainin g Funding Gap	
Total	£8,847,304	£0	£1,184,804	£7,662,50 0	
Total	£1,872,008	£0	£1,872,008	£0	
Total	None	None	None	None	
Overal Totals	£10,719,312	£0	£3,056,812	£7,662,50 0	

Libraries

Project	Priority	Lead Provide r	Approxim ate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributi on	Type of Developer Contributi on	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
Improvements to capacity of Lowestoft / Oulton Broad Library (Policies WLP2.1 - 2.20)	Desirable	Suffolk County Council	£882,792	None	£O	£882,792	CIL	£O	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide.
Improvements to capacity of Beccles Library (Policies WLP3.1, WLP3.2, WLP7.2, WLP7.13, WLP7.14, WLP7.16)	Desirable	Suffolk County Council	£351,216	None	£O	£351,216	CIL	£O	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide.
Improvements to capacity of Bungay Library (Policies WLP5.1 and WLP5.2)	Desirable	Suffolk County Council	£104,760	None	£O	£104,760	CIL	£O	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide.
Improvements to capacity of Halesworth Library (Policies WLP4.1 - 4.5, WLP7.9, WLP7.10, WLP7.11, WLP7.15, WLP7.17)	Desirable	Suffolk County Council	£127,656	None	£O	£127,656	CIL	£O	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide.
Improvements to capacity of Kessingland Library (Policy WLP7.8)	Desirable	Suffolk County Council	£12,960	None	£O	£12,960	CIL	£O	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide.
Improvements to capacity of Southwold Library (Policies WLP6.1 and WLP7.7)	Desirable	Suffolk County Council	£50,976	None	£O	£50,976	CIL	£O	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide.

Project	Priority	Lead Provide r	Approxim ate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributi on	Type of Developer Contributi on	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
Library contribution relating to Brightwell Lakes development (SCLP12.19)	Desirable	Suffolk County Council	£27,000	None	£O	£27,000	Section 106	£O	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide.
Enhanced library provision for Felixstowe and the Trimleys (Policies SCLP12.3 - 12.6, SCLP12.54, SCLP12.64, SCLP12.65)	Desirable	Suffolk County Council	£486,216	None	£O	£486,216	CIL	£O	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide.
lmprovements at Wickham Market library	Desirable	Suffolk County Council	£47,520	None	£O	£47,520	CIL	£O	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide.
Improvements at Aldeburgh library (Policies SCLP12.27 and SCLP12.42)	Desirable	Suffolk County Council	£10,800	None	£O	£10,800	CIL	£O	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide.
Improvements at Framlingham library (Policies SCLP12.46, SCLP12.49, SCLP12.53)	Desirable	Suffolk County Council	£57,888	None	£O	£57,888	CIL	£O	Suffolk County Council	Over plan period		Linked with Neighbourhood Plan requirements (SCLP12.1). Approximate costs may change during review of Developers Contributions Guide.
Improvements at Halesworth library (Policy SCLP12.59)	Desirable	Suffolk County Council	£3,024	None	£O	£3,024	CIL	£O	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide.

Project	Priority	Lead Provide r	Approxim ate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributi on	Type of Developer Contributi on	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
Enhanced library provision for areas surrounding lpswich (Policies SCLP12.19, SCLP12.44, SCLP12.56, SCLP12.66, SCLP12.70)	Desirable	Suffolk County Council	£31,320	None	£O	£31,320	CIL	£O	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide.
Enhanced library provision at Kesgrave (Policy SCLP12.24)	Desirable	Suffolk County Council	£36,720	None	£O	£36,720	CIL	£O	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide.
Enhanced library provision at Leiston (Policy SCLP12.55)	Desirable	Suffolk County Council	£25,056	None	£O	£25,056	CIL	£O	Suffolk County Council	Over plan period		Linked with Neighbourhood Plan requirements (SCLP12.1). Approximate costs may change during review of Developers Contributions Guide.
Improvements at Saxmundham library (Policies SCLP12.29, SCLP12.30, SCLP12.48, SCLP12.52, SCLP12.68, SCLP12.69)	Desirable	Suffolk County Council	£247,320	None	£O	£247,320	CIL	£O	Suffolk County Council	Over plan period		Approximate costs may change during review of Developers Contributions Guide.
Enhanced library provision at Southwold	Desirable	Suffolk County Council	£5,400	None	£O	£5,400	CIL	£O	Suffolk County Council	Over plan period		Linked with Neighbourhood Plan requirements (SCLP12.1). Approximate costs may change during review of Developers Contributions Guide.
Improvements at Woodbridge library (Policies SCLP12.32, SCLP12.33, SCLP12.45, SCLP12.50, SCLP12.51, SCLP12.25, SCLP12.57, SCLP12.58, SCLP12.60,	Desirable	Suffolk County Council	£176,472	None	£O	£176,472	CIL	£O	Suffolk County Council	Over plan period		Linked with Neighbourhood Plan requirements (SCLP12.1). Approximate costs may change during review of Developers Contributions Guide.

Project	Priority	Lead Provide r	Approxim ate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributi on	Type of Developer Contributi on	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescal e/ Progress	Status	Comments
SCLP12.61, SCLP12.62, SCLP12.63)												

Totals	Approxim ate Cost	Potential No -Developer Funding Amount	n Required Developer Contributi on	Potential Remaining Funding Gap	
Total	£1,530,360	£0	£1,530,360	£0	
Total	£1,154,736	£0	£1,154,736	£0	
Total	None	None	None	None	
Overall Totals	£2,685,096	£0	£2,685,096	£0	

Community Centres

Project	Priority	Lead Provider	Approxim ate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contribution	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
New community centre in Bungay	Essential	Bungay Honeypot Trust	£746,460	Sale of existing community centre for housing.	£380,000	£366,460	CIL	£O	None	Short term		£366,460 DCIL Allocated 2018/19 - £350,000 from sale of the land £30,000 from Bungay Honeypot Trust. Project completed.
Easton & Letheringham Village Hall Refurbishment	Desirable	Easton and Letheringham Village Hall Committee	£48,000	Easton and Letheringham Village Hall Committee	£10,000	£38,000	CIL	£O	None	Short term		DCIL Funding 2018/19. £10,915.44 underspent. Project completed.
Woodbridge - Jetty Lane Community Centre Feasibility Study	Desirable	Jetty Lane Community Interest Company (CIC)	£3,140,000	Fundraising	£2,951,200	£188,800	CIL	£O	None	Short term		DCIL Funding 2018/19
Framlingham - St Michael's Rooms Community Centre	Desirable	Parochial Church Council, Framlingham Town Council	£840,000	Framlingham Town Council and donations	£140,000	£700,000	CIL	£O	None	Short term		DCIL Funding 2018/19
Worlingham Community Centre	Essential	Worlingham Parish Council	£1,219,478	Parish Council	£1,000,000	£219,478	CIL	£O	None	Short term		£219,478 DCIL allocated, £70,000 for feasability (2018/19, £4,824.30 underspent) and £149,478 for captial costs (2019/20)
New community centre in Halesworth on Dairy Farm site (Policy WLP4.5)	Essential	East Suffolk Council, Developers	£715,540	Sale of existing community facilities.	Unknown	Unknown	CIL	Unknown	None	Short term		Update once funds from sale of existing facilities has been confirmed. Approximate cost based on BCIS data.

Project	Priority	Lead Provider	Approxim ate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contribution	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Improvements to Community Facilities at Recreation Ground, Victory Road, Leiston.	Desirable	Parish Council	Unknown	Heritage Lottery Fund	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Short term		Inlcuded in Leiston Neighbourhood Plan
Provision of community facilities at Playing Fields, Melton Road (MEL9)	Desirable	Parish Council	Unknown	Heritage Lottery Fund	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Short term		Inlcuded in Melton Neighbourhood Plan
New community facility totalling 450-500sqm internal area including changing facilities and separate office for police at Brightwell Lakes (SCLP 12.19)	Essential	Developer	Unknown	None	£O	Unknown	Section 106	Unknown	None	Short - medium term		
New community centre at North Felixstowe Garden Neighbourhood (Policy SCLP12.3)	Essential	Developer	Unknown	Unknown	Unknown	Unknown	CIL	Unknown	Unknown	Short term		
New community centre in Somerleyton	Essential	East Suffolk Council, Developers	£301,280	None	£O	£301,280	CIL	£O	None	Short- medium term		A contribution from the local community/neighbourhood CIL will be required. Approximate cost based on BCIS data.

Project	Priority	Lead Provider	Approxim ate Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contribution	Potential Remainin g Funding Gap	Potential Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
New community centre in Brampton (Policy WLP7.9)	Essential	East Suffolk Council, Developers	£301,280	None	£O	£301,280	Section 106/CIL	£O	None	Short- medium term		Unknown if this can be delivered with site. Approximate cost based on BCIS data.
Refurbishment of community centre in Ringsfield	Essential	East Suffolk Council, Developers	Unknown	None	£0	Unknown	CIL	Unknown	None	Short- medium term		A contribution from the local community/neighbourhood CIL will be required.
New community centre in Carlton Colville	Essential	East Suffolk Council, Developers	£715,540	None	£214,000	£501,540.00	CIL	£O	None	Medium term		A contribution from the local community/neighbourhood CIL will be required. Approximate cost based on BCIS data.
New community centre in Beccles	Essential	East Suffolk Council, Developers	£715,540	None	£O	£715,540	Section 106	£O	None	Medium term		Approximate cost based on BCIS data.
New community centre on North of Lowestoft Garden Village (Policy WLP2.13)	Essential	East Suffolk Council, Developers	£715,540	None	£O	£715,540	Section 106	£O	None	Long term		Delivered with site. Approximate cost based on BCIS data.
New community centre in Framlingham (FRAM22)	Desirable	Parish Council, Developer	Unknown	Unknown	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Over plan period		Part of the Framlingham Neighbourhood Plan
Provision of a new community centre and facilities at Waterloo Avenue (IN2)	Desirable	Parish Council, Developer	Unknown	Unknown	Unknown	Unknown	Neighbourhood CIL	Unknown	Unknown	Over plan period		Part of Leiston Neighbourhood Plan

Totals	Approxim ate Cost	Non- D	Required Developer Contributio	Potential Remainin g Funding Gap
Total	£6,270,658	£1,734,000 £3	3,821,118	Unknown
Total	£3,188,000	£2,961,200 £2	226,800	Unknown
Total	Unknown	Unknown U	Inknown	Unknown
Overall Totals	£9,458,658	£4,695,200 £4	4,047,918	Unknown

Green Infrastructure

Project	Priority	Lead Provider	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
East of England Park (Policy WLP2.5)	Essential	East Suffolk Council	£1,086,078	Coastal Communiti es Fund	£997,901	£88,000	CIL	£O	None	Short term		DCIL funding 2018/19 - £88,000. Project completed
Beccles Quay	Desirable	East Suffolk Council, Beccles Town Council and Broads Authority	£90,339	Beccles Fenland Trust	£6,339	£84,000	CIL	£O	None	Short term		£90,339 quay improvement project - funded by DCIL (2018/19) £84,000 and £6,339 Beccles Fenland Charity Trust. Project completed.
Allotments and community orchard at Brightwell Lakes (SCLP12.19)	Desirable	Developer	Unknown	Unknown	Unknown	Unknown	Section 106	Unknown	Unknown	Short- medium term		
Country park on Land South of The Street, Carlton Colville (WLP2.16)	Desirable	East Suffolk Council	£120,000	Unknown	Unknown	£120,000	Section 106	£O	None	Short- medium term		Delivered with site
County park on Beccles and Worlingham Garden Neighbourhood (WLP3.1)	Desirable	East Suffolk Council	£152,000	Unknown	Unknown	£152,000	Section 106	£O	None	Short- medium term		Delivered with site
Open space provision at North Felixstowe Garden Neighbourhood (Policy SCLP12.3)	Essential	Developer	Unknown	Unknown	Unknown	Unknown	Section 106	Unknown	Unknown	Short- medium term		Delivered with site

Open space provision at South Saxmundham Garden Neighbourhood (Policy SCLP12.29)	Essential	Developer	Unknown	Unknown	Unknown	Unknown	Section 106	Unknown	Unknown	Short- medium term	Delivered with site
Additional burial space at Framlingham Cemetery (FRAM24)	Desirable	Developer	Unknown	Unknown	Unknown	Unknown	Neighbourho od CIL	Unknown	Unknown	Over plan period	Part of the Framlingham Neighbourhood Plan
Cemetery expansion with public toilets and parking (SA1)	Desirable	Developer	Unknown	Unknown	Unknown	Unknown	Section 106, Neighbourho od CIL	Unknown	Unknown	Over plan period	Part of Leiston Neighbourhood Plan
Porivsion of allotments/com munity garden (SA3)	Desirable	Developer	Unknown	Unknown	Unknown	Unknown	Section 106, Neighbourho od CIL	Unknown	Unknown	Over plan period	Part of Leiston Neighbourhood Plan
Provision of allotments, community orchard and community farm/education facility (MEL10 and MEL20)	Desirable	Developer	Unknown	Unknown	Unknown	Unknown	Neighbourho od CIL	Unknown	Unknown	Over plan period	Part of Leiston Neighbourhood Plan

Totals	Approximat e Cost	Potential Non- Developer Funding Amount	Required Developer Contributio n	Potential Remaining Funding Gap	
Total	£1,448,417	£1,004,240	£444,000	£0	
Total	Unknown	Unknown	Unknown	Unknown	
Total	Unknown	Unknown	Unknown	Unknown	
Overall Totals	£1,448,417	£1,004,240	£444,000	Unknown	

Sports and Leisure

Project	Priority	Lead Provider	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Provision of full- sized sand filled football/hockey pitch in Beccles	Desirable	East Suffolk Council	£770,154	Football Foundation	£695,654	£74,500	CIL	Unknown	None	Short term		3G Football Pitch at Beccles TFC in 18/19 - DCIL funded Project Completed
Beccles Lido Improvements	Desirable	East Suffolk Council	£517,828.00	Various	£442,828.00	£75,000.00	CIL	£0.00	None	Short term		DCIL funding 2019/20 Project Completed
Ufford Recreation Ground Car Park Resurface	Desirable	Ufford Parish Council	£28,000.00	Ufford Parish Council	£25,000.00	£3,000.00	CIL	£0.00	None	Short term		DCIL Funding 2018/19 Project Completed
Lowestoft - Royal Green - play equipment and footpath improvements	Desirable	East Suffolk Council in partnership with Sentinel Leisure Trust and Waveney Norse	£125,000.00	S106 from planning permissions DC/12/1014/F UL, DC/13/0131/F UL, DC/0457/COU.	£1,500.00	£123,500.00	CIL	£0.00	None	Short term		DCIL Funding 2018/19 Project Competed
Halesworth Campus Phase 1	Essential	East Suffolk Council, Suffolk County Council	£3,800,000	Sale of land	£2,300,000	£1,500,000	CIL	£0.00	Sport England, Football Associati on, National Lottery and other sports associatio ns	Short term		
Relocation, Improvements and an extra pitch at Gunton Park Rugby Club	Desirable	East Suffolk Council	Unknown	Sale of land	Unknown	Sale of land is expected to cover entire cost	None	Unknown	None	Short term		

167

Project	Priority	Lead Provider	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Provision of small 3G pitch at Bungay and District Sports Association	Desirable	East Suffolk Council	Unknown	None	£O	Unknown	CIL	£O	None	Short term		
Expand cricket pitches on Southwold Common by 2 wickets	Desirable	East Suffolk Council	Unknown	None	£O	Unknown	CIL	Unknown	None	Short term		
Improved tennis courts in Lowestoft, Beccles, Ringsfield, Blundeston and Wrentham	Desirable	East Suffolk Council	Unknown	None	£O	Unknown	CIL	Unknown	None	Short term		
Improved playing pitches in Halesworth, Reydon, Shadingfield, Ringsfield, Blundeston and Wrentham	Desirable	East Suffolk Council	Unknown	None	£O	Unknown	CIL	Unknown	None	Short term		
Playing pitch on Kirkley Waterfront Sustainable Urban Neighbourhood (Policy WLP2.4)	Desirable	East Suffolk Council	£250,000	Unknown	£250,000	£O	None	£O	None	Short term		
Playing pitches on Land South of Southwold Road, Brampton (Policy WLP7.9)	Desirable	East Suffolk Council	£28,750	Unknown	£O	£28,750	Section 106	£O	None	Short term		

Project	Priority	Lead Provider	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
New Sports provision and associated open space, (totaling 7.9 ha), including changing facilities and toilets, at Brightwell Lakes (SCLP12.19)	Desirable	Developer	Unknown	Unknown	Unknown	Unknown	Section 106	Unknown	None	Short term		
Provision of a childrens play area (SA1)	Desirable	Developer	Unknown	None	Unknown	Unknown	S106, Neighbourho od CIL	Unknown	Unknown	Short term		Part of Kessingland Neighbourhood Plan
Extended Play Field Space at Laurel Farm (Policy SA2)	Desirable	Developer	Unknown	None	Unknown	Unknown	S106	Unknown	Unknown	Short term		Part of Kessingland Neighbourhood Plan
Provision of Neighbourhood Equipped Area for Play (SA3)	Desirable	Developer	Unknown	None	Unknown	Unknown	S106, Neighbourho od CIL	Unknown	Unknown	Short term		Part of Kessingland Neighbourhood Plan
Brightwell Lakes Public Art Scheme (SCLP12.19)	Desirable	Developer	£100,000	Unknown	Unknown	£100,000	Section 106	£O	None	Short - medium term		
Halesworth Campus Phase 2	Desirable	East Suffolk Council, Suffolk County Council	£1,750,000 - 2,250,000	None	£O	£1,750,000 - 2,250,000	CIL	£O	Sport England, Football Associati on, National Lottery and other sports associatio ns	Short – medium term		

Project	Priority	Lead Provider	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
Playing pitches on Beccles and Worlingham Garden Neighbourhood (Policy WLP3.1)	Desirable	East Suffolk Council	£460,000	Unknown	£O	£460,000	Section 106	£O	None	Short - medium term		
New leisure centre development at North Felixstowe Garden Neighbourhood (Policy SCLP12.3)	Essential	East Suffolk Council, Developer	Unknown	East Suffolk Council	Unknown	Unknown	Section 106/CIL	Unknown	Sport England, Football Associati on, National Lottery and other sports associatio ns	Short- medium term		
Enhancement of sports and community facilities at Suffolk Police HQ, Martlesham (Policy SCLP12.25)	Essential	Developer	Unknown	Unknown	Unknown	Unknown	Section 106/CIL	Unknown	Sport England, Football Associati on, National Lottery and other sports associatio ns	Short- medium term		
Playing pitches on North of Lowestoft Garden Neighbourhood (Policy WLP2.13)	Desirable	East Suffolk Council	Unknown	Unknown	Unknown	Unknown	Section 106	Unknown	None	Medium- long term		
Oakes Farm Development (Policy WLP2.19)	Essential	East Suffolk Council	£6,273,178	Unknown	Unknown	£250,000	Section 106	£6,023,178	CIL	Unknown		

Project	Priority	Lead Provider	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remainin g Funding Gap	Potentia I Funding Sources to Fill Gap	Timescale / Progress	Status	Comments
New changing rooms and improved tennis courts at Normanston park	Desirable	East Suffolk Council	£200,000	Football Foundation	£50,000	£150,000	CIL	£O	None	Unknown		
Provision of 2 Neighbourhood Equipped Areas for Play in Framlingham (FRAM9 and FRAM25)	Desirable	Developer	Unknown	Unknown	Unknown	Unknown	S106, Neighbourho od CIL	Unknown	Unknown	Over entire plan period		Part of the Framlingham Neighbourhood Plan

Totals	Approxima te Cost	Potential Required Non- Developer Developer Contributio Funding n Amount	Potential Remainin g Funding Gap
Total	£14,174,91 0- 14,674,910	£3,739,982 £4,411,750- 4,911,750	£6,023,17 8
Total	£128,000	Unknown Unknown	Unknown
Total	Unknown	Unknown Unknown	Unknown
Overall Totals	£14,302,91 0- 14,802,910	£3,739,982 Unknown	Unknown

Coastal Protection and Flooding

Project	Priority	Lead Provider	Approximat e Cost	Non- Developer Funding Sources	Potential Non- Developer Funding Amount	Required Developer Contributio n	Type of Developer Contributio n	Potential Remaining Funding Gap	Potential Funding Sources to Fill Gap	Timescale/ Progress	Status	Comments
Deben Estuary - Renovation of Flood Defence Wall Flood Cell 01 - Preliminary Work	Desirable	The Deben Estuary Partnership	£1,200,000	The Deben Estuary Partnership and enabling development	£1,073,800	£126,200	CIL	£O	None	Short term		DCIL Funding 2018/19
Projects listed under the Lowestoft Flood Risk Management Strategy	Essential	East Suffolk Council	£32,000,000	Local Enterprise Partnership, Suffolk County Council, DEFRA, Regional Flood and Coastal Committee, National Grant	Likely £32,000,000 dependant on final cost.	£O	CIL	£O	None	Short term		Tidal walls construction began in April 2021 to complete in May 2022.
Flood mitigation at Land South of Carlton Colville (WLP2.16).	Critical	Suffolk County Council	£379,000	Unknown	£O	£379,000	Section 106	£O	None	Medium term		To be delivered with site
Increasing flood mitigation measures along the River Orwell and the Port of Felixstowe.	Critical	Suffolk County Council, Anglian Water, Environment Agency, Developer	Unknown	Local Enterprise Partnership, Suffolk County Council, DEFRA, Anglian Water, Environment Agency	Unknown	Unknown	CIL	Unknown	Unknown	Over entire plan period		

Totals	Ap Co	ost	Potential Non- Developer Funding Amount	Required Developer Contributio n		Potential Remaining Funding Gap	
Total	£3	32,379,000	£32,000,000	£379,000	:	£0	
Total	£1,	1,200,000	£1,073,800	£126,200	:	£0	
Total	No	one	None	None		None	
Overall Totals	£3	33,579,000	£33,073,800	£505,200	:	£0	

Glossary

Dates when information was originally collated

Waveney Projects	2018
Suffolk Coastal Projects	2019

Status

Completed
In Progress
Not started
No longer to be delivered

Area to be delivered

Waveney Local Plan
Suffolk Coastal Local Plan
Neighbourhood Plan

Priorities

Critical	Infrastructure needed to unlock development sites (i.e. development cannot take place until this project is delivered)
Essential	Infrastructure necessary to support development and mitigate impacts. Without this the developments' sustainability would be undermined
Desirable	Infrastructure that could support development and make it more sustainable, but development would be sustainable without it

Timescale/Progress

Short Term	0-5 years
Medium Term	5-10 years
Long Term	Over 10 years
Plan Period	Present day - 2036

Definitions

CIL (Community Infrastructure Levy)	A charge levied by local authorities on new development to raise funds for infrastructure to support new development
Section 106	Legal agreements between local authorities and developers which can be used to ensure the delivery of specified infrastructure. Can also be known as planning obligations
Section 278	Legal agreements between local authorities and developers to make permanent alterations or improvements to public highways as part of a planning approval – the requirement to enter in to a Section 278 agreement is usually secured through a planning condition.
Pre-School setting	A setting that accommodates up to 30 pre-school aged children. This can be a singular building/space, or attached to existing schools
Enterprise Zone Pot B	A proportion of the collected business rates which is then used to invest in infrastructure for development of the Enterprise Zones
Anglian Water Asset Management Plan	A plan of investment programmes covering aspects such as maintenance and climate change
ISPA (Ipswich Strategic Planning Area)	A group made up of representatives from Ipswich Borough, Mid Suffolk and Babergh and East Suffolk which focusses on cross-boundary planning issues
Prudential Borrowing	When the debt incurred by local authorities is no longer capped, however the borrowing must follow the Prudential Code

Links

Waveney Local Plan	https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Waveney-Local-Plan-including-
	Erratum.pdf
Suffolk Coastal Local Plan	https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/suffolk-coastal-local-plan/local-plan-review/
Waveney Infrastructure Study	https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Final-Draft-Local-Plan/Infrastructure-Study.pdf
Waveney CIL Charging Schedule	https://www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/cil-rates-in-the-former
	-waveney-area/
Suffolk Coastal CIL Charging	https://www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/cil-rates-in-the-former
Schedule	-suffolk-coastal-area/
Summary of District CIL Bids Received 2021

Ref	Location/ Project	Lead Party	Benefits of the Project	Project Cost	DCIL requested	Other funding	Notes/Key Points	Recommendation
2021-1	Foxhall HWRC improvements	Suffolk Council Waste	 The current Foxhall Recycling Centre serves a large area of the East Suffolk population and is already in need of redevelopment in order to stay in place as it is operating at capacity. This project aims to expand and improve the Recycling Centre providing a faster throughput, more efficient service, increased safety for the public users and enhancing the recycling and reuse service provision. Key improvements: Widening Foxhall Road to create a right turn layby from the Ipswich direction. Widening of the existing access to site along with additional highway signage to improve the safety of the junction. Relocation of the Reuse shop to a new compound area which will comprise the Reuse Shop, designated car park and office/welfare facility allowing the shop to run independently to the remaining site. Creation of a larger split-level skip area, to enable safe disposal of household waste items in the high -level area without having to access steps. The site staff can control access by a gate system allowing skips to be emptied safely on the lower area by the site operatives. This maintains the operation of the waste site throughout the day 	£ 6,498,193 (estimate)		£5,700,000	 VALID BID £794,414 (11.3%) DCIL requested – at detailed cost phase 2 – based on project cost of £6,500,000/ 36,461 households (no. of all households projected to be served by Foxhall HWRC) = £178 / dwelling. This project is detailed in the Local Plan and in the IFS as a planned short term 'Essential' project to support housing growth. The amount of developer contributions expected as funding towards the project is £1,000,000. The project is detailed on page 55 of the 2019-20 Infrastructure Funding Statement, which is a new statutory document that details East Suffolk's intentions for spending CIL and s106 and the timing and nature (Critical/Essential/Desirable) of the project to support the planned housing growth. The project is an 'Essential' short term project. East-Suffolk-Infrastructure-Funding-Statement-2019-20.pdf (eastsuffolk.gov.uk) The Suffolk Coastal Local Plan references the need for expansion of the Foxhall Road HWRC at 12.226, 12.243, 12.352, 12.368, 12.463, 12.475, 12.475, 12.551, 12.566, 12.633, 12.676, 12.694, 12.706, 12.719, 12.764, 12.774, 12.808, 12.818, and on page 476. East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf (eastsuffolk.gov.uk) The original estimated contribution from CIL was £1m, but due diligence work on the catchment housing sites that have already commenced and the proposed growth for the catchment area over the next ten-year period equates to funding of £794,414 (the current bid value), directly relating to catchment growth (ie numbers of new homes in East Suffolk) as a calculation against the project cost. 	Approve

			 and ensures that large vehicle activities operate separately to public activity areas. Adding an extended one-way system around the site to improve traffic management on and off the site, allowing adequate queuing zones to be formed. Creation of additional areas of access to a range of recycling containers and chargeable waste containers. Both areas will have drive-in parking zones to maintain a clear flow of traffic along the one-way system. Improvements to drainage, site stability, security, staff welfare facilities and signage 			 Key Points The project directly relates to the Strategic Plan Environment objective of <i>minimising waste, reusing materials and increasing recycling</i>; reduced refuse volumes and increased recycling rates and also the Economy objective to <i>support and deliver infrastructure</i>. This is planned essential infrastructure project which we expected to partially fund from CIL (Local plan/IFS). This is a collaboratively funded Project with the DCIL requested being 11.3% of project costs. It is "oven ready" as the project has planning permission and is an approved SCC Capital project. Commencement is due on site in October 2021. SCC confirm in their application that the project will deliver household waste recycling service to the catchment until 2043. 	
2021-2	Bungay High School Expansion	Suffolk County Council Education	The project expands the school to provide a further 150places (from 900 to 1050 for ages 11-16) in order to meetthe demand for school places from local children, fromnew housing in the catchment area.Key improvements:• The expansion works will include a newstandalone block on the school site and theremodelling of existing school spaces. Theaccommodation to be provided is IT class basesand a dining space with new kitchen.	£3,700,779 (estimate)	£624,070	£2,271,000VALID BID - subject to planning approval£624,070 (16.86%) DCIL requestedThis is a Phase 2 Project (of 3) with Phase 1 already delivered and funded by SCCThe project is detailed as a planned 'Essential' short term project to support housing growth in the East Suffolk Waveney Local Plan and Infrastructure Funding Statement (IFS) 2019-20. It is detailed on page 53 of the 2019-20 IFS and the amount of developer contributions expected as funding towards the project is £142,650.	Approve in principle, subject to planning permission being obtained; or Approve (if planning permission is granted prior to 7 September)

		 In addition to the new accommodation, the external areas will be developed to support the expansion e.g. car parking etc. Whilst there are areas of the school that have community use this new block does not present further opportunities 			East-Suffolk-Infrastructure-Funding-Statement-2019-20.pdf (eastsuffolk.gov.uk)The East Suffolk Waveney Local Plan references the need for expansion of Bungay HighSchool at 5.3 on page 123 and 5.13 on page 128 and 5.22 on pages 129-130 and finallyin a generic fashion under Secondary Education on page 295.Adopted-Waveney-Local-Plan-including-Erratum.pdf (eastsuffolk.gov.uk)	
		for wider community use.			 Key Points: The project directly relates to the Strategic Plan Economy objective to Support and deliver infrastructure, enabling children to access education and to improve outcomes and contribute to society. By expanding local catchment schools this also reduces the need to transport children to alternative schools that are likely to be out of catchment area. It is routine to deliver extensions to schools via CIL contributions and this is a planned essential infrastructure project. The cost estimates are based on the number of places (150) x DfE basic need funding rate for secondary pupils (£19,301 per pupil) We are awaiting final costings but the amount of CIL requested is not affected as this relates to the calculation of the number of pupils generated from growth at the DFE cost rate used by SCC Education to request CIL in planning consultation responses. The project is expected to be "oven ready" with the outstanding planning permission due to be decided by approximately 5/08/21. Commencement expected October 2021, with payment in 2 stages March 2022 and October 2022 NOTE: Traffic concerns raised in consultation responses are to be addressed in expansion of the drop off area. 	
021-3 Halesworth - Edgar Sewter Primary School Expansion	Suffolk County Council Education	The school is expected to be at capacity by 2021/22, with more pupils in the school's catchment area than there are places at the school. This increase in demand is because of the forecast pupil numbers generated from new housing in the school's catchment area. The project	£1,431,036 RIBA Stage 2 cost estimate	£1,364,272	VALID BID £1,364,272 (95.3%) DCIL requested The project is detailed as a planned 'Essential' project to support housing growth in the East Suffolk Waveney Local Plan and Infrastructure Funding Statement (IFS) 2019-20.	Approve

		expands the primary school to provide a further 105 places (from 315 to 420) to meet the demand for school places from local children from new housing in the catchment area. The project feasibility has demonstrated that it is not possible to expand the Early Years places on the site, and this therefore links to the 2021-5 Bid from Holton St Mary Primary School. Key improvements:			It is detailed on page 97 of the 2019-20 IFS with expected developer contributions funding of £1,830,408. East-Suffolk-Infrastructure-Funding-Statement-2019-20.pdf (eastsuffolk.gov.uk The East Suffolk Waveney Local Plan references the need for expansion of Edgar Sewter Primary School at 4.7 on page 108 and under Primary Education on page 294 "Capacity for 106 additional pupils for schools in Halesworth and Holton" with expected developer contributions towards the project funding of £1,476,474. Adopted-Waveney-Local-Plan-including-Erratum.pdf (eastsuffolk.gov.uk)	
		Alterations within existing building to provide: • Larger staffroom 2 x Intervention Rooms • Expansion of an existing DT room to become a Class base • Staff Work Room New Build (standalone block) to include: • 2 x class bases • Library • Unisex WC • SEN Resource Room • MI Room • Accessible WC • Store (cleaners) • Plant Room External improvements: • Additional hard play area • Additional cycle/scooter parking			 Key Points: The project directly relates to the Strategic Plan Economy objective to Support and deliver infrastructure, enabling children to access education and to improve outcomes and contribute to society. By expanding local catchment schools this also reduces the need to transport children to alternative schools that are likely to be out of catchment area. It is routine to deliver extensions to schools via CIL contributions and this is a planned essential infrastructure project. The contribution from CIL is £1,364,272 which is 95.3% of the estimated project cost and in the East Suffolk Waveney Local Plan the project was originally estimated to cost £1,476,474. The project is "oven ready" as planning permission is not required (actioned under permitted development rights). Commencement is planned for October 2021. Payment would be made in 2 stages March 2022 and October 2022 NOTE- cross reference to Bid 2021-5 below for planned early years in this growth area. NOTE – consultation response comments addressed within Application Form 	
2021-4 Haleswo 3G Pitch Grass Pi	n and Campus	The Campus sports and recreation facilities sit in a broader area known as 'Halesworth and Holton Healthy Neighbourhood', which is an allocated development site	£3,530,397	£1,641,997	£1,888,399 VALID BID – subject to planning permission and evidence of ongoing verification of costs (RIBA Stages) and acceptable community use agreement.	Approve in principle - subject to planning

		Ltd	 in the Waveney District Council Local Plan (2019). The Healthy Neighbourhood includes provision for around 215 new homes, which will be immediately adjacent to the sports facilities. The Local Plan also includes allocations in Halesworth for a further 750 new homes. The Campus project expects a significant proportion of these new households to make use of our sports facilities. The existing facilities are already being used by local football and rugby clubs and the new facilities are expected to provide provision also to local schools, other local sports clubs and Childrens Holiday Clubs. This bid application relates to the first phase of a development bringing much needed new sports and recreation facilities to Halesworth and surrounding parishes. The first phase of construction will cost £3,530,397, and will include: 1. Diversion of electrical power cables 2. A full sized, floodlit, all-weather pitch 3. Drainage and external infrastructure 4. Entrance visibility splay and section 278 works 5. Preliminaries and general conditions 6. Design fees 7. Interim grass pitch The project is part funded from the sale of land to Castlemeadow Care £1,300,000 			£1,641,997 (46.5%) DCIL requested The project is detailed as a planned short term 'Essential' project to support housing growth in the East Suffolk Waveney Local Plan and Infrastructure Funding Statement (IFS) 2019-20. It is detailed on page 151 of the 2019-20 IFS and the amount of developer contributions expected as funding towards the project is £1,500,000. East-Suffolk-Infrastructure-Funding-Statement-2019-20.pdf (eastsuffolk.gov.uk The East Suffolk Waveney Local Plan references the Halesworth Campus Sports facilities on pages 22, 107-110, 282 and 300. Adopted-Waveney-Local-Plan-including-Erratum.pdf (eastsuffolk.gov.uk) Key Points: • The project directly relates to the two Strategic Plan Economy objective to Support and deliver infrastructure and the Communities objective of Maximising health, well-being and safety in our District. • Planning permission DC/21/0007/FUL is pending but is unlikely to be approved before August 2021.	
2021-5	Holton - Holton St Peter Primary School new Early	Suffolk County Council Education	 This project will provide an additional 30 full time equivalent early years places for children from the age 2 at Holton St Peter Primary School. The additional accommodation will provide; 	£615,240	£615,240 (maximum)	£0 VALID BID - subject to planning approval & and evidence of ongoing verification of costs (RIBA Stages)	Approve in principle - subject to planning permission being

Years provision	 Classroom/activity space for up to 30 EYFS 	£615,240 – 100% funded from CIL	granted
	pupils at any one time,	Due to the delays in terms of establishing RIBA stage 4 costs and the timing of the	
	• Pupil WCs,	planning permission, an 'approval in principle' recommendation could be made with an	
	• Office Space,	allocation ceiling of £615,240 and with a restriction on release of CIL Fund payments to	
	 New entrance and lobby for the school. 	after the grant of planning permission.	
	• The provision will be open for full day care to	A new Early Years setting at Dairy Farm is detailed as an 'Essential' short/medium term	
	meet the needs of working families as well as	project, linked with other sites in Halesworth. There are concerns over the timing of the	
	providing funded sessions.	Dairy Farm site and feasibility of other sites in Halesworth have been investigated and	
	 Children who attend high quality early years 	ruled out, hence the need to advance the Holton St Peter project.	
	provision are better able to achieve their full	It is detailed on page 43 of the 2019-20 IFS, with expected developer contributions	
	potential.	funding of £1,230,480 (identified for Dairy Farm).	
	 In a 2020 survey undertaken by the Early Years 	East-Suffolk-Infrastructure-Funding-Statement-2019-20.pdf (eastsuffolk.gov.uk	
	and Childcare Service (Suffolk County Council),	The East Suffolk Waveney Local Plan references the need for Early Years provision in the	
	76% of parents stated that they search for	Holton and Halesworth Area on page 106 to 120 and point 4.39 on page 188. Page 292	
	childcare near to their home address. 73% of	of the infrastructure Delivery framework in the Waveney Local Plan shows that initial	
	respondents stated that they need childcare in	funding required was £500,000. This was increased significantly in the IFS for 2019-20. Adopted-Waveney-Local-Plan-including-Erratum.pdf (eastsuffolk.gov.uk)	
	order to carry out their employment.Following a site visit with the Academy Trust and		
	Governors we are now looking to develop a facility design similar to that shown in Appendix B.	Key points:	
		The project directly relates to the Strategic Plan Economy objective to Support	
		and deliver infrastructure, enabling children to access early years education and	
		to improve their outcomes and to support working parents.	
		 Demand for EY places from development is considered to be 51/52 required 	
		places. This project will deliver an additional 30 full time equivalent early years	
		places for children from the age 2 at Holton St Peter Primary School.	
		 The need for EY provision in the area is detailed as a planned 'Essential' project 	
		to support housing growth in the East Suffolk Waveney Local Plan and	
		Infrastructure Funding Statement (IFS) 2019-20.	
		This project will appear as complimentary to the proposed Dairy Farm Early	

2021-6	Dennington –	Badingham	Badingham Playschool has been granted planning	£1,587,496	£1,178,252	£16 /19/	 School and Community Centre at WLP4.5 on the Dairy Farm site. There is concern that this site will not come forward quickly enough to address the above approved housing applications. Other sites have been considered: Edgar Sewter School – A feasibility has demonstrated that there is insufficient space on the school site to either expand the School Nursery or Edgar Sewter Pre School. Halesworth Day – Not able to expand and is leased by a private individual to the day Nursery. Suffolk County Council Early Years Service support the delivery of this project. There are a number of applications within the area still to be determined. Once the 30 places created at Holton St Peter are deducted, this would still mean that a further 31 places may be needed. This future growth will be monitored and if needed, further provision will be added, with the possibility at the Dairy Farm site. Parents and neighbouring schools will feed into a consultation that the School must carry out to receive Regional School's Commissioner approval to expand. Planning permission is estimated to be decided in May 2022. 	Approve in
							 concern that this site will not come forward quickly enough to address the above approved housing applications. Other sites have been considered: Edgar Sewter School – A feasibility has demonstrated that there is insufficient space on the school site to either expand the School Nursery or Edgar Sewter Pre School. Halesworth Day – Not able to expand and is leased by a private individual to the day Nursery. Suffolk County Council Early Years Service support the delivery of this project. 	
							 Years project and have its own line within the 2020-21 IFS. it is Essential infrastructure planned as a short-term project. The contribution from CIL is £615,240, which is 100% of the estimated project cost. The cost estimate of £615,240 is based on the number of places (30) x DFE Early Years cost of £20,508 per place. We are awaiting final costings but the amount of CIL requested could be 	

Early Years	field opposite Dennington village hall.	estimate)		maximum value
Playschool	The planned new infrastructure supports new housing			subject to furth
setting	that has been built in Dennington, Badingham,			information be
	Framlingham and surrounding villages. It also supports		The need for Early Years provision in the Framlingham area is detailed as an 'Essential'	provided.
	employment growth in this rural area by providing		priority to support housing growth in the East Suffolk Waveney Local Plan and	
	essential early years childcare and holiday care for		Infrastructure Funding Statement (IFS) 2019-20.	
	primary aged children for working parents/grandparents			
	and flexible employment opportunities for local people.		It is detailed in the East Suffolk - Suffolk Coastal Local Plan (12.272) page 286 and page	
	The new building is designed to mitigate the impact on		East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf (eastsuffolk.gov.uk)	
	the environment, by having larger windows on the south			
	side to give good natural light and warmth from the sun.		New Early Years provision is also detailed as a priority in the Framlingham	
	It will be heated by an air source heat pump. There will		Neighbourhood Plan.	
	be suitable levels of insulation the use of		Framlingham-NP-Made-Version-March-2017-Policy-title-text-AP22-Vyces-Rd-edited-	
	hard standing will be minimised to lessen runoff from		2017-7-18.pdf (eastsuffolk.gov.uk)	
	rain. The building aesthetic is designed to fit in			
	with the local area. The proposed planting is native			
	hedges and trees to improve biodiversity. This facility will		A project for a new Early Years setting is detailed on page 96 of the Infrastructure	
	provide a comprehensive local service so that families		Funding Statement for 2019-20, with expected developer contributions funding of	
	don't have to travel further to get the childcare they		£393,192.	
	need.		East-Suffolk-Infrastructure-Funding-Statement-2019-20.pdf (eastsuffolk.gov.uk	
	The Playschool has Charity status and provides high			
	quality, affordable, flexible early years education		Key points:	
	opportunities for all young children in the area. Playschool is fully inclusive and welcomes families from			
	all parts of our society. Playschool has been open		The Badingham Playschool Group is a Community Interest Company, and as such	
	throughout the pandemic and is still welcoming new		has charitable status.	
	children at their temporary premises in Framlingham.		 The project directly relates to the Strategic Plan Economy objective to Support 	
			and deliver infrastructure, enabling children to access early years education and	
			to improve their outcomes and to support working parents.	
			 Permission for the new facility has already been approved under 	
			DC/20/5019/FUL.	

							 Suffolk County Council Early Years Service support the delivery of this project. The Badingham Playschool Group have been proactive in raising funds towards the project from several different sources and have to date raised just over £16k in confirmed contributions. They are awaiting a decision on a request for a Neighbourhood CIL (NCIL) Allocation from Framlingham (25% of project cost after deduction of the confirmed the funding/grants) and the decision on this is expected in September 2021, after the 7 September Cabinet date. Badingham have decided not to allocate NCIL to this project and Dennington only have £380 NCIL currently available. RISK: if Framlingham Town Council were to decide not to approve NCIL funding of less than 25% of project costs for this priority infrastructure project, this could risk the timely delivery of the project. The VAT position is due to be confirmed by HMRC to the Playgroup as a CIC. If favourable, this could reduce the amount of District CIL required to support the project. The amount of CIL requested is set at a ceiling amount excluding the value of the requested Neighbourhood CIL contribution. 	
2021-7	Leiston – The Leiston Surgery	Ipswich & East Suffolk CCG	 The project scope is still to be fully determined but it is anticipated the following will be provided: Internal reconfiguration of space and repurposing of areas will create: Up to 4 additional clinical spaces A multi use room for social prescribing, counselling and also as a private digital consultation space for patient use. Repurposing of admin accommodation to create confidential space for the increased telephone consultations/conversations. 	£90,000 (estimate including VAT)	£90,000 (maximum)	£0	 VALID BID – subject to final confirmation of costs, VAT position, NHS approval £90,000 (100%) District CIL requested The project is detailed as a planned 'Essential' project to support housing growth in the East Suffolk Waveney Local Plan and Infrastructure Funding Statement (IFS) 2019-20. It is detailed on page 134 and 135 of the 2019-20 IFS, with expected developer contributions funding of £692,300 (covering multiple expansions). <u>East-Suffolk-Infrastructure-Funding-Statement-2019-20.pdf (eastsuffolk.gov.uk</u> The East Suffolk Waveney Local Plan references the need for enhancements to Leiston surgery as a result of new growth. It is detailed on pages 335, 350, 353, 377, 388, 419 and 422. Page 492 highlights the need for additional floorspace at Leiston Surgery as an 'Essential' priority. 	Approve in principle at £90,000 ceiling allocation, subject to further information being provided.

Agenda Item 10

ES/0869



CABINET

Tuesday, 07 September 2021

Subject	Joint Coastal Projects Board
Report by Councillor David Ritchie	
	Cabinet Member with responsibility for Planning and Coastal Management
Supporting	Sharon Bleese
Officer	Coastal Manager (South)
	Sharon.bleese@eastsuffolk.gov.uk
	07990 793662

Is the report Open or Exempt? OPEN

Category of Exempt	Not applicable
Information and reason why it	
is NOT in the public interest to	
disclose the exempt	
information.	
Wards Affected:	Gunton & St Margarets
	Aldeburgh and Leiston
	Kirkley and Pakefield
	Lothingland

Purpose and high-level overview

Purpose of Report:

Over the last two years Corton & Gunton, Pakefield and Thorpeness have experienced increased rates of erosion. This rate of erosion is impacting upon homes, businesses and the communities in these areas. Three projects have been initiated to capture and review data and evidence around coastal processes and to assess options. In addition, Shoreline Management Plan policies are being examined.

Partial project governance has been established. A Project Team has been established for each project. For the Pakefield and Thorpeness projects there are established community steering groups. The Suffolk Coast Forum has provided overview of progress to date and will continue to do so to completion.

Establishing a full, clear open, honest and transparent governance structure is crucial to decision making. Best practice for other projects such as the Gorleston to Lowestoft Coastal Strategy has ensured that decisions made about future coastal management are open to scrutiny, giving confidence to communities and statutory partners such as the Environment Agency and Natural England.

This paper, referring to Appendix 1. Draft Terms of Reference sets out the aims and objectives of a proposed joint coastal project board. It acknowledges that a project level board for each geographical area is likely to require commitment of time and attendance from a similar pool of Members, officers and partners. The paper then seeks to minimise that commitment whilst retaining a comprehensive route for decision making.

The commitment to attend a joint Board would be four meetings per year. Separate boards for each project would result, for some Members, officers and partners, in a further eight meetings per year.

Options:

Option 1. A Joint Coastal Project Board is formed to complete the governance structure for projects in progress in Corton & Gunton, Pakefield and Thorpeness. This would limit attendance to four Board meetings per annum.

Option 2. The formation of three separate Project Boards, covering the project areas.

Option 3. No Project Boards are formed for these project areas and governance is restricted to the main project team, community steering groups and overview from the Suffolk Coast Forum members.

Recommendation/s:

That Cabinet approves the formation of a single Joint Coastal Project Board to provide scrutiny and guidance to the three on-going projects in Corton & Gunton, Pakefield and Thorpeness. This will be an executive group with no financial/budgetary responsibilities but would provide recommendations to Cabinet at relevant stages in each project's progress. The Joint Coastal Project Board would comprise of Members covering the interests of the coastal communities involved. It is suggested that the following Members would constitute the Board's make-up, supported by senior officers:

Cllr David Ritchie; Cllr Mary Rudd; Cllr Keith Patience (representing Lowestoft Town Council); Cllr Peter Byatt; Cllr Tony Cooper; Cllr Russ Rainger; Cllr Tom Daly.

Corporate Impact Assessment

Governance:

Partial project governance has been established. A Project Team has been established for each project. For the Pakefield and Thorpeness projects there are established community steering groups. The Suffolk Coast Forum has provided overview of progress to date and will continue to do so to completion.

ESC policies and strategies that directly apply to the proposal:

East Suffolk Council Constitution

East Suffolk Strategic Plan

East Suffolk Economic Growth Plan

Environmental:

Environmental studies and surveys and in some cases a full Environmental Impact Assessment will be carried out as appropriate. Liaison with critical organisations such as the Environment Agency, Suffolk Wildlife Trust, the RSPB and Natural England are ongoing.

Equalities and Diversity:

An Equality Impact Assessment is being undertaken for each project. The development of the appraisal work being undertaken has no impact. This may change as the impacts are further assessed once a preferred option has been identified, particularly if this means a significant change. Any option identified however, will be open to public scrutiny and seeks to enhance and enable inclusive growth and enhance community development.

Financial:

No implications

Human Resources:

No resource implications for the recommendation included in this report

ICT:

No implications.

Legal:

No legal implications for the recommendation included in this report.

Risk:

Each project has a full developed risk register. The Joint Coastal Project Board will regularly review that register with the Project team.

External Consultees:	the need for such a board formation. The community steering group for Corton to Gunton has yet to be formed as the project
	here has not progressed sufficiently at this stage.

Strategic Plan Priorities

this p	Example 2 Strategic Plan which are supported by proposal: <i>ct only one primary and as many secondary as appropriate)</i>	Primary priority	Secondar y priorities
T01	Growing our Economy		
P01	Build the right environment for East Suffolk		
P02	Attract and stimulate inward investment		\boxtimes
P03	Maximise and grow the unique selling points of East Suffolk		\boxtimes
P04	Business partnerships		
P05	Support and deliver infrastructure		
T02	Enabling our Communities		
P06	Community Partnerships		
P07	Taking positive action on what matters most		\boxtimes
P08	Maximising health, well-being and safety in our District		
P09	Community Pride		\boxtimes
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services		
P11	Making best use of and investing in our assets		
P12	Being commercially astute		
P13	Optimising our financial investments and grant opportunities		
P14	Review service delivery with partners		
T04	Delivering Digital Transformation		
P15	Digital by default		
P16	Lean and efficient streamlined services		
P17	Effective use of data		
P18	Skills and training		
P19	District-wide digital infrastructure		
T05	Caring for our Environment		
P20	Lead by example		
P21	Minimise waste, reuse materials, increase recycling		
P22	Renewable energy		
P23	Protection, education and influence	\square	
XXX	Governance		
XXX	How ESC governs itself as an authority		
How	does this proposal support the priorities selected?		
	· · · · · · · · · · · · · · · · · · ·		

Growing our Economy

1. Attract and stimulate inward investment

In the 2019 House of Lords Select Committee on the regeneration of coastal towns it was recognised that, to attract inward investment into coastal areas, it is crucial to manage coastal change. Managing coastal change effectively requires a periodic review of evidence, data and policy to ensure that the right decisions are being made for the future of that area and that protection or adaptation maximises opportunities for future growth

to the local economy. The proposed Joint Coastal Projects Board will provide overview of the current review process, keeping local economy as one of the important areas of focus.

2. Maximise and grow the unique selling points of East Suffolk

Arguably, the jewel in East Suffolk's crown is its beautiful coast; wild and untouched in some areas and developed to accommodate the growth of coastal communities in others. Whether natural or populated, the coast requires review and management to ensure that actions taken or plans for adaptation enhance this most unique of selling points. The proposed Joint Coastal Projects Board will provide overview of the current review process, keeping the coastal environment as one of the important areas of focus.

Enabling our communities

1. Taking positive action on what matters most.

Our coastal communities need to feel reassured that we are supporting the management of the Suffolk coast. Suffolk has one of the fastest eroding coastlines in western Europe. The 2021 Intergovernmental Panel on Climate Change (IPCC) report recognises the increased risk to coastal communities of increased erosion. The projects in Corton & Gunton, Pakefield and Thorpeness are conducting important reviews of coastal processes and determining options for the future of those coastal communities. The proposed Joint Coastal Projects Board will provide overview of the current review process, keeping coastal change and potential options for coastal communities as critical areas of focus.

Caring for our environment

1. Protection, education and influence

As previously mentioned, our coastal communities need to feel reassured that we are supporting the management of the Suffolk coast. Managing the coast is not necessarily building hard defences; this may not be an appropriate course of action. Coastal processes, environmental considerations and financial constraints may mean that, longer-term, we will need to work with our coastal communities to create options for an alternative future, an adaptation of their community. Adopting adaptation pathways takes time. Coastal communities need to feel that they are architects of change not victims of change. This means working closely with them to explore data, evidence and potential options. The proposed Joint Coastal Projects Board will provide overview of the current review process in Corton & Gunton, Pakefield and Thorpeness, supporting conversations around coastal change and potential options for coastal communities as critical areas of focus.

Background and Justification for Recommendation

1	Background facts
1.1	Over the last two years Corton & Gunton, Pakefield and Thorpeness have experienced increased rates of erosion. This rate of erosion is impacting upon homes, businesses and the communities in these areas. Three projects have been initiated to capture and review data and evidence around coastal processes and to assess options. In addition, Shoreline Management Plan policies are being examined.
1.2	There is an urgency amongst the communities in these areas to move forward swiftly to identify what options are available. Project start for each area was impacted upon by delays caused by COVID 19. However, all projects have made good progress since November 2020 despite those difficult circumstances.
1.3	In 2016 the Environment Agency approved the Gorleston to Lowestoft Coastal Strategy. This was then approved by Waveney District Council Cabinet. The coastal strategy reviewed the management intent of the Shoreline Management Plans 6 and 7, covering the coast from Gorleston in the north to Pakefield in the south.
	The coastal strategy made recommendations for management actions based upon data gathered in 2014. Since then, erosion in Corton and Gunton has increased. The erosion in Gunton exposed oil on the beach from a spill from the Eleni V in the late 1970s. Anglian Water has critical infrastructure in this area, serving Lowestoft and Corton, which may potentially be impacted by the continued erosion.
	The initial options appraisal for the Corton & Gunton project began in November 2020, focusing first on Gunton and working in partnership with Anglian Water.
	At the time of approval in 2016 Pakefield benefitted from a significant beach. The recommendations of the coastal strategy therefore focused on the monitoring of beach levels suggesting if beach levels deteriorated to: If partnership funding is available: design new works, obtain permission and
	construct.
	If partnership funding is not available: carry out regular assessment of the erosion; engage with the local community on impacts and way forward; if necessary, develop adaptation and exit strategies.
	Over the four years since the approval of the coastal strategy beach levels at Pakefield have deteriorated significantly. This is largely due to Benacre Ness moving north at an approximate rate of 50 to 80m per annum, bringing with it a period of erosion ahead of the beach building again.
	Mott MacDonald were contracted in February 2021 to begin an options appraisal and Shoreline Management Plan review. Pakefield also continues to be regularly monitored by the Coastal Partnership East engineering team.
1.4	Thorpeness has experienced long periods of erosion. In 1976 gabion baskets were put in place by Suffolk County Council. In 2010 the community worked with Suffolk Coastal District Council and contributed funds to install geo-textile bags to help slow the erosion to the northern end of Thorpeness beach. This intervention was

	designed to last up to 20 years. Unfortunately, the increased erosion here has meant that the geo-textile bags have lasted less than 10 years.
	Royal Haskoning DHV were contracted in February 2021 to develop options for this frontage. It is accepted by the local community that any option will not be a long-term solution. The pressure on coastal processes and the need for a defence to be removed before it is detrimental to natural processes, means that the design life will be for no longer than 25 years with continual monitoring.
	The well-established community steering group (now a Community Interest Company) are raising funds to progress with a rock revetment.
1.5	It is note-worthy that all three projects are part of the Norfolk and Suffolk Coast Transition Programme (NSCT); either as a pilot area or a twinned area. NSCT was awarded £8.4m as a winning bid as part of Defra's Innovative Resilience Fund.

2	Current position
2.1	Partial project governance has been established for all three projects. A Project Team has been established. For the Pakefield and Thorpeness projects there are established community steering groups. The Suffolk Coast Forum has provided overview of progress to date and will continue to do so to completion.
2.2	Establishing a full, clear open, honest and transparent governance structure is crucial to decision making. Best practice for other projects such as the Gorleston to Lowestoft Coastal Strategy has ensured that decisions made about future coastal management are open to scrutiny, giving confidence to communities and statutory partners such as the Environment Agency and Natural England.
2.3	The projects for Corton & Gunton, Pakefield and Thorpeness are developing. They are at a crucial stage and would benefit from the additional advice and scrutiny that would be provided by a Project Board, ensuring a robust, clear and transparent governance structure.

3 How to address current situation

3.1 Option 1, forming a Joint Coastal Project Board, provides the best possible outcome for all three projects. The resource implications for Members, officers and partners are significantly less and therefore more likely to be possible in line with other commitment.

4 Reason/s for recommendation

4.1 The implementation of Option 1, the formation of a Joint Coastal Project Board, would support the Project Team in ensuring that critical pathways are met, and progress is made through the project stages in a timely manner. Meeting those critical pathways is vital in ensuring that the right actions and options are identified. Each of the projects have vulnerable, eroding frontages. Homes and

	businesses are at risk and that risk heightens each winter. It is therefore essential that we move forward swiftly with identifying options that are technically feasible, environmentally sounds and economically possible.
	It may not always be possible to defend eroding frontages. Adaptation pathways may need to be explored. Long-term master-planning may be a sensible approach. Options development as part of a project structure benefits from the scrutiny and challenge of a robust governance structure.
4.2	Best practice gathered from other coastal projects in East Suffolk such as the Gorleston to Lowestoft Coastal Strategy and the Lowestoft Flood Risk Management Project demonstrates that a robust governance structure supports decision making and aids liaison with partner organisations. In addition, communities and partners are reassured that decision making is sound when supported by good project governance.

Appendices

Appendices:						
Appendix A	Draft Terms of Reference					
Appendix B	Corton & Gunton project programme					
Appendix C	C Pakefield project programme					
Appendix	Thorpeness project programme					
D						
Appendix E	Appendix E Norfolk and Suffolk Coast Transition Plan Expression of Interest					

Background reference papers:							
Date	Туре	Available From					
	Gorleston to Lowestoft Coastal Strategy	www.coasteast.org.uk/projects					
	Shoreline Management Plan 7 – Lowestoft	Shoreline Management Plan 7					
	Ness to Landguard Point	(suffolksmp2.org.uk)					
	Pakefield progress report	www.coasteast.org.uk/projects					
	Thorpeness progress report	www.coasteast.org.uk/projects					

Joint Coastal Project Board Corton/Gunton/Pakefield/Thorpeness Terms of Reference (9th August 2021)

1. Introduction

These terms of reference are for the Joint Coastal Project Board, covering projects in Corton, Gunton, Pakefield and Thorpeness. The Board are responsible for providing an oversight of the projects relating to the coast from Corton in the north to Thorpeness in the south, taking into consideration the Gorleston to Lowestoft Coastal Management Strategy and the relevant Shoreline Management Plan (SMP) policies (SMP7). Both the coastal strategy and the SMP have been endorsed by East Suffolk Council and formally signed off by the Environment Agency.

The role of the Board is in the context of a wider Governance Structure, which includes an officerled Project Teams and community-led stakeholder groups. The projects are all partnership, encompassing a range of flood and coastal risk management issues that require the involvement of community and businesses locally.

Given the many elements involved in the project areas from Corton to Thorpeness and the number of local parishes, communities and businesses involved it is important that there is a Joint Coastal Project Board who are able to provide strategic direction to enable recommendations to be taken to the relevant authorities such as the East Suffolk Council Cabinet or the Environment Agency, provide guidance to the officer led Project Team and act as a democratically representative group on behalf of all those affected by the flood and coastal erosion risk issues encompassed by the studies and other related work happening in this area.

2. The Project Board is therefore required to:

- Support the partnership approach.
- Support and steer the Project Team and assist with opportunities and challenges faced by them.
- Challenge and endorse recommendations of the Project Team regarding potential options for flood and coastal erosion risk management in the project areas from Corton to Thorpeness.
- Ensure local people and businesses have had opportunity for appropriate involvement in the project(s) through an agreed communications strategies for each project.
- Make recommendations on funding requirement/spend.

1

• Ensure cost beneficial strategic flood and coastal risk management options are developed where it is appropriate to do so.

This will be achieved by.

- Attending 4 Board Meetings per annum
- Collaborative working at the Board meetings.
- Seeking wider views of those you represent outside of Board meetings
- Facilitating discussions outside of Board meetings, where appropriate, regarding funding and facilitating options that bring a wide range of benefits

3. Group Responsibilities and Membership

The Project Board will:

- Review tasks undertaken by the relevant Project Manager and Project Team and monitor progress at Board meetings and through updates.
- Have an understanding of the flood and coastal erosion risk issues and potential solutions (following presentations at Board meetings).
- Support the project team development of any FDGIA Business Cases, towards the delivery of flood and coastal erosion protection measures.
- Agree communications and public engagement strategies and action plans for each project.
- Support the project(s) with engagement opportunities, where appropriate and share feedback from stakeholders and partners.
- Identify any other relevant work that might need to be included in the project(s) or linked to other projects as part of the delivery of flood and coastal erosion risk management work in this area.
- Identify any opportunities that could be encompassed within the project(s).
- Identify other sources of funding and flag opportunities to the project team.
- Highlight any technical, social, economic or political risks to developing any of the projects or work in this area.

Membership of the Project Board includes:

2

- Corton Parish Council
- Lowestoft Town Council
- Thorpeness Parish Council
- Suffolk County Council (Highways, Lead authority for Rights of Way and Lead authority for Archaeology, Lead Local Flood Authority)
- East Suffolk Council (Lead Planning Authority/ Coast Protection Authority)
- Environment Agency
- Natural England
- **o** Nominated District councillors
- Anglian Water

4. Governance.

The Project Team will report to the Project Board with technical information, communication and funding activities and feedback and development of preferred solutions or next steps depending on the project involved. The Project Team will highlight project risks to the Board for their consideration. The Project Board will also receive feedback from the community steering groups following local engagement activities.

Key matters for Project Board Governance.

- 1. The Chairman of the Board will be chosen from its members and elected on an annual basis.
- 2. Each member appointed to the Board will be afforded a vote except that the Chairman of the Board will be afforded a casting vote in the event of a tied vote.
- 3. Where a member is not able to attend a meeting, substitute provision from the same organisation is encouraged.
- 4. The quorum for meetings will be 5 Board members
- 5. In attending Board Meetings, it is assumed that each member has the backing of their respective organisations and can speak on their behalf excepting that funding decisions may need to be referred back to the relevant organisation.
- 6. Board Meetings are not open to the public nor press to attend.

Appendix B: Corton & Gunton project programme

1 G	unton and Corton Option Appraisal	254 days	Thu 05/11/20	Tue 26/10/21	Nov De	ec Jan	Feb	Mar Apr
2	Project Start up	34 days	Thu 05/11/20	Tue 22/12/20	—	-		
3	Award of contract	1 day	Thu 05/11/20	Thu 05/11/20	• 05/11	-		
	Mobilisation	28 days	Mon 09/11/20	Wed 16/12/20		L		
5	Mobilisation meeting	5 days	Wed 16/12/20	Tue 22/12/20		_		
	Project set up	31 days	Fri 06/11/20	Fri 18/12/20	_ ↓			
	Data gathering and assessment	30 days	Mon 04/01/21	Fri 12/02/21		·		
	Provision of monitoring data	10 days	Mon 04/01/21	Fri 15/01/21		·	•	
	Obtain latest environmental data etc	15 days	Mon 04/01/21	Fri 22/01/21				
))	Analysis of monitoring data (original) and coastal processes	20 days	Mon 18/01/21	Fri 12/02/21		• •		
	Appraisal of options - Gunton (AW frontage only)	76 days	Mon 08/02/21	Mon 24/05/21		_		
	Assess erosion risk	25 days	Mon 08/02/21	Fri 12/03/21				
2 3	Additional topographic survey	25 days	Fri 12/03/21	Thu 15/04/21				
	Revised analysis of erosion risk	10 days	Fri 16/04/21	Thu 29/04/21				
	Identify and assess strategic options	6 days	Fri 30/04/21	Fri 07/05/21				
	Produce technical note for AW frontage	5 days	Mon 03/05/21	Fri 07/05/21				
	Issue draft TN for CPE and AW review	0 days	Fri 07/05/21	Fri 07/05/21				
	Review by AW and CPE	10 days	Mon 10/05/21	Fri 21/05/21				
)	Meeting/call to discuss	1 day	Mon 24/05/21	Mon 24/05/21				
	Further actions to be determined? (including engagement and SMP policy review)	0 days	Mon 24/05/21	Mon 24/05/21				
_	Additional geotechnical slope stability assessment	40 days	Mon 31/05/21	Fri 23/07/21				
-	Data gathering	5 days	Mon 31/05/21	Fri 04/06/21				
	Review of existing information	15 days	Mon 07/06/21	Fri 25/06/21				
	Site inspection	5 days	Mon 28/06/21	Fri 02/07/21				
	Assessment and analysis of problem	, 10 days	Mon 05/07/21	Fri 16/07/21				
	Identify potential options	5 days	Mon 12/07/21	Fri 16/07/21				
	Produce technical note/report appendix	5 days	Mon 19/07/21	Fri 23/07/21				
	Appraisal of options	60 days	Mon 24/05/21	Fri 13/08/21				
	Prepare coastal process report appendix	5 days	Mon 24/05/21	Fri 28/05/21				
)	Assess erosion risk	5 days	Mon 24/05/21	Fri 28/05/21				
	Identify and assess options	15 days	Mon 05/07/21	Fri 23/07/21				
<u>)</u>	Determine indicative costs	10 days	Mon 19/07/21	Fri 30/07/21				
	Appraise impacts	15 days	Mon 26/07/21	Fri 13/08/21				
	Assessment of economic damages	10 days	Mon 26/07/21	Fri 06/08/21				
5	Draft Report	35 days	Mon 02/08/21	Fri 17/09/21				
	Produce draft report	15 days	Mon 02/08/21	Fri 20/08/21				
,	Issue draft report for CPE review	0 days	Fri 20/08/21	Fri 20/08/21				
7 3	Review by CPE	10 days	Mon 23/08/21	Fri 03/09/21				
9	Meetings with local businesses, other key stakeholders and consultees	10 days	Mon 06/09/21	Fri 17/09/21				
	Finalise Report	27 days	Mon 20/09/21	Tue 26/10/21				
	Incorporate feedback from meetings	15 days	Mon 20/09/21	Fri 08/10/21				
	Presentation to Project Group (key stakeholders and consultees)	1 day	Mon 11/10/21	Mon 11/10/21				
	Presentation to SCF	0 days	Tue 26/10/21	Tue 26/10/21				
	Next stages	0 days	Tue 26/10/21	Tue 26/10/21				
	SMP Policy review? (to be determined)	0 days	Tue 26/10/21	Tue 26/10/21				
	Consultation events? (to be determined)	0 days	Tue 26/10/21	Tue 26/10/21				



Appendix C: Pakefield project programme

1	Pakefield Option Appraisal and SMP Policy Review	313 days	Tue 02/02/21 Fri 29/04/22	D J F M A M J J A S O N D J F I
2	Contract Dates	313 days	Tue 02/02/21 Fri 29/04/22	
3	Start Date	0 days	Tue 02/02/21 Tue 02/02/21	↓ _02/02
	Completion Date	0 days	Fri 29/04/22 Fri 29/04/22	
-	Planned Completion Date	0 days	Thu 20/01/22 Thu 20/01/22	20/01
-	Project mobilisation	50 days	Tue 02/02/21 Wed 14/04/21	Project mobilisation
-	Contract award	1 day	Tue 02/02/21 Tue 02/02/21	Contract award
-	Contract mobilisaition meeting (virtual)	1 day	Thu 11/02/21 Thu 11/02/21	Contract mobilisaition meeting (virtual)
	Mobilisation of team	5 days	Fri 12/02/21 Thu 18/02/21	Mobilisation of team
	RISK FLOAT: Mobilisation of team	5 days	Fri 19/02/21 Thu 25/02/21	RISK FLOAT: Mobilisation of team
-	Start up meeting	1 day	Thu 11/02/21 Thu 11/02/21	Start up meeting
2	Site Visit (when feasible)	1 day	Wed 14/04/21Wed 14/04/21	Site Visit (when feasible)
3	Stakeholder and community enagement	228 days	Tue 23/02/21 Thu 20/01/22	Stakehold
5 4	Monthly progress update	173 days	Thu 04/03/21 Thu 04/11/21	
• 1		-		Telecon/site visit with Natural England / Historic England
-	Telecon/site visit with Natural England / Historic England	1 day	Tue 23/02/21 Tue 23/02/21	Presentation of Stage 1 to the Project Group and local stakeholders
;	Presentation of Stage 1 to the Project Group and local stakeholders	1 day	Fri 19/03/21 Fri 19/03/21	Presentation of Stage 1 to the Project Group and local stakeholders
5	Presentation of draft Stage 2 to the Project Group and local stakeholders	1 day	Thu 06/05/21 Thu 06/05/21	
7	Presentation of the draft Option Appraisal to the Project Group and local stakeholders	1 day	Thu 10/06/21 Thu 10/06/21	Presentation of the draft Option Appraisal to the Project Group
3	Presentation of final Stage 2 to the Project Group and local stakeholders	1 day	Mon 14/06/21Mon 14/06/21	Presentation of final Stage 2 to the Project Group and local sta
9	Presentation of the final Option Appraisal to the Project Group and local stakeholders	1 day	Thu 26/08/21 Thu 26/08/21	Presentation of the final Option Appraisal to
)	Presentation of final options and SMP Review to Suffolk Coast Forum	1 day	Thu 20/01/22 Thu 20/01/22	Presentatio
	Preparation for public consultation meeting (Shortlist development and SMP Policy Review)	15 days	Thu 27/05/21 Wed 16/06/21	Preparation for public consultation meeting (Shortlist develo
2	Public consultation	1 day	Thu 17/06/21 Thu 17/06/21	Public consultation
3	1: Stage 1 Scope the SMP	29 days	Thu 11/02/21 Tue 23/03/21	1: Stage 1 Scope the SMP
4	Review previous SMP	3 days	Fri 26/02/21 Tue 02/03/21	TReview previous SMP
	Agreement on scope of review, stakeholder engagement and objectives in start up meeting		Thu 11/02/21 Thu 11/02/21	Agreement on scope of review, stakeholder engagement and objectives in start up meeting
6	Receive data from ESC	8 days	Fri 12/02/21 Tue 23/02/21	Receive data from ESC
7	Contact organisations for additional data	5 days	Fri 26/02/21 Thu 04/03/21	Contact organisations for additional data
3	RISK FLOAT: Reciept of data from organisations	5 days	Fri 05/03/21 Thu 11/03/21	RISK FLOAT: Reciept of data from organisations
, ,	Review data and undertake gap analysis	10 days	Fri 05/03/21 Thu 18/03/21	Review data and undertake gap analysis
_		-	Fri 12/03/21 Thu 18/03/21	Develop understanding of current coastal change trends and impacts
0 1	Develop understanding of current coastal change trends and impacts	5 days		Propose any additional data requirements such as bathymetry
	Propose any additional data requirements such as bathymetry	3 days	Fri 19/03/21 Tue 23/03/21	2: Stage 2 Assessments to suppor
2 3	2: Stage 2 Assessments to support policy development	146 days	Wed 24/03/21 Fri 15/10/21	Develop understanding of coastal processes that have potential to influence c
_	Develop understanding of coastal processes that have potential to influence coastal change	10 days	Wed Thu 08/04/21 24/03/21	
1	Volumetric assessment of sediment	10 days	Wed 24/03/21Thu 08/04/21	Volumetric assessment of sediment
5	Review latest erosion forecasts	5 days	Fri 09/04/21 Thu 15/04/21	Review latest erosion forecasts
,	Agree with ESC appropriateness of erosion forecast for this review	4 days	Fri 16/04/21 Wed 21/04/21	Agree with ESC appropriateness of erosion forecast for this review
7 3	Mapping of erosion NAI baseline Develop economic damages under NAI and current management scenarios	5 days 10 days	Thu 22/04/21 Wed 28/04/21 Thu 22/04/21 Wed 05/05/21	Mapping of erosion NAI baseline Develop economic damages under NAI and current management scenar
	Develop long list of options	5 days	Thu 22/04/21 Wed 28/04/21	Develop long list of options
)	Workshop to review SMP Stage 2 outputs, and agree a shortlist of options	1 day	Thu 06/05/21 Thu 06/05/21	Workshop to review SMP Stage 2 outputs, and agree a shortlist of optic
1	Summarise outcomes of the trends and reviews in SMP policy review report	10 days	Fri 07/05/21 Thu 20/05/21	Summarise outcomes of the trends and reviews in SMP policy review
2	Submit SMP Policy Review Report to ESC and Project Group	0 days	Thu 20/05/21 Thu 20/05/21	20/05
3	Review of SMP Policy Review Report by ESC and Project Group	10 days	Fri 21/05/21 Thu 03/06/21	Review of SMP Policy Review Report by ESC and Project Group
	Update and finalise SMP Policy Review Report	5 days	Fri 04/06/21 Thu 10/06/21	Update and finalise SMP Policy Review Report
5	Milestone workshop: Agree suitability of SMP and requirement for Stage 3	1 day	Fri 11/06/21 Fri 11/06/21	Milestone workshop: Agree suitability of SMP and requirement
6	RISK FLOAT: Decision on requirements for Stage 3	10 days	Mon 14/06/21Fri 25/06/21	RISK FLOAT: Decision on requirements for Stage 3

Project: Pakefield Programme f Date: Thu 18/02/21	Split		Project Summary	1	Inactive Summary	11	Manual Summary Ro	llup	Finish-only	3	Deadline	٠
	Milestone	•	Inactive Task		Manual Task		Manual Summary		External Tasks		Critical	
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	ask Name			Duration	Start	Finish	D	Half 1, 2021 J F	м	A	мјј	Half 2, 2021	s	O N D	Half 1, 2	F M
57	[Potential Additiona	I Task: Stage 3 Policy Development and Ca	binet Report]	80 days	Mon 28/06/21	Fri 15/10/21								Potential Addi	tional Ta	ask: Stage 3 Pol
58	3: Shortlist Option Dev	velopment		79 days		Wed 25/08/21				r	_	-	- 3: Short	list Option Develo	oment	
59	Develop shortlist op	tion concepts		10 days	Fri 07/05/21	Thu 20/05/21				ì	Develo	p shortlist op	otion concep	ots		
50	Development of wh	ole life costs		5 days	Fri 21/05/21	Thu 27/05/21					Deve	lopment of w	v <mark>ho</mark> le life co	sts		
51	RISK FLOAT: Develo	oment of whole life costs		3 days	Fri 28/05/21	Tue 01/06/21					👗 RISI	K FLOAT: Dev	elopment o	f whole life costs		
52	Economic assessme	nt of shortlist		5 days	Wed 02/06/2	1Tue 08/06/21					The Ec	onomic asses	sment of sh	ortlist		
53	Review of environm	ental and social impacts of shortlist		10 days	Fri 21/05/21	Thu 03/06/21					Rev	iew of enviro	onmental an	d social impacts of	shortlis	t
54	Multi Criteria Analys	is Workshop to determine preferred optic	on	1 day	Wed 09/06/2	1Wed 09/06/21					M	ulti Criteria A	Analysis Wor	rkshop to determin	e p <mark>r</mark> efer	red option
65	Production of Optio	ns Report including costing review		10 days	Thu 10/06/21	1 Wed 23/06/21	1					Production	of Options I	Report including co	sting re	view
66	Submission of Optio	ns Report		0 days	Wed 23/06/2	1Wed 23/06/21						23/06				
67	ESC and Project Gro	up review Options Report		10 days	Thu 24/06/21	1 Wed 07/07/21						ESC and	Project Gro	up review Options	Report	
58	Update and issue fir	al Option Report		10 days	Thu 08/07/21	1 Wed 21/07/21						Upda Upda	ite and issue	e final Option Repo	rt	
59	RISK FLOAT: Update	and issue of final Option Report		5 days	Thu 22/07/21	1 Wed 28/07/21						RIS	K FLOAT: Up	odate and issue of	inal Opt	tion Report
70	Agree preferred opt	ion and costs for outline design task		5 days	Thu 10/06/21	1 Wed 16/06/21					—	Agree preferr	red option a	nd costs for outlin	e design	task
'1	[Additional Task: Ou	tline design and drawings]		35 days	Thu 08/07/21	L Wed 25/08/21						\$	Additio	nal Task: Outline d	esign and	d drawings]
2	Environment and Soci	al , planning and consents		147 days	Fri 18/06/21	Thu 20/01/22										Environment
3	Land ownership			45 days	Thu 24/06/2	1 Wed 25/08/21							- Land ow	-		
4	Request land own	nership information		15 days	Thu 24/06/21	1 Wed 14/07/21								ership information		
5	RISK FLOAT: Requ	est land ownership information		10 days	Thu 15/07/21	1 Wed 28/07/21						RIS		equest land owners		
6	Review of outline	design against land ownership		5 days	Thu 12/08/21	L Wed 18/08/21						4		outline design aga		d ownership
7	Prepare land own	ership maps		5 days	Thu 19/08/21	L Wed 25/08/21							Prepare	land ownership ma	ps	
8	<u>EIA</u>			147 days	Fri 18/06/21	Thu 20/01/22					H	-				EIA
'9	Prepare screening	g letter		5 days	Fri 18/06/21	Thu 24/06/21					T	Prepare scr	eening lette	r		
0	Submit screening	letter		0 days	Thu 24/06/21	1 Thu 24/06/21						24/06				
1	Receive response	from screening letter from MMO		40 days	Fri 25/06/21	Thu 19/08/21						Ĭ		sponse from scree		
2	Receive response	from screening letter from LPA		15 days	Fri 25/06/21	Thu 15/07/21						Receiv	e response f	from screening lett	er from	LPA
3	Develop EIA Scop	ing Report		10 days	Fri 20/08/21	Thu 02/09/21								p EIA Scoping Rep		
4	RISK FLOAT: Deve	lop EIA Scoping Report		5 days	Fri 03/09/21	Thu 09/09/21							RISK	FLOAT: Develop El	A Scopin	ng Report
35	Submit EIA Scopir	ng Report to ESC and Project Group		0 days	Fri 10/09/21	Fri 10/09/21							10/0			
86	Review of EIA Sco	ping Report by ESC and Project Group		10 days	Mon 13/09/2	21Fri 24/09/21								eview of EIA Scopi		
7	Update EIA Scopi	ng Report		5 days	Mon 27/09/2	21Fri 01/10/21								Update EIA Scopin	g Report	t
38	Submit EIA Scopir	ng Report to LPA and MMO		0 days	Fri 01/10/21	Fri 01/10/21							1	01/10		
39	Statutory consult	ation period (LPA)		25 days	Mon 04/10/2	21Fri 05/11/21								Statutory		tion period (L
0	Statutory consult	ation period (MMO)		65 days	Mon 04/10/2	21Wed 12/01/22										atutory consu
1	Review feedback	from consultation		5 days	Thu 13/01/22	2 Wed 19/01/22										Review feedba
92	Submit final Scop	ing Report		1 day		2 Thu 20/01/22										Submit final S
93		and review of further EIA stages		1 day		2 Thu 20/01/22										inal presenta
4	Supporting docume	2510		146 days		Wed 19/01/22					t i				-	Supporting d
5		supporting documents		40 days		Thu 12/08/21					1	<u>s</u>		anning supporting	documei	nts
6	Water Framew			40 days		Thu 12/08/21					1			nework Directive		
7	Prepare WFI	-		10 days		Thu 01/07/21							VFD screenir	19		
8		screening to EA		0 days		1 Thu 01/07/21						01/07				
9		WFD screening		20 days		Thu 29/07/21								/FD screening	from	•
00		Delayed response from EA		10 days		Thu 12/08/21								: Delayed response	nom er	•
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2	HRA screening			40 days		Thu 12/08/21					1		IRA screenin	2		
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Appendix D: Thorpeness project programme



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Appendix E: Norfolk and Suffolk Coast Transition Plan Expression of Interest Internal briefing: The Norfolk & Suffolk Coast Transition Programme



1. Overview: The bidding process & announcement

A consortium, led by East Suffolk Council (ESC), with North Norfolk District Council (NNDC) and Great Yarmouth Borough Council (GYBC) has made a successful bid to Defra's 'Innovative Resilience Fund' to deliver the Norfolk & Suffolk Coast Transition Programme.

Approval from Environment Minister Rebecca Pow was granted on 26th March 2021 to proceed to the final business case stage, alongside 24 other successful national projects. Our bid proposed an £8M, 6-year programme to deliver coastal adaptation across 8 communities on the Norfolk and Suffolk coast. A public statement is being made on 29th March to announce the successful bids.

Defra will make £40k available to ESC for the development of the final business case to unlock the grant. As the project has successfully cleared the competitive stage and close support will be provided with the development of the business case, the final funding approval stage should be straightforward. We should therefore be reassured that the funding is relatively secure.

2. What is the Innovative Resilience Fund?

In the 2020 Budget, the government announced a £200 million fund for this programme. The programme will allocate £150 million of the £200 million to 25 local areas. For some, a local area might be a county, city, town or village. For others, a place could mean a river catchment, a tidal estuary or part of the coast. On average each area will receive £6 million between 1 April 2021 and 31 March 2027. With this funding, projects will demonstrate how practical innovative actions can work to improve resilience to flooding and coastal erosion. The programme is managed by the Environment Agency on behalf of Defra.

The aims of the innovative flood and coastal resilience programme are to:

- Encourage local authorities, businesses and communities to test and demonstrate innovative practical resilience actions in their areas.
- Improve the resilience of 25 local areas, reducing the costs of future damage and disruption from flooding and coastal erosion.
- Improve evidence on the costs and benefits of the innovative resilience actions and demonstrate how different actions work together across geographical areas.
- Use the evidence and learning developed to inform future approaches to, and investments in, flood and coastal erosion risk management.

3. What is the Norfolk & Suffolk Coast Transition Programme?

- Norfolk and Suffolk have some of the fastest eroding coasts in Europe, with over 2,500 homes at direct coastal
 risk and thousands more properties and businesses directly and indirectly affected by loss of property,
 infrastructure and utilities.
- Recent national reports and enquiries have recommended that more is done to support coastal adaptation and resilience. The framework for transitioning our coast is now in place. The Innovative Resilience Fund (IRF) proposal seeks to implement an ambitious resilience programme for the Norfolk and Suffolk coast, that delivers real adaptation and resilience options for our communities.
- The programme will offer a complete suite of planning, engagement, technical, financial and policy tools to support coastal transition for Norfolk and Suffolk communities, which could also be applied to the rest of the UK coast. Tangible, measurable and sustainable changes will be delivered in these locations. This will enable them to physically adapt to climate and coastal change now and for future generations.

The programme will be implemented in four core pilot locations across the Norfolk and Suffolk coast, plus four additional 'twin' locations. The work will be delivered in close collaboration with communities, alongside a multi-sector and national group of partner organisations with a proven track record of delivering tangible change within their sectors.

Additional information

A. Geographical areas of focus.



B. Project partners

This is a partnership project across Coastal Partnership East's three Coastal Management Authorities, East Suffolk Council (ESC), North Norfolk District Council (NNDC) and Great Yarmouth Borough Council (GYBC).

The bid was also supported by the following local and national multi-sector organisations. The intention is for these partners to be actively involved in the development / delivery / monitoring of the 6-year programme.

1. Tyndall Centre/University of East Anglia	2. Norfolk County Council Highways Department
3. Trimingham Parish Council	4. Hemsby Parish Council
5. Save Hemsby Coastline Community Group	6. Norfolk Coast AONB
7. Engagement Partner: GroundWork	8. Local Government Association Coastal Special Interest Group (LGA SIG)
9. Anglian Water	10. Finance & Insurance partner: Marsh
9. Anglian Water 11. Climate data partner: Grantham Research Institute, London School of Economics	10. Finance & Insurance partner: Marsh 12. Babergh District Council
11. Climate data partner: Grantham Research	· · · · · · · · · · · · · · · · · · ·

C. Coastal Partnership East officer leads

- Karen Thomas (Head of Coastal Partnership East)
- Paul Mackie (Bid Lead Officer, Strategic Funding & Development Manager)
- Rob Goodliffe (Adaptation Lead, Coastal Manager North)
- Sharon Bleese (Comms & Engagement Lead, Coastal Manager South)
- Tamzen Pope (Operational Delivery Lead)

EASTSUFFOLK

Agenda Item 11 ES/0868

CABINET Tuesday, 07 September 2021

Subject	Adoption of Residential Development Brief for WLP2.14 Land North of Union Lane, Oulton Supplementary Planning Document				
Report of	Councillor David Ritchie				
	Cabinet Member with responsibility for Planning and Coastal Management				
Supporting	Ben Wright				
Officer(s)	Planner (Planning Policy and Delivery)				
	Ben.Wright@eastsuffolk.gov.uk				
Anthony Taylor					
	Senior Planner (Planning Policy and Delivery)				
Anthony.Taylor@eastusffolk.gov.uk					
	Rachel Lambert				
	Planner (Major Sites and Infrastructure)				
	Rachel.Lambert@eastsuffolk.gov.uk				
	Laura Mundy				
	Principal Planner (Planning Policy and Delivery)				
	Laura.Mundy@eastsuffolk.gov.uk				

Is the report Open or Exempt? OPEN

Category of Exempt	Not applicable.
Information and reason why it	
is NOT in the public interest to	
disclose the exempt	
information.	
Wards Affected:	Oulton Broad

Purpose and high-level overview

Purpose of Report:

The purpose of this report is to adopt the residential development brief for WLP2.14 Land North of Union Lane in the East Suffolk Council - Waveney Local Plan.

The residential development brief is a Supplementary Planning Document (SPD). Once adopted, it will carry weight in the determination of any planning applications for this site. It highlights the considerations that any development on the site will need to respond to and outlines the Council's aims for the site whilst allowing for innovative design.

Options:

- Adoption of the residential development brief for WLP2.14 Land North of Union Lane, giving it weight in the determination of any planning applications. This will provide further context and considerations for development to ensure the best quality development can be achieved; or
- Do not adopt the residential development brief. The residential development brief will then carry no weight in decisions on planning applications on this site and decisions will be solely based on policies in the Local Plan. The additional context and considerations outlined in the residential development brief would therefore carry no weight.

Recommendations:

- 1. That the residential development brief for WLP2.14 Land North of Union Lane, Oulton (Appendix A) be adopted.
- 2. That the Head of Planning and Coastal Management, in consultation with the Cabinet Member with responsibility for Planning and Coastal Management, is authorised to make any presentational or typographical amendments to the residential development brief for WLP2.14 Land North of Union Lane, Oulton prior to it being published.

Corporate Impact Assessment

Governance:

No impacts.

ESC policies and strategies that directly apply to the proposal:

The residential development brief will be considered alongside the East Suffolk Waveney Local Plan (March 2019) when determining planning applications for the site (WLP2.14 Land North of Union Lane, Oulton).

Environmental:

The residential development brief details expectations of what development on this site should deliver in terms of environmental and biodiversity features, including the enhancement of existing green corridors and buffers, introducing new green corridors and retaining existing trees. The Strategic Environmental Assessment Screening concluded that a full Strategic Environmental Assessment was not needed. The final Strategic Environmental Assessment Screening Opinion is appended to this report (Appendix D). Habitat Regulations Assessment was also undertaken which concluded that any likely significant effects on protected Habitat sites would be mitigated against through the Council's Recreational Disturbance Avoidance and Mitigation Strategy. The final Habitat Regulations Assessment is appended to this report (Appendix E).

Equalities and Diversity:

The residential development brief was subject to an Equality Impact Assessment Screening Opinion before going out to public consultation, as is standard practice for all planning policy documents. It concluded no differential negative impacts on those with protected characteristics. This was updated following the changes made as a result of the consultation and again no differential negative impacts were concluded. The updated Equality Impact Assessment Screening Opinion is appended to this report (Appendix C) The residential development brief has also been subject to Equality Impact Analysis (ref: EQIA354374905), which concluded no differential negative impacts on those with protected characteristics.

Financial:

The production and adoption of the residential development brief is covered by the existing budget of the Planning Policy and Delivery Team.

Human Resources:

No impacts.

ICT:

No impacts.

Legal:

The SPD has been produced in accordance with the Town and Country Planning (Local Plans) (England) Regulations 2012 (as amended) and the requirements of the East Suffolk Council Statement of Community Involvement (2021).

An Equality Impact Assessment Screening opinion was produced to meet the requirements of the Equality Act 2010. The SPD has been subject to a Strategic Environmental Assessment Screening Opinion in accordance with the Environmental Assessment of Plans and Programmes Regulations, 2004. It has also been subject to a Habitats Regulation Assessment, in accordance with the Conservation of Habitats and Species Regulations, 2017 (as amended).

Risk:

There are no risks envisaged in relation to the implementation of the recommendations.

External Consultees:	As an SPD, the residential development brief was subject to full public consultation. The list of consultees, respondents and their
External consultees.	comments can be found in the Consultation Statement, which is attached to this report (Appendix B).

Strategic Plan Priorities

Select the priorities of the <u>Strategic Plan</u> which are supported by	Primary	Secondar
this proposal:	priority	У

(Sele	ct only one primary and as many secondary as appropriate)		priorities
T01	Growing our Economy	1	1
P01	Build the right environment for East Suffolk	\boxtimes	
P02	Attract and stimulate inward investment		
P03	Maximise and grow the unique selling points of East Suffolk		
P04	Business partnerships		
P05	Support and deliver infrastructure		\square
T02	Enabling our Communities		
P06	Community Partnerships		
P07	Taking positive action on what matters most		
P08	Maximising health, well-being and safety in our District		\boxtimes
P09	Community Pride		
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services		
P11	Making best use of and investing in our assets		
P12	Being commercially astute		
P13	Optimising our financial investments and grant opportunities		
P14	Review service delivery with partners		
т04	Delivering Digital Transformation		
P15	Digital by default		
P16	Lean and efficient streamlined services		
P17	Effective use of data		
P18	Skills and training		
P19	District-wide digital infrastructure		
T05	Caring for our Environment		
P20	Lead by example		
P21	Minimise waste, reuse materials, increase recycling		
P22	Renewable energy		
P23	Protection, education and influence		\boxtimes
XXX	Governance		
XXX	How ESC governs itself as an authority		
How	does this proposal support the priorities selected?		
The residential development brief highlights considerations for development on WLP2.14 Land North of Union Lane to ensure that any development is of high quality. The residential development brief will deliver against strategic plan priorities P01 and P08 and will help deliver the appropriate mix of housing and open space to support the local community. The residential development brief will also help deliver against priority P05 as infrastructure needs have also been highlighted to ensure associated requirements are delivered appropriately. The residential development brief will also help deliver against priority P23 by protecting and enhancing the environmental assets of the site.			

Background and Justification for Recommendation

1	Background facts
1.1	

	Residential development briefs are being produced for a number of allocations within both East Suffolk Local Plans. They highlight the considerations that any development on the relevant site will need to respond to and outline the Council's
	aims for each site without being prescriptive, allowing for innovative design. The
	residential development briefs once adopted will have weight in the determination of any planning application submitted for a respective site. Planning applications will be expected to demonstrate how the principles outlined in the residential development brief have been considered
1.2	development brief have been considered.
1.2	The residential development brief for Land North of Union Lane (Policy WLP2.14 of the East Suffolk Council – Waveney Local Plan) is the first to be produced and is using a template that was consulted on in spring 2020. The intention is that all following residential development briefs will follow a similar format.
1.3	There are two main elements to the Brief, the 'Development Consideration's and
	the 'Development Framework'. The 'Development Considerations' was the first section to be drafted, initially based on a desk-based analysis of existing site evidence and information available to the Council. These were further developed based on observations from a site visit conducted on 10 th December 2020. Once
	the development considerations were established, then the 'Development Framework' was drafted. This section outlines Council expectations for development. The expectations and information included in this section responds
	to the factors raised under the 'Development Considerations' section.
1.5	The preparation of the residential development brief was overseen by the Local
	Plan Working Group. During the preparation of the residential development brief a wide range of service areas were involved, including Planning Policy, Development
	Management, Major Sites and Infrastructure, Design and Conservation, Landscape, and Ecology. The Council also engaged with other stakeholders, including the landowner and their agent, Suffolk County Council and Oulton Parish Council.
1.6	A six-week consultation on the draft residential development brief took place between Monday 10 th May and Wednesday 23 rd June 2021. The consultation was initially scheduled to end on Monday 21 st June, however, a technical issue on that day meant that comments could not be submitted. The consultation period was extended to the Wednesday 23 rd June to mitigate this.
1.7	The draft residential development brief was presented primarily through the use
	of ArcGIS Storymap. Storymap presents documents in a flowing, visual medium
	which uses interactive maps to engage the audience and make documents more
	accessible to the public. The combination of Storymap and Inovem consultation
	software also allowed users to comment directly on specific sections of the
	document. The document, and it's supporting documents, were also available in
	PDF format. Further information on the consultation can be found in the
	Consultation Statement which is appended to this report (Appendix B).
1.8	In total 67 individuals and organisations responded to the consultation. Between them they made 114 comments. The main issues raised through the consultation
	 were: How features, such as the historic burial ground and access, should be considered.
	These had already been considered and acknowledged in the brief.
	 Concern relating to flooding, biodiversity and design.
	These had already been considered and acknowledged in the brief.
	Lack of collaboration between the developer and the Council (as suggested
	by some stakeholders who were involved in the creation of the brief).
	• Incorrect distances and directions of some services (as listed on page 9).
	• Concern over the need and deliverability of a tree lined, linear access road.

	• The infrastructure needs listed in the document should not be considered to be exhaustive.
1.9	 Changes have been made to the residential development brief to address many of the comments received, including: Changing the wording when referring to other stakeholders who were involved from 'collaboration' to 'engaged with'. Correction of the distances and directions of various services from the site (as listed on page 9). Rewording of paragraph 4.2 to reinforce the need for high quality landscaping along the linear access road. Addition of paragraph 4.9 to make clear that infrastructure needs outlined in the document should not be considered exhaustive.
1.10	Some additional changes were made as the residential development brief was being revised which did not directly relate to specific comments made during the consultation. These changes were not considered to be significant and clarified the existing position of the Council. These changes were:
	 Removal of other documents that need to be submitted with a planning application from the introduction. These should be covered by the policy and Local Validation List and do not need to be repeated. Addition of paragraph 1.11 highlighting the importance and need to consider self-build dwellings.
	 Removal of paragraph 2.2 due to repetition. Rewording of Paragraphs 4.16 – 4.18 to align closer with comments from Suffolk County Council Archaeology comments.
1.11	The final residential development brief is appended to this report (Appendix A).
1.12	Further details of the consultation undertaken are contained in the Consultation Statement, which is appended to this report (Appendix B).

2 Current position

2.1	The East Suffolk Council - Waveney Local Plan (March 2019) is currently used to determine planning applications on site WLP2.14 Land North of Union Lane, Oulton.
2.2	There is currently no other guidance to support decision making on this site. There are benefits in providing additional guidance for this site in terms of achieving high quality development.

3 How to address current situation

3.1	The residential development brief for WLP2.14 Land North of Union Lane, Oulton	
	has been developed to highlight the considerations that any development on the	
	site will need to respond to whilst achieving high quality design.	
3.2	In order for the residential development brief to have weight in the determination	
	of planning applications for this site, the brief should be adopted.	

4 Reason/s for recommendation

4.1 To ensure that the residential development brief for WLP2.14 Land North of Union Lane, Oulton has weight in the determination of planning applications for this site and to help achieve development of the highest quality.

Appendices

Appendices:				
Appendix A	Residential Development Brief – WLP2.14 Land North of Union Lane,			
	Oulton			
Appendix B	Appendix B Residential Development Brief – WLP2.14 Land North of Union Lane,			
	Oulton – Consultation Statement			
Appendix C	Equality Impact Assessment Screening Opinion			
Appendix	Strategic Environmental Assessment Screening Opinion			
D				
Appendix E	Habitats Regulations Assessment			

Background reference papers:				
Date	Туре	Available From		
July	Equality Impact	Available on Request		
2021	Analysis			
	(EQIA354374905)			
March	East Suffolk	https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-		
2019	Waveney Local	Local-Plan/Adopted-Waveney-Local-Plan-including-		
	Plan	Erratum.pdf		

Residential Development Brief

Policy WLP2.14 of the East Suffolk Council Waveney Local Plan August 2021


1 Introduction

The purpose of this brief is to provide a framework for the development of Land North of Union Lane, Oulton (Policy WLP2.14).

- 1.1 The site has been allocated for approximately 150 dwellings in the East Suffolk Council Waveney Local Plan. The principle of development on this site has therefore already been established, and this document sets out site-specific principles to guide development proposals and allow the site to proceed straight to a full application. This will help ensure that development on the site is appropriately designed in a comprehensive manner whilst meeting the aspirations and needs of both the local community and the Local Plan, in advance of a planning application being submitted for the whole site. This document should not be viewed as an alternative to the pre-application advice service
- 1.2 It has been prepared by East Suffolk Council. The landowner, Suffolk County Council and Oulton Parish Council were also engaged.
- 1.3 As a Supplementary Planning Document (SPD) it should be read in conjunction with the adopted Waveney Local Plan which forms part of the development plan for East Suffolk.
- 1.4 The brief has been prepared with a thorough examination of available evidence. However, further detail may come to light in the future, perhaps as part of assessments that support a planning application. It may be the case that such future evidence warrants a different approach to that proposed in this brief.
- 1.6 All applications will need to be supported by relevant documents and supporting evidence as required by the East Suffolk Local Validation Requirements.

- 1.8 The site is within Community Infrastructure Levy (CIL) Residential Charging Zone 3 for the former Waveney area. Therefore, a financial contribution of £89.20 (as of 1st March 2021) will be required per square metre of residential development. The levy will be used to deliver infrastructure to support new development in East Suffolk.
- 1.9 The site is within the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) Zone of Influence B and therefore, as the proposal creates new residential development, a financial contribution to the scheme (or equivalent mitigation identified via a Habitats Regulations Assessment (HRA)) of £321.22 per new dwelling is required in order to mitigate in-combination recreational disturbance impacts on European designated sites as identified through the Local Plan. A list of other requirements that may be necessary for some sites to mitigate their impact are included in Annex 1 of the draft HRA template.
- 1.10 Policy WLP8.3 requires sites over 100 units to provide 5% of plots for self or custom build homes as a minimum. There is significant demand for these types of plots and currently there are in excess of 500 people on East Suffolk's self and custom build register. The Council can offer help in contacting people on the register about self or custom build opportunities. To maximise the benefits from self or custom build homes it is important to consider matters such as their location and any design principles to guide the development from an early stage. To discuss selfbuild further please email planningpolicy@eastsuffolk.gov.uk.

Pre-application advice service

The Council encourages pre-application discussions with planning officers for all applications to ensure the process is as efficient as possible.

Pre-application engagement should be undertaken with key stakeholders, such as Suffolk County Council (highways, flooding etc.), the Environment Agency, Natural England and Historic England.

Contact the Development Management Team to find out about the pre-application advice service and planning application process:

- www.eastsuffolk.gov.uk/pre-applicationadvice-service
- dutyplanner@eastsuffolk.gov.uk

Contact details

For further information or queries regarding the planning policy context for this site, please contact the Planning Policy and Delivery Team:

- planningpolicy@eastsuffolk.gov.uk
- m 01502 523029 or 01394 444557

South west border of site, looking north West

Centre of Southern border of site, looking North

Eastern border of site, looking west



Eastern border of site, looking south

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2 Policy Context

The East Suffolk Council Waveney Local Plan policies directly relevant to this site are:

- WLP2.14 Land North of Union Lane, Oulton
- WLP8.1 Housing Mix
- WLP8.2 Affordable Housing
- WLP8.3 Self Build and Custom Build
- WLP8.21 Sustainable Transport
- WLP8.24 Flood Risk
- WLP8.28 Sustainable Construction
- WLP8.29 Design
- WLP8.30 Design of Open Spaces
- WLP8.31 Lifetime Design
- WLP8.32 Housing Density and Design
- WLP8.34 Biodiversity and Geodiversity
- WLP8.35 Landscape Character
- WLP8.37 Historic Environment
- WLP8.38 Non-Designated Heritage Assets
- WLP8.40 Archaeology

Other context considerations

2.1 Development on the site could fall under Schedule 2 of the EIA Regulations and would need to be screened by the local planning authority to determine whether an Environmental Impact Assessment is required.

Policy WLP2.14 – Land North of Union Lane, Oulton

Land north of Union Lane, Oulton (5.70 hectares) as identified on the Policies Map is allocated for a residential development of approximately 150 dwellings.

The site should be developed in accordance with the following site specific criteria:

- The site will be developed at a density of approximately 30 dwellings per hectare.
- Vehicular access should be off Parkhill. An additional pedestrian and cycle access should be provided on to Union Lane. The pavement on Parkhill should be extended to the site entrance.
- A play space equivalent to a local equipped area for play of approximately 0.4 hectares in size should be provided.
- If needed at the time of the planning application, 0.09 hectares of land on the site should be reserved for a new pre-school setting.
- A full site investigation report assessing the risk of ground contamination should be submitted with any planning application.
- Development should avoid impacts on and enhance the historic burial ground.
- A Transport Assessment and Travel Plan should be submitted with any planning application.
- A completed ecological assessment undertaken by a suitably qualified person will be required as part of any planning application.

If required, land for the pre-school setting will be transferred to the Council in accordance with the payment in kind provisions of Regulation 73 of the Community Infrastructure Regulations 2010 (as amended).

Figure 1: Policy WLP2.14 – should be read in conjunction with supporting text

3 Development Considerations

This section outlines what currently exists on and around the site in terms of the built, natural and historic environments which will need to be considered by any proposal as outlined in the Development Framework (Section 4).

Understanding the place

- 3.1 The site lies on the edge of Oulton, with agricultural fields to the north and west. The land slopes down towards the western edge, then slopes back up beyond site boundary.
- 3.2 Key countryside views are identified across the site towards the north and west.
- 3.3 Residential development bounds the site to the south and east (along the B1375). A care home is located within the residential area to the south.
- 3.4 A number or derelict buildings are located within the western extent of the site.
- 3.5 The immediate built environment comprises a mix of one, two and three storey dwellings of a semi-detached and detached nature. Single storey dwellings can be found adjacent to the site along Airey Close.
- 3.6 Surrounding dwellings generally front onto their associated streets rather than onto the site.
- 3.7 The massing of surrounding buildings is commensurate with their use, with residential dwellings showing a range of masses and densities.

- 3.8 There are limited public open spaces between buildings, the most significant area is situated between the dwellings of Airey Close and the care home.
- 3.9 The foul sewerage network will require improvements to support new development.
- 3.10 Telephone lines are located on the west side of the B1375 close to the boundary of the site.



Figure 2: Development density, building heights and key views

Key views

Building Height

Housing density

Low

Natural and historic environment

- 3.11 The site is located within an area of low landscape capacity, as identified in the Great Yarmouth and Waveney Settlement Fringe Landscape Sensitivity Study (2016).
- 3.12 Workhouse Wood, Parkhill Wood, Flixton Decoy, Flixton Decoy Meadows, Whitehouse Farm Meadow, Blundeston Prison Lake and Woods and Foxborough Wood County Wildlife Sites are all located within 1km of the site.
- 3.13 The Landscape Character Assessment states that small farm woodlands and small-scale intricate field patterns highlight the historic enclosure landscape pattern. The wooded skylines associated to the tributary valleys and woodland blocks are judged sensitive, as are field boundary networks, which provide a sense of enclosure.
- 3.14 There are a number of large freestanding trees located on the site, none of which are protected by Tree Preservation Orders (TPO).
- 3.15 Two Grade II listed buildings are located 15 metres east of the site on the opposite side to the B1375. The buildings and their settings are statutorily protected. The principal elevations of the listed buildings face the site - any proposal must take full account of their setting in terms of potential impacts on significance.

3.16 The site was formerly used as a hospital and a workhouse, with an associated burial site located in the north west corner of the site. There are sewage filter beds in the western part of the site and cropmarks to the north, west and south west.

- 3.17 The Suffolk County Council Historic Environment Record shows World War II defensive ditches run within the allocation area.
- 3.18 There are potential issues with land contamination due to its previous use as Lothingland Hospital. A full site investigation report should be submitted with any planning application which includes reports on intrusive surveys, a risk assessment and remediation method statement.
- 3.19 Shallow groundwater has been encountered nearby which could affect the feasible depth of Sustainable Drainage Systems (SuDS).

Figure 3: Natural and historic features within the site and wider environment



Movement

- 3.20 Footpaths are located close to the south western and northern boundaries of the site, Footpath 6 and Footpath 3 respectively.
- 3.21 There is no footway along Parkhill and adjacent residential roads have unconnected footways.
- 3.22 There is no cycle infrastructure directly connecting to the site.
- 3.23 The nearest bus stops are located approximately 0.3 miles south and 0.5 miles north of the site along Parkhill (B1375).
- 3.24 Oulton Broad North train station is located 1.5 miles to the south.

The following facilities and services are located nearby (as shown in Figure 4):

- Oulton Community Centre including recreation ground (0.2 miles to the south).
- Crestview Medical Centre (0.8 miles to the south east)
- Aldi Grocery Shop (0.6 miles to the east).
- Oulton Post Office (1 mile to the south).
- Woods Loke Primary School (1 mile to the south east)
- The Limes Primary Academy (1 mile to the south west)
- The Benjamin Britten Music Academy (1.1 miles to the east)



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4 Development Framework

This section highlights what will be expected from proposals in response to the development considerations raised in the previous section. The following design principles are displayed in Figure 5 (Development Framework Map).

Creating a built form

- 4.1 Development should create a strong built edge fronting onto both Parkhill and the western boundary, overlooking the proposed cycling and walking routes.
- 4.2 The main access road off Parkhill should be linear, creating an attractive principal route through the development with high quality landscaping. The route should be tree lined and maximise the key view through to the countryside beyond.
- 4.3 Street patterns and building frontages should retain and frame key views on and beyond the site.
- 4.4 Any continuation of development along the western edge should ensure key views are retained and the historic significance of the burial site is preserved.
- 4.5 Development must be appropriately set back from the single storey dwellings along the southern edge of the site, retaining existing vegetation where possible.
- 4.6 All open space should be carefully enclosed and overlooked to provide natural surveillance.
- 4.7 The local equipped area for play should be delivered whilst making the most of key views.
- 4.8 The infrastructure requirements included in this brief, such as the play space and pre-school, should not be considered exhaustive. Further infrastructure requirements may be identified as

necessary to deliver development as the site progresses through the planning process.

Landscape and heritage integration

- 4.9 Existing hedgerows along the boundaries of the site and freestanding trees should be retained and enhanced. Development should be appropriately set back from root protection areas.
- 4.10 Except where needed for access, the hedgerow along Parkhill should be retained as it is important in helping to preserve the settings of the two listed buildings located to the east as well as for its biodiversity value.
- 4.11 A wildlife corridor should be incorporated from the north to the south of the site alongside the existing vegetation.
- 4.12 Native planting should be used to integrate the site with the landscape structure.
- 4.13 Development will be supported where it will retain, restore and enhance the biodiversity of the site. Development should achieve demonstratable net gains for wildlife, habitats and green infrastructure improvements.
- 4.14 A minimum of 12-15% of the site should be reserved for strategic, above ground, open Sustainable Drainage Systems (SuDS) (i.e. not including pervious surfaces) until a more detailed

analysis of surface water drainage requirements is undertaken.

- 4.15 National mapping suggests infiltration may not be feasible in parts of the site. Testing will be required to investigate this further. If infiltration is achieved this must be prioritised at source. Consideration must be given to groundwater levels and the location of the site in a Source Protection Zone. The applicant must engage with SCC to ensure appropriate SuDS are incorporated. Existing watercourses must be integrated into the development layout.
- 4.16 An application must be supported by results of a programme of archaeological evaluation so the history of the site, including the defensive ditches, the burial ground and the workhouse lands are fully understood.
- 4.17 This should include desk-based assessment, heritage asset assessment, visual impact assessment and appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.
- 4.18 Development on the burial ground should be avoided and be designed to preserve and enhance its historic significance and setting. This could include using open space to protect the integrity

Figure 5: Development framework map

of the burial site and measures that assist in the interpretation of the heritage aspects of the site.

Streets and movement

- 4.19 Cycling and walking connections should be made onto Union Lane
- 4.20 Pedestrian and cycle connections should be made between Footpath 3 and Footpath 6 along and beyond the western boundary of the site. The site should be connected to Policy WLP2.15 for walking and cycling via Footpath 6, which should be upgraded to a bridleway.
- 4.1 Cycling and walking infrastructure should be provided along Parkhill, west of the existing hedgerow, linking north into Footpath 9. A footway should be provided along Parkhill, to the crossroads at Union Lane.
- 4.2 Discussions must be held with SCC to determine the appropriate form for the junction from Parkhill
 based on the traffic flows associated with the development and Parkhill as well as consideration of pedestrians and cyclists.





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Consultation Statement

Agenda Item 11 ES/0868

WLP2.14 Land North of Union Lane, Oulton Residential Development Brief Supplementary Planning Document



July 2021

Contents

1. Introduction	3
2. Initial Consultation	3
3. Consultation on Draft Residential Development Brief	5
Appendix 1 – Initial Consultation	7
Appendix 2 – Consultation Bodies	20
Appendix 3 – Site Notice and Twitter Post	21
Appendix 4 – Responses to draft residential development brief for WLP2.14 Land	
Union Lane, Oulton	

1. Introduction

Residential Development Briefs are being produced for a number of allocations within both East Suffolk Local Plans. The residential development briefs highlight the considerations that any development on the relevant site will need to respond to. The briefs outline the Council's aims for each site without being prescriptive, and allow for innovative design. The residential development briefs will be considerations when a planning application is submitted for a site and planning applications will be expected to demonstrate how the principles outlined in the relevant residential development brief have been considered.

The first development brief to be produced is for Land North of Union Lane (Policy WLP2.14 of the East Suffolk – Waveney Local Plan). This Consultation Statement provides a record of all consultation carried out as part of the development of the brief, and has been produced under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

Consultation on the brief has been carried out in two stages:

- Consultation on Residential Development Brief Template took place between 5th June and 24th July 2020.
- Consultation the draft residential development brief for Land North of Union Lane (Policy WLP2.14) took place between 10th May and 21st June 2021.

The statement outlines both the initial consultation on the template and the later consultation on the draft residential development brief for WLP2.14 Land North of Union Lane.

The Council's approach to engagement is set out in the Statement of Community Involvement¹. While preparing the template and the brief, East Suffolk Council consulted with relevant organisations and members of the public. Details of this consultation process are set out below.

2. Initial Consultation

Who was consulted?

The following organisations and groups were consulted during the initial consultation:

¹ <u>Statement of Community Involvement (April 2021)</u>

- Individuals registered on the Local Plan and Related Documents Mailing List.
- Individuals and organisations registered on the Developers Forum Mailing List.
- Registered Landowners and Agents for allocated sites in the East Suffolk Council Waveney Local Plan and East Suffolk Council – Suffolk Coastal Local Plan.
- Members of the public

How were they contacted?

A seven-week consultation on the residential development briefs template took place between 5th June and 24th July 2020. The consultation was advertised using targeted emails and social media posts. Those on the Council's Local Plan and Related Documents Mailing List and the Developers Forum were contacted directly by email or letter.

Comments could be made on the document directly through the Council's website. Comments were also accepted via email and letter.

To focus the responses, the consultation asked the following questions:

- 1) Do you think residential development briefs will help facilitate high quality design?
 - a. If yes, why do you think this?
 - b. If no, why do you think this and what other design governance tool/s do you think would be more useful?
- 2) Do you think the draft residential development brief template provides the scope and detail needed to guide Pre-Application discussions and planning applications on allocated sites?
- 3) Are there any additional considerations that the draft residential development brief template could include?
- 4) Do you think the draft residential development brief template is easy to use and understand?
- 5) Do you think the balance between written and visual information is appropriate?
- 6) How do you think the document presentation could be improved?
- 7) Do you have views on when and how landowners and agents should be involved in the drafting process?

The consultation documents were made available on the East Suffolk Council website via the pages below:

<u>Residential Development Briefs Draft Template - East Suffolk Council, Strategic Planning</u> <u>Consultations (inconsult.uk)</u>

Due to the social distancing restrictions and the national lockdown as the result of the Covid-19 pandemic, libraries and other public spaces were not accessible during the consultation period. Therefore, paper copies of documents could not be made available at these locations. Physical copies of documents were, however, sent out on request. In total 15 individuals and organisations responded to the consultation. Between them they made 55 comments.

A summary of the comments received, and the Council's response to those comments are set out in Appendix 1 of this statement. Full copies of the responses have been published on the Council's website at:

<u>Responses to the Consultation - Residential Development Briefs Draft Template - East</u> <u>Suffolk Council, Strategic Planning Consultations (inconsult.uk)</u>

3. Consultation on Draft Residential Development Brief

Who was consulted?

The following organisations and groups were consulted during the consultation:

- Internal colleagues and teams, including Development Management.
- Individuals registered on the Local Plan and Related Documents Mailing List.
- The landowner of the site
- Oulton Parish Council
- Suffolk County Council
- Members of the public

How were they contacted?

During the preparation of the draft residential development brief for WLP2.14 Land North of Union Lane, the Council engaged with the landowner (including their agents), Suffolk County Council and Oulton Parish Council. Each provided comments that were incorporated into the residential development brief where appropriate. During the preparation of the residential development brief a wide range of service areas were also involved, including Planning Policy, Development Management, Major Sites and Infrastructure, Design and Conservation, Landscape, and Ecology.

A six-week consultation on the draft residential development brief took place between 10th May and 23rd June 2021. The consultation was initially scheduled to end on the 21st June. However, a technical issue on the 21st June meant that comments could not be submitted on that day, therefore the consultation was extended to the 23rd June to mitigate this.

The consultation was advertised using site notices, social media posts and a press release. Those on the Council's Local Plan and Related Documents Mailing List were contacted directly by email or letter. Individual emails were also sent to the landowner (and their agents) and Oulton Parish Council. The residential development brief was presented primarily through the use of ArcGIS Storymap. The Storymap was made available through the link below:

Land north of Union Lane, Oulton (arcgis.com)

Comments could be made on each section of the residential development brief through links that took participants to Inovem questionnaires. Participants were able to use tickboxes to highlight which paragraphs or maps their comments related to, or if their comments were general.

Comments were also accepted via email and letter.

The draft residential development brief was also available to view as a PDF. The supporting documents (Initial Consultation Statement, Habitats Regulations Assessment Screening Opinion, Strategic Environmental Assessment Screening Opinion and Equality Impact Assessment Screening Opinion) were also available as PDF documents.

A summary of the comments received, and the Council's response, are set out in Appendix 4 of this statement.

Due to the social distancing restrictions and the national lockdown as the result of the Covid-19 pandemic, libraries and other public spaces were not accessible during the consultation period. Therefore, paper copies of documents could not be made available at these locations. Physical copies of documents were, however, sent out on request.

In total 67 individuals and organisations responded to the consultation. Between them they made 114 comments.

Full copies of the responses have been published on the Council's website at

<u>Responses to The Consultation - WLP2.14 Draft Residential Development Brief - East Suffolk</u> <u>Council, Strategic Planning Consultations (inconsult.uk)</u>

Appendix 1 – Initial Consultation

The table below lists the main issues raised in the consultation responses, the Council's response and how they informed the preparation of the document.

Respondent	Key Issues/Comments	East Suffolk Council Response	Action
Suffolk County	Footpaths is a legally defined term.	Agreed.	Changes made.
Council Public	Under Movement of Development		
Rights of Way	Considerations change 'footpaths' to		
	'footways' and 'Rights of Way' to		
	'public access to the site'.		
Suffolk County	Under Creating a Built Form replace	Agreed.	Change made.
Council Public	'footpaths' with 'public rights of way'		
Rights of Way			
Suffolk County	Under Streets and Movement change	Agreed.	Change made.
Council Public	'footpaths' to 'public access'.		
Rights of Way			
Suffolk County	On the Development Framework Map	Agreed.	Change made.
Council Public	change 'footpaths' to 'footways and		
Rights of Way	public rights of way'.		
Suffolk County	The Template provides specific	Comments noted.	None.
Council Public	direction for sites and provides		
Rights of Way	sufficient scope and detail for pre-		
	application discussions.		
Suffolk County	The Template could go further to	Agreed.	The Movement and Streets and
Council Public	prioritise car-free and accessible		Movement sections will be
Rights of Way	journeys to services and facilities,		rearranged to detail sustainable
	community and accessing the wider		transport options before car access to
	countryside.		show that these have a higher

			priority. This sentiment is also highlighted in Local Plan policies.
Suffolk County Council Public Rights of Way	Illustrate best practice with real examples and local case studies to illustrate objectives and aims.	Comments noted. Examples will be considered on a case by case basis and used where they can clearly show the aims and ambitions that the Council has for a site.	None.
Environment Agency	Under Natural and Historic Environment section there needs to be clear guidance on where a flood risk assessment is needed.	Comments noted. Local Plan policies identify when a flood risk assessment will be needed for a site. This will be reflected in the Residential Development Briefs.	None.
Environment Agency	Under Natural and Historic Environment land contamination should also be identified.	Agreed.	Land contamination has been added to the Natural and Historic Environment section.
Environment Agency	Green corridors should be listed in the Streets and Movement section as well as the Landscape Integration section of the Development Framework.	Agreed.	The Streets and Movement section now refers to considering how green corridors could be integrated into the pedestrian network.
Environment Agency	The Landscape Integration section should also promote Biodiversity Net Gain.	Agreed.	Reference to the need to provide Biodiversity Net Gain has been added to the Landscape Integration section and will be considered as appropriate to the scale of the individual sites.
Wellington Ltd.	The document helps provide detailed requirements and opportunities for positive decision making.	Comments noted.	None.
Wellington Ltd.	Key considerations should include site contamination and drainage. Input	Comments noted and agreed.	Land contamination and drainage has been added to the Natural and Historic Environment section.

	from other departments would be helpful.		Contacts have been established with key stakeholders who can provide information on these issues for specific sites.
Nigel Doyle	There are alternative methods that would secure better places on allocated sites, such as Garden City Principles, Enquiry by Design, Parameter Plans and some of the suggestions from the Building Beautiful Places Report.	The Council will reflect the best practice available when creating the Residential Development Briefs. Where relevant, other studies and information will be included within the Briefs to ensure that the best and most up-to-date information is included and considered throughout the planning application process.	None.
Nigel Doyle	The Template would allow for past mistakes to be repeated, does not allow for community engagement and could allow mediocre schemes to be approved or innovative schemes to be dismissed.	The Residential Development Briefs Draft Template has been created to provide clarity on sites to ensure the best possible development whilst also not being prescriptive to allow for innovative design. Support for innovative design has also been included in Local Plan policies which planning applications will still be subject to. The Residential Development Briefs for individual sites will also be subject to public consultation before adoption.	None.
Nigel Doyle	Not clear how the document will promote Building for Life 12, sustainable construction, digital infrastructure and allotments.	These elements are covered by Local Plan policies which any planning application will be subject to. The Residential Development Briefs will help	None.

		show how these policy requirements can be delivered on specific sites.	
Nigel Doyle	No mention of Biodiversity Net Gain and biodiversity should be considered under following headings: distinctiveness, condition, strategic significance and habitat connectivity.	Comments noted and agreed.	Reference to the need to provide Biodiversity Net Gain has been added to the Landscape Integration section and will be considered as appropriate to the scale of the individual sites.
Nigel Doyle	The Template does not have any requirements for renewable energy, sustainable urban drainage systems and grey water harvesting, a clear definition of public and open spaces, a diversity of housing types and tenures, any long term management, communal recycling facilities and facilities for delivery drivers.	These elements are covered by Local Plan policies which any planning application will be subject to. The Residential Development Briefs will help show how these policy requirements can be delivered on specific sites.	None.
Historic England	Not clear how the Residential Development Briefs will fit into the development process. Need to be clear on who will commission the Briefs, the stakeholders who will be involved, the timescales involved, the extent of consultation and the adoption process. A paragraph outlining these issues is recommended.	Comments noted. The Council will lead the creation of the Residential Development Briefs and will involve key stakeholders dependent on the issues related to each site. The timescales for each Brief will be dependent on a number of factors and cannot be confirmed. Each Brief will be subject to the same period of consultation and adoption process of other Supplementary Planning Documents. A paragraph outlining this process is not considered to be necessary.	None. The process that will occur following the public consultation on site specific Residential Development Briefs will be clearly outlined during the public consultation stage.

Historic	Natural Environment and Historic	Natural and Historic Environment	None.
England	Environment could have their own	features will be given their own maps	
	sections.	and pages if there is sufficient	
		information to require it.	
Historic	The Residential Development Briefs	The Outline stage does provide an	The paragraph referring to Outline
England	state that they replace the need for	opportunity for key studies to be	applications has been reworded to
	an Outline application. This is the	completed, however these can also be	state that the Residential
	stage where some key technical	completed at later stages. Also, the	Development Briefs can allow
	evidence is produced, such as	Residential Development Briefs will	applications for the relevant site to
	archaeological surveys. Without this	provide a high level indicative plan that	proceed straight to Full application.
	stage it is not clear when these will be	will be adaptable and allow for different	
	produced. This evidence should	and innovative designs, meaning it will	
	precede the creation of the Briefs, or	also be able to accommodate any issues	
	at an early stage as possible.	that arise throughout the application	
		process.	
Historic	The Briefs should contain the most	Agreed. The Council will always use the	None.
England	up-to-date evidence, including	most up-to-date evidence available.	
	Historic Environment Records.		
Broads	Overall, as very positive approach and	Comments noted.	None.
Authority	should ensure sound urban design		
	principles are adopted for each site,		
	with local context being well		
	considered.		
Broads	Where relevant, there needs to be	Agreed.	Reference to the impact on the
Authority	consideration of the impact on the		Broads and the referenced studies has
	Broads and their setting. For sites		been included in the Natural and
	near to the Broads, there should be		Historic Environment section and will
	consideration of the Broads		be included where relevant.
	Landscape Character Appraisal, Water		
	Quality Risk Maps and SSSI Risk Maps.		

Broads	Development Framework Map could	Comments noted. The Development	None.
Authority	be considered as a preferred design	Framework Map will highlight key	
	approach, rather than an indicative	considerations, however it will be made	
	design showing key considerations,	clear that this is only indicative.	
	but this can be overcome.		
Tuddenham St	The Residential Development Briefs	These elements are covered by Local	None.
Martin Parish	should require provision for adequate	Plan policies which any planning	
Council	parking and service vehicle access,	application will be subject to. The	
	access to catchment school, reducing	Residential Development Briefs will help	
	social isolation and loneliness,	show how these policy requirements can	
	environmental care and sustainable	be delivered on specific sites.	
	transport, helping people age well		
	and traffic and road safety.		
Grundisburgh	There are alternative methods that	The Council will reflect the best practice	None.
and Culpho	would secure better places on	available when creating the Residential	
Parish Council	allocated sites, such as Garden City	Development Briefs. Where relevant,	
	Principles, Enquiry by Design,	other studies and information will be	
	Parameter Plans and some of the	included within the Briefs to ensure that	
	suggestions from the Building	the best and most up-to-date	
	Beautiful Places Report.	information is included and considered	
		throughout the planning application	
		process.	
Grundisburgh	The Template would allow for past	The Residential Development Briefs Draft	None.
and Culpho	mistakes to be repeated, does not	Template has been created to provide	
Parish Council	allow for community engagement and	clarity on sites to ensure the best	
	could allow mediocre schemes to be	possible development whilst also not	
	approved or innovative schemes to be	being prescriptive to allow for innovative	
	dismissed.	design. Support for innovative design has	
		also been included in Local Plan policies	
		which planning applications will still be	

		subject to. The Residential Development Briefs for individual sites will also be subject to public consultation before adoption.	
Grundisburgh and Culpho Parish Council	Not clear how the document will promote Building for Life 12, sustainable construction, digital infrastructure and allotments.	These elements are covered by Local Plan policies which any planning application will be subject to. The Residential Development Briefs will help show how these policy requirements can be delivered on specific sites.	None.
Grundisburgh and Culpho Parish Council	No mention of Biodiversity Net Gain and biodiversity should be considered under following headings: distinctiveness, condition, strategic significance and habitat connectivity.	Comments noted and agreed.	Reference to the need to provide Biodiversity Net Gain has been added to the Landscape Integration section and will be considered as appropriate to the scale of the individual sites.
Grundisburgh and Culpho Parish Council	The Template does not have any requirements for renewable energy, sustainable urban drainage systems and grey water harvesting, a clear definition of public and open spaces, a diversity of housing types and tenures, any long term management, communal recycling facilities and facilities for delivery drivers.	These issues are either already covered by Local Plan policies or are additional requirements that would not be appropriate for inclusion within the Residential Development Briefs.	None.
Suffolk Wildlife Trust	Under Natural and Historic Environment section should include requirement for consideration of key ecological networks.	Comments noted. The Council does not have sufficient data on ecological networks across the District at present to include this as a consideration. Site specific information will be included from studies where relevant. If	None.

Suffolk Wildlife Trust	Landscape Integration should include a requirement for measurable	information on ecological networks does become available during the creation of the Residential Development Briefs this will be included. Comments noted and agreed.	Reference to the need to provide Biodiversity Net Gain has been added
	Biodiversity Net Gain.		to the Landscape Integration section and will be considered as appropriate to the scale of the individual sites.
Westerfield Parish Council	Local Parish Councils should have the opportunity to contribute from an early stage.	Parish and Town Councils will have the opportunity to contribute to the Residential Development Briefs along with the local community.	None.
Suffolk County Council	Concern over the removal of the need for an Outline application due to this stage being associated with specific site evaluations. Need to identify what site assessments are needed as these could have knock-on effects on the layout.	The Outline stage does provide an opportunity for key studies to be completed, however these can also be completed at later stages. Also, the Residential Development Briefs will provide a high level indicative plan that will be adaptable and allow for different and innovative designs, meaning it will also be able to accommodate any issues that arise throughout the application process.	The paragraph referring to Outline applications has been reworded to state that the Residential Development Briefs can allow applications for the relevant site to proceed straight to Full application.
Suffolk County Council	There is no reference to climate change. There are a number of relevant considerations including water stress, coastal management, reducing carbon emissions etc.	Issues relating to climate change have been addressed in Local Plan policies which any planning application will still be subject to. Where relevant, site specific issues related to climate change will be referenced.	None.

	It would be weekel for the Deside state	The Decidential Development Driver 11	Considerations that could improve
Suffolk County Council	It would be useful for the Residential	The Residential Development Briefs will make reference to relevant Local Plan	Considerations that could improve
Council	Development Briefs to reference how		public health, such as promoting
	development could enhance public	policies and highlight when these should	walking and cycling, have been
	health and provided basic information	be considered. Other public health	reorganised to be placed above other
	on the health and wellbeing of	benefits such as green infrastructure will	considerations. Other features such as
	existing communities. Many of the	also be considered through the creation	green infrastructure will also be
	topics are addressed in Local Plan	of the residential Development Briefs.	considered for their public health
	policies and these should be reflected.	Contacts have also been established with	benefits.
		the Suffolk County Council Public Health	
		department who will be able to	
		comment on individual sites.	
Suffolk County	Welcome reference to Historic	Comments noted.	None.
Council	Environment Records and		
	archaeological potential.		
Suffolk County	There needs to be a more holistic	Comments noted. Features such as	None.
Council	consideration of water, not just	ditches will be identified at the site visit	
	flooding. Watercourses and ditches	stage of creating the Residential	
	could be mapped and flooding from	Development Briefs. They will also be	
	all sources should be highlighted.	identified on relevant maps within the	
	Ensuring space for water should be	Briefs. Contacts have been established	
	given greater emphasis in the	with key stakeholders who will be able to	
	Development Framework section.	comment on drainage and other water	
	Suffolk County Council supports	issues to ensure these are fully	
	multifunctional SuDS but their long-	integrated into the Briefs.	
	term maintenance needs to be		
	considered.		
Suffolk County	Priority should be given to sustainable	Agreed. Local Plan policies also highlight	The Movement and Streets and
Council	transport modes.	the importance of these modes and will	Movement sections will be
		be referenced within the Residential	rearranged to detail sustainable
		Development Briefs.	transport options before car access to
	I		

			show that these have a higher priority. This sentiment is also highlighted in Local Plan policies.
Suffolk County Council	It should be highlighted when a site is within the Minerals Consultation Area or within 250m of a facility safeguarded by the Suffolk Minerals and Waste Local Plan.	Agreed.	These considerations have been added to the Natural and Historic Environment section.
Suffolk County Council	Natural and Historic Environment section could be separated.	Natural and Historic Environment features will be given their own maps and pages if there is sufficient information to require it.	None.
Suffolk County Council	Suffolk County Council and other statutory consultees should be involved form an early stage.	Agreed. Suffolk County Council and other stakeholders will be involved during the creation of the Residential Development Briefs where this is considered necessary.	None.
Persimmon	The Residential Development Briefs are a way of providing certainty and are easy to use. They will inform the approach to layouts and highlight the Councils ambitions.	Comments noted.	None.
Persimmon	Who will be responsible for creating the brief? What are the timescales? How will sites be prioritised? Is there a particular view on contemporary design?	The Council will lead the creation of the Residential Development Briefs and will involve key stakeholders dependent on the issues related to each site. The timescales and priority of each Brief will be dependent on a number of factors and cannot be confirmed at this time. Each Brief will be subject to the same	None.

		1	
		period of consultation and adoption	
		process of other Supplementary Planning	
		Documents. The design of schemes will	
		be considered on a case by case basis,	
		however the Residential Development	
		Briefs have been designed to ensure	
		innovative design is not inhibited.	
Persimmon	What would the Councils position be	The Residential Development Briefs are	None.
	if an application was submitted?	intended to help focus the pre-	
		application process. The Council will	
		encourage landowners, agents and	
		developers to work with us to develop	
		Briefs for sites in order to provide	
		certainty and clarity in the planning	
		application process.	
Persimmon	Landowners should be involved early	Landowners and agents will be involved	None.
	in the process. Expectations should be	during the drafting of the Residential	
	realistic, and the Residential	Development Briefs. The Briefs have	
	Development Briefs should not be	been designed to ensure that they are	
	prescriptive.	not prescriptive and still allow for	
		innovative and good design.	
Pigeon	Will Residential Development Briefs	Some sites allocated in the Local Plans	None.
Investment	be required for sites that require	are at a scale where they will require	
Management	masterplans to be developed?	masterplans to be agreed before an	
		application can be approved. This is	
		stated in the relevant Local Plan policies.	
		Residential Development Briefs will not	
		be created for these sites due to the	
		requirement for a masterplan.	

Pigeon Investment Management	Will Residential Development Briefs be created for sites where planning applications are being submitted at the time?	The Residential Development Briefs are intended to help focus the pre- application process. If a planning application has advanced before a Brief can be created, the creation of a Brief would likely slow down the planning process. A Brief would therefore not be created.	None.
Pigeon Investment Management	Residential Development Briefs should not be created for sites of more than 200 dwellings.	The Council will consider the need for Residential Development Briefs on a site by site basis. There will be no strict threshold on the size of the sites that will be considered, however any site that specifies a masterplan is required for a planning application within the Local Plan will not have a Brief created for them.	None.
Pigeon Investment Management	A full list of sites and timetables should be released.	The priority given to sites to create a Residential Development Brief is dependent on a number of factors and is likely to change over time. A full list of sites will not be released in order to provide flexibility and allow the Council to respond to the circumstances at the time. However landowners, developers and agents will be contacted at the beginning of the creation process for Briefs associated with their sites so they can be involved in the creation process.	None.

Ipswich and East Suffolk CCG	Sites of more than 250 dwellings should be supported by a Health Impact Assessment.	Comments noted.	None.
Ipswich and East Suffolk CCG	The Council should consult with key stakeholders and infrastructure providers form an early stage.	The Council will consult with key stakeholder relevant to the location and scale of the site as early as possible during the drafting process.	None.
Peasenhall Parish Council	Approve of the creation of Residential Development Briefs and encourage participation by the community during their development.	The local community will have the opportunity to contribute to the Residential Development Briefs through public consultation.	None.
Peasenhall Parish Council	Recommends the inclusion of a carbon neutral policy.	Issues relating to climate change have been addressed in Local Plan policies which any planning application will still be subject to. Where relevant, site specific issues related to climate change will be referenced.	None.

Appendix 2 – Consultation Bodies

Specific consultation bodies
specific consultation sources

Specific consultation bodies
The Coal Authority
Environment Agency
Historic England
Marine Management Organisation
Natural England
Network Rail
Highways Agency
Suffolk County Council
Parish and Town Councils within and adjoining the East Suffolk District
Suffolk Constabulary
Adjoining local planning authorities – Ipswich Borough Council, Babergh District Council,
Mid Suffolk District Council, South Norfolk District Council, Great Yarmouth Borough
Council and the Broads Authority
NHS England and the Care Commissioning Groups
Anglian Water
Essex and Suffolk Water
Homes England
Electronic communication companies who own or control apparatus in the District
Relevant gas and electricity companies
General consultation bodies
Voluntary bodies some or all of whose activities benefit any part of the District
Bodies which represent the interests of different racial, ethnic or national groups in the
District
Bodies which represent the interests of different religious groups in the District
Bodies which represent the interests of disabled persons in the District
Bodies which represent the interests of persons carrying on business in the District
Other individuals and organisations
Includes local businesses, high schools, individuals, local organisations and groups,
planning agents, developers, landowners, residents and others on the Local Plan mailing list.

Appendix 3 – Site Notice and Twitter Post



What are we doing?

Land north of Union Lane, Oulton (WLP2.14) was allocated for approximately 150 homes in the Waveney Local Plan in 2019. East Suffolk Council is now preparing a residential development brief for the site to create a <u>high quality</u> development. This is not a planning <u>application</u>, but will help guide development on the site before any planning application is submitted.

Find out more and give your views: www.eastsuffolk.gov.uk/ planning-policy-consultations

Alternatively, please send your comments to: East Suffolk Council, Planning Policy & Delivery Team, Riverside, 4 Canning Road, Lowestoft, Suffolk NR33 0EQ

How can you get involved?



HIGHLIGHT ISSUES

What issues should be considered when setting out the site layout?



SUGGEST SOLUTIONS

What design solutions would you suggest <u>to address</u> any issues on the site?



INTERACTIVE DOCUMENT

View the draft residential development brief online and give your views.

planningpolicy@eastsuffolk.gov.uk
 01394 444557 / 01502 523029

Tweet

1 East Suffolk Council Planning Retweeted



East Suffolk Council 🤣 @EastSuffolk

Have your say! Residential development briefs are being prepared for a number of sites allocated in the East Suffolk Local Plans. The first of these is for WLP2.14 (Land north of Union Lane, Oulton) - a 6 week public consultation begins today:

eastsuffolk.gov.uk/news/have-your...



11:23 AM · May 10, 2021 · Twitter Web App

3 Retweets 4 Likes



17



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Appendix 4 – Responses to draft residential development brief for WLP2.14 Land North of Union Lane, Oulton

Name/ Organisation	Section of Development Brief	Type of response	Comment Summary	Council Response	Action
Peter Cannings	Introduction – paragraph 1.7	Observation	Agree with scheme in principle however concerns over increased traffic. Already severe congestion on Beccles Road/Bridge Road especially at peak times. Bridge Road/ Normanston Drive/Gorleston Road junction severely under threat as well. Current additional crossing will have little impact on traffic from Beccles Road direction. 150 new homes will add roughly 300 vehicles. Need a western relief road to alleviate congestion.	The Waveney Local Plan is supported by traffic modelling which evaluated the impact on the growth proposed in the Local Plan, including this site, on the highway network. No issues were found that could not be mitigated against that would mean development could not place on this site. The Council have also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and have provided comments on the highway network which have been incorporated into the brief. Once a detailed proposal has been created for this site there will be further consideration of any necessary highways measures that will be needed to make the access to the site safe.	None.

Scott Miles	Introduction –	Observation	Confused about amount of	The consultation for the residential	None.
	general		publicity as I live on the edge of the	development brief followed the	
	comment		site and on the planning list but	processes outlined in the East	
			have not received an email or	Suffolk Statement of Community	
			letter.	Involvement as closely as possible	
				without breaking the national	
				restrictions put in place due to the	
				Covid-19 pandemic. This included	
				sending emails to everyone listed	
				on the Local Plan and related	
				documents mailing list and	
				publicising on social media. If you	
				did not receive an email or letter, it	
				is recommended that you check	
				that your details are up to date on	
				our system by emailing	
				planningpolicy@eastsuffolk.gov.uk.	
Norman	Introduction –	Objection	Do not agree with any of this as	The Council has worked in	None.
Castleton	paragraphs 1.1		150 homes cannot be supported by	collaboration with infrastructure	
	- 1.10		services in the area, such as health	and service providers during the	
			services, employment, green	creation of the Waveney Local Plan	
			energy, water or environment.	which includes the site WLP2.14	
				Land North of Union Lane, as well	
				as during the creation of the	
				residential development brief. The	
				Council also maintains regular	
				contact with infrastructure	
				providers to ensure that new	
				development is supported by the	
				infrastructure that it requires Any	

				needs highlighted by these providers for them to be able to provide the necessary services have been incorporated into the Local Plan and the Residential Development Brief.	
Mark Harwood	Introduction	Objection	Shocked and saddened that it is considered acceptable to ruin this area. Will have direct impact on lives. Can't even empty bins but want to build more houses. Didn't work all my life to buy a house and have building site next door.	The principle of development on this site was established through the creation of the Local Plan, which is supported by an extensive evidence base and was subject to multiple periods of public consultation, as well as a public examination.	None.
Brian Sutton	Introduction – general comment	Observation	I am very worried about main road access to the B1375. With 130 houses there will be a lot of traffic.	The Waveney Local Plan is supported by traffic modelling which evaluated the impact on the growth proposed in the Local Plan, including this site, on the highway network. No issues were found that could not be mitigated against that would mean development could not place on this site. The Council have also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief, and their comments have been incorporated into the brief. Once a	None.

				detailed proposal has been created for this site there will be further consideration of any necessary highways measures that will be needed to make the access to the site safe.	
Norman Castleton	Introduction paragraphs 1.1 – 1.10	Observation	What about environmental assessment, health provision assessment, clean air scheme, wildlife preservation, green energy assessment, water provision scheme and discouragement of private cars with added public transport. Specific greening criteria for tree planting of 2000 trees minimum, as well as houses for local people and no landlords.	As stated in policy WLP2.14, any planning application will need to be supported by a contamination assessment, ecological assessment, transport assessment and travel plan. Any planning application will also need to provide relevant supporting documents as outlined in the East Suffolk Local Validation List. Any planning application will also need to meet the criteria of the planning policies listed on page 5, which includes policies covering housing mix and tenure, biodiversity and sustainable construction.	None.

Carol Wyatt	Introduction –	Objection	Village has already been built up in	The Council worked in	None.
	general		recent years and this would put	collaboration with infrastructure	
	comment		horrendous pressure on existing	and service providers during the	
			services including doctors, sewers	creation of the Waveney Local Plan	
			and roads. Oulton Road North is	to establish any infrastructure	
			used as a rat run and the B1375 is	needs that would be required to	
			already dangerous. Site will	support the site. The Council also	
			destroy even more wildlife and	maintains regular contact with	
			habitats which has to stop. What	infrastructure providers, including	
			about the old burial ground? We	during the creation of the	
			have to live with decisions and	residential development brief, to	
			should not be about the money.	ensure that new development is	
				supported by the infrastructure	
				that it requires. Any needs	
				highlighted by these providers for	
				them to be able to provide the	
				necessary services have been	
				incorporated into the residential	
				development brief, which includes	
				the potential need for a pre-school.	
				The local Clinical Commissioning	
				Group, as the local healthcare	
				provider, at the time of drafting	
				the brief did not identify any	
				infrastructure needs to support	
				development on this site.	
				The Council has also worked in	
				collaboration with Suffolk County	
				Council as the local highways'	
authority in the creation of this					

residential development brief, who					
have provided comments on the					
highway network which have been					
incorporated into the brief. Once a					
detailed proposal has been created					
for this site there will be further					
consideration of any necessary					
highways measures that will be					
needed to make the access to the					
site safe.					
The historic burial ground has been					
carefully considered and Policy					
WLP2.14 requires that any future					
development should avoid impacts					
on it. The residential development					
brief also highlights that proposals					
to enhance this area should be					
considered an incorporated into					
any future proposals.					
The development framework					
within the residential development					
brief highlights a number of					
considerations that will protect					
wildlife and habitats and integrate					
them into the development, such					
as retaining existing trees and					
hedgerows and the incorporation					

				of a green corridor. As stated in Policy WLP2.14 any planning application for this site will need to be supported by an ecological assessment to determine the existing ecological value of the site. Also, as stated on page 5, any planning application will need to meet the criteria set out in policy WLP8.34 Biodiversity and Geodiversity.	
Karan Anderton	Introduction	Observation	Concerns for residents of Oulton Road North. During construction and after road will be used as a rat run. Already dangerous due to residents using it to turn, with a new gate being put up to stop this. Always cars parked along the road which could be dangerous especially for children.	The Waveney Local Plan is supported by traffic modelling which evaluated the impact on the growth proposed in the Local Plan, including this site, on the highway network. No issues were found that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and have provided comments on the highway network which have been incorporated into the brief. Once a detailed proposal has been created for this site there will be further	None.

				consideration of any necessary highways measures that will be needed to make the access to the site safe. Conditions relating to the safe construction of the site will be established at the planning application stage.	
lan Vince	Introduction – general comment and paragraphs 1.1 – 1.10	Observation	Introduction is basic and site was not identified on land registry search in 2020 when buying home. Will need to consider removal of remains at burial ground, flood risk issues already present since Parkhill was built, CO2, light, noise and pollution impacts, revenue to Council and expenditure taken form proposal, wildlife impacts and tree preservation, financial study and impact on homes close to borders. Covid has been used as a blanket to get some developments approved.	The site is allocated as part of the East Suffolk Waveney local Plan, which was adopted in 2019 and subject to several rounds of public consultation and a public examination. As stated in Policy WLP2.14, any planning application will need to be supported by a contamination assessment, ecological assessment, transport assessment and travel plan, as well as all relevant supporting documents as outlined in the East Suffolk Local Validation List. Any planning application will also need to meet the criteria of the planning policies listed on page 5, which includes policies covering housing mix and tenure,	None.

				biodiversity and sustainable	
				construction.	
				The historic burial ground has been	
				carefully considered and Policy	
				WLP2.14 requires that any future	
				development should avoid impacts	
				on it. The residential development	
				brief also highlights that proposals	
				to enhance this area should be	
				considered an incorporated into	
				any future proposals.	
				The impact on the value of existing	
				properties is not a material	
				consideration as defined by	
				national law when considering a	
				planning application.	
Jill Appleton	Introduction –	Objection	Proposed development would	The Waveney Local Plan is	
	general		increase traffic on B1375, which	supported by traffic modelling	
	comment		has many old buildings and no	which evaluated the impact on the	
			infrastructure to assist with	growth proposed in the Local Plan,	
			increase in traffic. New	including this site, on the highway	
			development would spoil the	network, including the B1375. No	
			village. Surprised to see Parish	issues were found that could not	
			Councils of Peasenhall,	be mitigated against. Suffolk	
			Grundisburgh and Westerfield	County Council as the local	
			have been included in consultation,	highways' authority have provided	
			but no one has contacted Oulton	comments on the highway network	
			Parish Council.	which have been incorporated into	

the brief. Once a detailed proposal
has been created for this site there
will be further consideration of any
necessary highways measures that
will be needed to make the access
to the site safe.
The principle of development on
The principle of development on
this site was established through
the creation of the Local Plan,
which is supported by an extensive
evidence base and was subject to
multiple periods of public
consultation, as well as a public
examination.
The comments and responses,
including those of the various
Parish Councils, included in the
Initial Consultation Statement were
responses that were received
during the consultation on the
draft template for the residential
development briefs which took
place in spring 2020. The
comments do not relate to the
residential development brief for
WLP2.14.

Joyce Hicks	Introduction –	Objection	Concerned with increase in traffic	Traffic modelling identified no	None.
	general		and strain on local services. On	issues that could not be mitigated	
	comment and		Somerleyton Road traffic has	against that would mean	
	paragraphs 1.1		increased significantly since moved	development could not place on	
	- 1.10		there, already have to wait for	this site. The Council has also	
			considerable amount of time to	worked in collaboration with	
			back car out of drive. Since	Suffolk County Council as the local	
			supermarket has been built traffic	highways' authority in the creation	
			has got worse, even though told	of this residential development	
			this would not be the case.	brief and have provided comments	
			Articulated lorries tend to use this	on the highway network which	
			road as well. 150 homes will only	have been incorporated into the	
			make this worse.	brief. The Council worked in	
				collaboration with infrastructure	
				and service providers during the	
				creation of the Waveney Local Plan	
				to establish any infrastructure	
				needs that would be required to	
				support the site. The Council also	
				maintains regular contact with	
				infrastructure providers, including	
				during the creation of the	
				residential development brief, to	
				ensure that new development is	
				supported by the infrastructure	
				that it requires. Any needs	
				highlighted by these providers for	
				them to be able to provide the	
				necessary services have been	

				incorporated into the residential development brief.	
Karma McLean	Introduction – paragraph 1.7	Observation	This section refers to a contamination assessment, ecological assessment, transport assessment and travel plan being included in any application. I would like to check that the assessments will include thorough checks for agricultural waste and contamination relating to the old hospital and burial ground. Knotweed also present 8 years ago which needs to be removed. Diseases affecting some trees coincidently in centre of site, is it necessary to remove them? Once a stream which ran in parallel to houses off Union Lane which back into site and calls to unblock a drain which has caused subsidence for some dwellings (attachments). Closest bus stop is on Somerleyton Road which has thin, unsafe pathways, as does Union Lane leading to The Blue Boar. Speeding	The East Suffolk Local Validation List includes criteria for the various assessments that will be required to support any planning application. Paragraph 4.9 of the residential development brief states that freestanding trees should be retained and enhanced. Paragraphs 4.14 and 4.15 outline requirements regarding drainage including additional investigations that are needed to fully establish what would be appropriate for the site. These requirements have been drafted in collaboration with Suffolk County Council as the lead local flood authority. Traffic modelling identified no issues that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the	None.

			is common and pedestrian crossing is not safe.	creation of this residential development brief and have provided comments on the highway network which have been incorporated into the brief.	
Jamie Illingsworth	Introduction – general comment	Support	All for properties being built due to national housing shortage. Hopefully there is a local builder employing local contractors so whole area can benefit. I hope there will be some affordable housing to help young families in the area get on the housing ladder. I do believe this would benefit all in the Oulton Village area.	Comments noted. Any future planning applications will need to meet the requirements of policy WLP8.2 Affordable Housing as stated on page 5 of the residential development brief.	None.
Lowestoft Town Council (Sarah Foote)	Introduction – general comment	Observation	Concerns over adequate infrastructure (health centres, GPs, Schools) being provided and the current shortages experienced in Lowestoft are not exacerbated. Former cemetery is protected, should be a condition. Town Council have declared a climate emergency and would ask measures are taken to mitigate environmental and wildlife impacts, and sustainable construction material and methods used.	The Council worked in collaboration with infrastructure and service providers during the creation of the Waveney Local Plan to establish any infrastructure needs that would be required to support the site. The Council also maintains regular contact with infrastructure providers, including during the creation of the residential development brief, to ensure that new development is supported by the infrastructure that it requires. Any needs	None.

highlighted by these providers for
them to be able to provide the
necessary services have been
incorporated into the residential
development brief, which includes
the potential need for a pre-school.
The local Clinical Commissioning
Group, as the local healthcare
provider, at the time of drafting
the brief did not identify any
infrastructure needs to support
development on this site. The
historic burial ground has been
carefully considered and Policy
WLP2.14 requires that any future
development should avoid impacts
on it. The residential development
brief also highlights that proposals
to enhance this area should be
considered an incorporated into
any future proposals. The
development framework within the
residential development brief
highlights a number of
considerations that will protect
wildlife and habitats and integrate
them into the development, such
as retaining existing trees and
hedgerows and the incorporation
of a green corridor. As stated in

Mrs Bell	Introduction – general comment	Observation	Wonder why areas of Lowestoft, i.e. Jeld Wen site etc. are not being developed instead. It appears that the planning committee are hell bent on taking away large areas of	Policy WLP2.14 any planning application for this site will need to be supported by an ecological assessment to determine the existing ecological value of the site. Also, as stated on page 5, any planning application will need to meet the criteria set out in policy WLP8.34 Biodiversity and Geodiversity. Page 5 of the residential development brief also states that any planning application for the site will also need to meet the criteria of policy WLP 8.28 Sustainable Construction. The principle of development on this site was established through the creation of the Local Plan, which is supported by an extensive evidence base and was subject to	None.
			countryside instead of looking at other sites. Surely it would be more acceptable to develop more of Lowestoft than the green areas?	multiple periods of public consultation, as well as a public examination. The Council does not have the remit to control when a	
				planning application is submitted for a site. The Council must also meet its requirements to deliver a 5 Year Housing Land Supply, therefore the development of	

				forward first, cannot be held off until brownfield sites are developed.	
RSPB (lan Robinson)	Introduction – general comment	Observation	No specific comments to make regarding this proposal.	Comments noted.	None.
Mr and Mrs MJ Southwell	Introduction – general comment	Observation	Own house that backs on to development site. Site should not be too densely developed and most importantly some green space and mature trees retained. Many of the trees should be subject to a protection order.	The development framework of the residential development brief has been designed to ensure that the site is developed at a suitable density whilst also ensuring green spaces, such as the green corridor and play space, are delivered. Paragraph 4.9 of the residential development brief states that freestanding trees should be retained and enhanced.	None.
Environment Agency	Introduction – general comment	Observation	No specific comments to make regarding this proposal. No restraint within remit. Would echo that necessary ground investigations are completed.	Comments noted.	None.

David Butcher	Introduction – general comment	N/A	No response.	No response.	None.
Bungay Town Council (Jeremy Burton)	Introduction – general comment	Observation	No specific comments to make regarding this proposal.	Comments noted.	None.
Peter Robertson	Introduction	Objection	Objection to all and any building as there is not housing shortage in Suffolk. Only to gain revenue and 'developers' destroy natural environment. New developments are crammed, dwellings have small rooms and gardens. Greater demand on services such as schools and doctors, greater congestion and pollution. Only second home owners who wish to come here, driving up housing costs. Developers only care about 'bottom line' and affordable housing is a fallacy as it's not affordable. Ignore peoples comments, needs and desires, do	The principle of development on this site was established through the creation of the Local Plan, which is supported by an extensive evidence base and was subject to multiple periods of public consultation, as well as a public examination. The Council does not have the remit to control when a planning application is submitted for a site. The Council must also meet its requirements to deliver a 5 Year Housing Land Supply, therefore the development of greenfield sites, if they come forward first, cannot be held off until brownfield sites are	None.

not want to live in concrete jungle.	developed. The Council worked in
Only Brownfield sites should be	collaboration with infrastructure
developed.	and service providers during the
developed.	
	creation of the Waveney Local Plan
	to establish any infrastructure
	needs that would be required to
	support the site. The Council also
	maintains regular contact with
	infrastructure providers, including
	during the creation of the
	residential development brief, to
	ensure that new development is
	supported by the infrastructure
	that it requires. Any needs
	highlighted by these providers for
	them to be able to provide the
	necessary services have been
	incorporated into the residential
	development brief, which includes
	the potential need for a pre-school.
	The local Clinical Commissioning
	Group, as the local healthcare
	provider, at the time of drafting
	the brief did not identify any
	infrastructure needs to support
	development on this site.

Mr Newsome	Introduction – general comment	Observation	Development fails to consider poor bus provision. Site needs a bus service to be funded or supported between Lowestoft and Blundeston via Parkhill.	Bus stops are located within a 5 minute walking distance from the site, with others being located within 10 minutes. However, the provision of the bus services are outside of the remit of the Council.	None.
David Leeves	Introduction – general comment	Objection	Found comments system difficult to navigate. Already difficult to pull out of junction at Union Lane, this site will only increase traffic in area. Worried about impact on wildlife, endangered bat species has been identified in local area, what assurances can be made that this has been considered? Why is this site being developed over derelict sites. Natural beauty of area should be preserved. Understand need for housing but where will it end? Needs to be a balance with preserving environment and communities.	The consultation system used by the Council is designed by a third party and, while the Council has taken steps to make it as easy to use as possible, there are some elements that are beyond the Councils control. Traffic modelling identified no issues were found that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and have provided comments on the highway network which have been incorporated into the brief. The development framework within the residential development brief highlights a number of considerations that will protect wildlife and habitats and integrate	None.

				them into the development, such as retaining existing trees and hedgerows and the incorporation of a green corridor. As stated in Policy WLP2.14 any planning application for this site will need to be supported by an ecological assessment to determine the existing ecological value of the site. Also, as stated on page 5, any planning application will need to meet the criteria set out in policy WLP8.34 Biodiversity and Geodiversity. The Council does not have the remit to control when a planning application is submitted for a site. The Council must also meet its requirements to deliver a 5 Year Housing Land Supply, therefore the development of greenfield sites, if they come forward first, cannot be held off until brownfield sites are developed.	
Simon Baldry	Introduction – general comment	Observation	How has consultation been undertaken during pandemic? Only saw consultation after reading article on Lowestoft Journal, how does this help elderly residents with no internet? No notice in free	The consultation for the residential development brief followed the processes outlined in the <u>East</u> <u>Suffolk Statement of Community</u> <u>Involvement</u> as closely as possible without breaking the national	None.

papers, would like to see evidence of measures such as social media.restrictions put in place due to the Covid-19 pandemic This includedComment's system is difficult to navigate and signs you out automatically. Road infrastructure is not suitable, with narrow roads and paths and drivers ignoring speed limits. 70% travel overrestrictions put in place due to the Covid-19 pandemic This included Social media. The publicising on social media. The consultation system used by the
Comment's system is difficult to navigate and signs you out automatically. Road infrastructure is not suitable, with narrow roads and paths and drivers ignoringsending emails to everyone listed on the Local Plan and related documents mailing list and publicising on social media. The consultation system used by the
navigate and signs you out automatically. Road infrastructure is not suitable, with narrow roads and paths and drivers ignoringon the Local Plan and related documents mailing list and publicising on social media. The consultation system used by the
automatically. Road infrastructuredocuments mailing list andis not suitable, with narrow roadspublicising on social media. Theand paths and drivers ignoringconsultation system used by the
is not suitable, with narrow roads and paths and drivers ignoring consultation system used by the
and paths and drivers ignoring consultation system used by the
speed limits. 70% travel over Council is designed by a third party
25mph in 20mph zone. and, while the Council has taken
Development will significantly steps to make it as easy to use as
increase this issue. Being used as possible, there are some elements
shortcut to A1117 using a sharp that are beyond the Councils
bend. Will a full environmental and control. Traffic modelling identified
wildlife study be undertaken? no issues were found that could
Doctors and chemist recently not be mitigated against that
closed, are current and future would mean development could
needs taken into consideration? not place on this site. The Council
Will an additional bus route create has also worked in collaboration
more heavy goods vehicle traffic with Suffolk County Council as the
on Oulton Street? New path will local highways' authority in the
not help those who need to walk creation of this residential
along Oulton Street. Building waste development brief and have
already being dumped on burial provided comments on the
site, what surveys and assurances highway network which have been
will be taken to preserve the area? incorporated into the brief. The
Why is this site being developed Council worked in collaboration
before brownfield sites? with infrastructure and service
providers during the creation of
the Waveney Local Plan to
establish any infrastructure needs

that would be required to support
the site. The Council also maintains
regular contact with infrastructure
providers, including during the
creation of the residential
development brief, to ensure that
new development is supported by
the infrastructure that it requires.
Any needs highlighted by these
providers for them to be able to
provide the necessary services
have been incorporated into the
residential development brief,
which includes the potential need
for a pre-school. The local Clinical
Commissioning Group, as the local
healthcare provider, at the time of
drafting the brief did not identify
any infrastructure needs to support
development on this site. The
historic burial ground has been
carefully considered and Policy
WLP2.14 requires that any future
development should avoid impacts
on it. The residential development
brief also highlights that proposals
to enhance this area should be
considered an incorporated into
any future proposals. The Council
does not have the remit to control

				when a planning application is submitted for a site. The Council must also meet its requirements to deliver a 5 Year Housing Land Supply, therefore the development of greenfield sites, if they come forward first, cannot be held off until brownfield sites are developed.	
Andrew Carver	Introduction	Observation	Infrastructure needs are increasing without the development, such as Oulton doctor's surgery closing, more pressure on Bridge Road Surgery. Train crossing at Oulton Broad North already causes delays with will be made worse by around 500 new people on development. Is this development for good of the people or to make money?	The Council worked in collaboration with infrastructure and service providers during the creation of the Waveney Local Plan to establish any infrastructure needs that would be required to support the site. The Council also maintains regular contact with infrastructure providers, including during the creation of the residential development brief, to ensure that new development is supported by the infrastructure that it requires. Any needs highlighted by these providers for them to be able to provide the necessary services have been incorporated into the residential development brief, which includes the potential need for a pre-school. The local Clinical Commissioning	None.

				Group, as the local healthcare provider, at the time of drafting the brief did not identify any infrastructure needs to support development on this site. Traffic modelling identified no issues were found that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and have provided comments on the highway network which have been incorporated into the brief.	
K Gentry	Introduction – general comment	Observation	Bring chaos to roads which are narrow and get very congested. Must be considered where new residents will find new doctors and dentists as it is hard enough already for existing residents. Where are necessary bus services to come from?	Traffic modelling identified no issues were found that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and have provided comments on the highway network which have been incorporated into the	None.

brief. The Council worked in
collaboration with infrastructure
and service providers during the
creation of the Waveney Local Plan
to establish any infrastructure
needs that would be required to
support the site. The Council also
maintains regular contact with
infrastructure providers, including
during the creation of the
residential development brief, to
ensure that new development is
supported by the infrastructure
that it requires. Any needs
highlighted by these providers for
them to be able to provide the
necessary services have been
incorporated into the residential
development brief, which includes
the potential need for a pre-school.
The local Clinical Commissioning
Group, as the local healthcare
provider, at the time of drafting
the brief did not identify any
infrastructure needs to support
development on this site. Bus stops
are located within a 5 minute
walking distance from the site, with
others being located within 10
minutes. However, the provision of

				the bus services are outside of the remit of the Council.	
Historic England	Introduction – general comment	Observation	No specific comments at this time. Suggest seeking specialist conservation and archaeological advisors as relevant. Not necessary to be consulted again on this document unless there are material changes.	Comments noted.	None.
Jordan Egerton	Introduction – general comment	Observation	Worried development will negatively impact house prices in the area. If so, will homeowners be compensated for this?	The impact on local housing prices is not a material consideration when determining a planning proposal as defined by national law, therefore this cannot be a reason to reject or change such a proposal.	None.
National Grid (Avison Young)	Introduction – general comment	Observation	No comments.	Comments noted.	None.

Historic	Introduction –	Observation	No specific comments on the	Comments noted.	None.
England	general		Strategic Environmental		
	comment		Assessment at this time. Suggest		
			seeking specialist conservation and		
			archaeological advisors as relevant.		
			Not necessary to be consulted		
			again on this document unless		
			there are material changes.		
Christine Boar	Introduction –	Objection	Issue with parking at Gresham	The Waveney Local Plan is	None.
	general		Avenue post office. How will roads	supported by traffic modelling	
	comment		cope with 150 homes resulting in	which evaluated the impact on the	
			300-450 new vehicles? Woods	growth proposed in the Local Plan,	
			Loke school is full. Oulton Street is	including this site, on the highway	
			busy and narrow, hard to pull out	network. No issues were found	
			of Oulton Road North. Aldi traffic	that could not be mitigated against	
			lights are already busy. Please sort	that would mean development	
			out road infrastructure. Other	could not place on this site. The	
			areas of land within town that	Council has also worked in	
			could be developed first. Do not	collaboration with Suffolk County	
			take down trees as they will be	Council as the local highways'	
			needed to accommodate	authority in the creation of this	
			additional pollution.	residential development brief and	
				have provided comments on the	
				highway network which have been	
				incorporated into the brief. Once a	
				detailed proposal has been created	
				for this site there will be further	
				consideration of any necessary	
				highways measures that will be	
				needed to make the access to the	

Suffolk County Council (Growth, Highways and Infrastructure – Cameron Clow)	Introduction – general comment		Welcome the brief and appreciate engagement during drafting. May be helpful for brief to state that this is not a comprehensive list of infrastructure requirements, particularly offsite such as school places. Welcome reference to potential need for early years setting, is needed should be easily accessible and near walking and cycling infrastructure, ideally on eastern side. Flood Risk and water Management Team welcome approach to flooding. Would be helpful for flood risk assessment to be included in paragraph 1.7. Site	site safe. The Council does not have the remit to control when a planning application is submitted for a site. The Council must also meet its requirements to deliver a 5 Year Housing Land Supply, therefore the development of greenfield sites, if they come forward first, cannot be held off until brownfield sites are developed. Paragraph 4.9 of the residential development brief states that freestanding trees should be retained and enhanced. Comments noted. Agreed, the infrastructure requirements listed in the residential development brief should not be considered comprehensive and may evolve over time. Any development on this site will be required to meet the criteria of policy WLP8.31 Lifetime Design which includes requirements for designing developments considering those with illnesses such as dementia.	The residential development brief development framework has been reworded to state that the infrastructure requirements currently included should not be considered exhaustive.
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			is located within Middle Super		
			Output Area Waveney 003, within		
			Oulton ward and South Waveney		
			Primary Care Network. Oulton		
			Ward currently has a higher level		
			of residents aged 65 or older		
			(24.6%) than Suffolk and England.		
			Includes relatively deprived and		
			affluent areas. Population aged		
			over 65 predicted to increase by		
			28.6% between 2017 and 2028.		
			Therefore, area performs worse		
			than England as a whole in regard		
			to long term illnesses and		
			disability. Unemployment is also		
			significantly worse. Need to		
			accommodate with designs for		
			those with limited mobility and		
			dementia, this should be		
			referenced in the development		
			framework. Support proposed		
			walking and cycling infrastructure.		
Oulton Parish	Introduction –	Observation	Held consultation event including	The principle of development on	Paragraph 1.2
Council (Lynne	general		presenting consultation documents	this site was established through	of the
Ward)	comment		to provide opportunity for those	the creation of the Local Plan,	residential
i i ai aj	comment		without internet access. Paragraph	which is supported by an extensive	development
			1.2 states that brief was prepared	evidence base and was subject to	brief has been
			in collaboration with landowner,	multiple periods of public	reworded to
			Suffolk County Council and Oulton	consultation, as well as a public	state that the
			Parish Council. Parish Council were	examination. Throughout this	landowners,
	I				

not happy with proposals and	process the site was identified as	Suffolk County
suggested Lilac and Lavender	suitable for residential	Council and
Lodge should be asked if they	development. Paragraph 1.2 of the	Oulton Parish
would consider the site for their	residential development brief has	Council were
expansion plans. Also note that	been reworded to state that the	engaged in the
Consultation Statement refers to	landowners, Suffolk County Council	process.
an initial consultation in 2020 that	and Oulton Parish Council were	
consulted parishes not relevant to	engaged in the process. The	
Oulton.	comments and responses,	
Following comments were agreed:	including those of the various	
Environmental Impact Study is	Parish Councils, included in the	
required over concerns of	Initial Consultation Statement were	
contamination.	responses that were received	
Trees have already been removed	during the consultation on the	
impacting on wildlife.	draft template for the residential	
Environmental wildlife study needs	development briefs would took	
to be conducted due to nearby	place in spring 2020. The	
marshes.	comments do not relate to the	
Drainage issues have been	residential development brief for	
increasing since development of	WLP2.14. As stated in policy	
nearby estate, site is also on a	WLP2.14, any planning application	
floodplain.	will need to be supported by a	
Oulton Street has a very narrow	contamination assessment,	
pavement forcing pedestrians onto	ecological assessment, transport	
road to pass each other and must	assessment and travel plan. Any	
contend with speeding traffic.	planning application will also need	
150 homes could lead to 300 new	to provide relevant supporting	
cars. 72,000 vehicles recorded per	documents as outlined in the East	
month by OPC Speed Information	Suffolk Local Validation List. Any	
Device, increased to 135,000 since	planning application will also need	

lockdown lifted. 69% speed	to meet the criteria of the planning
through the area.	policies listed on page 5, which
No confidence that ESC will sort	includes policies covering housing
out traffic issues, access will be	mix and tenure, biodiversity and
dangerous.	sustainable construction.
Proposed entrance is opposite	Paragraph 4.9 of the residential
listed buildings.	development brief states that
Union Lane crossroads is an	
	freestanding trees should be
accident black spot, no lighting or	retained and enhanced. Paragraphs
street paths.	4.14 and 4.15 outline requirements
Cycleways should be incorporated	regarding drainage including
into roads and should not lead to	additional investigations that are
loss of fields.	needed to fully establish what
Emphasis should be on brownfield	would be appropriate for the site.
sites before greenfield.	These requirements have been
Already enough development in	drafted in collaboration with
area with Woods Meadow and	Suffolk County Council as the lead
Land North of Lowestoft (1400	local flood authority. The Waveney
homes)	Local Plan is supported by traffic
Lack of local amenities, constant	modelling which evaluated the
reliance on vehicles.	impact on the growth proposed in
Local infrastructure is already	the Local Plan, including this site,
stretched, Bridge Road Surgery at	on the highway network. No issues
capacity and dentists not taking on	were found that could not be
new patients.	mitigated against that would mean
Oulton neighbourhood Plan has	development could not place on
identified need for homes for	this site. The Council has also
elderly, such as bungalows.	worked in collaboration with
Suffolk Heritage Map Explorer	Suffolk County Council as the local
refers to WWII defensives systems	highways' authority in the creation

and pillboxes at Airey Close and	of this residential development
Blue Boar, not reference in brief.	brief and have provided comments
Letter received from resident who	on the highway network which
stated that machinery and soil	have been incorporated into the
heaps located on burial ground.	brief. Once a detailed proposal has
Sent to MP who said he would take	been created for this site there will
this up with Council.	be further consideration of any
Brief Historical Report was	necessary highways measures that
prepared on Oulton Workhouse in	will be needed to make the access
2017. 896 men, women and	to the site safe. The Council does
children interred at burial ground.	not have the remit to control when
1890 Board of Guardian reported	a planning application is submitted
drainage issues.	for a site. The Council must also
	meet its requirements to deliver a
	5 Year Housing Land Supply,
	therefore the development of
	greenfield sites, if they come
	forward first, cannot be held off
	until brownfield sites are
	developed. The Council worked in
	collaboration with infrastructure
	and service providers during the
	creation of the Waveney Local Plan
	to establish any infrastructure
	needs that would be required to
	support the site. The Council also
	maintains regular contact with
	infrastructure providers, including
	during the creation of the
	residential development brief, to

				ensure that new development is supported by the infrastructure that it requires. Any needs highlighted by these providers for them to be able to provide the necessary services have been incorporated into the residential development brief, which includes the potential need for a pre-school. The local Clinical Commissioning Group, as the local healthcare provider, at the time of drafting the brief did not identify any infrastructure needs to support development on this site. The historic burial ground has been carefully considered and Policy WLP2.14 requires that any future development should avoid impacts on it. The residential development brief also highlights that proposals to enhance this area should be considered an incorporated into any future proposals.	
V T Hathway	Introduction – general comment	Objection	Can't see why this site should be developed when main access is via a B Road which becomes narrower as you enter the village. Both sides are little more than lanes and used as 'rat-runs' between Somerleyton	The principle of development on this site was established through the creation of the Local Plan, which is supported by an extensive evidence base and was subject to multiple periods of public	None.

			Road and the B1375, as well as access for Stirling Close. Junction at Somerleyton Road and Oulton Road North is used as a crossing point for school children attending Benjamin Britten School and as a drop off area, bring traffic to a halt. An additional 150 extra vehicles could be a detriment to road safety. Little information provided on how these will be overcome. Already a problem with speeding vehicles and weight of vehicles allowed through the village. Pavements are narrow. Little mention of facilities for additional 150 families, appears Oulton is slowly being absorbed into Lowestoft.	consultation, as well as a public examination. The Waveney Local Plan is supported by traffic modelling which evaluated the impact on the growth proposed in the Local Plan, including this site, on the highway network. No issues were found that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and have provided comments on the highway network which have been incorporated into the brief. Once a detailed proposal has been created for this site there will be further consideration of any necessary highways measures that will be needed to make the access to the site safe.	
Water Management Alliance (Elanor Roberts)	Introduction	Observation	No comments.	Comments noted.	None.

Geoffrey	Introduction –	Observation	Live in Grade II listed building	The Waveney Local Plan is	None.
Hawes	general		opposite site entrance, concerned	supported by traffic modelling	
	comment		over safety and convenience.	which evaluated the impact on the	
			Previous owner denied additional	growth proposed in the Local Plan,	
			access for 1 or 2 cars, surely 300	including this site, on the highway	
			cars will be more dangerous. Roads	network. No issues were found	
			are becoming busier especially	that could not be mitigated against	
			junction of Union Lane, Parkhill	that would mean development	
			and Oulton Road North. How will	could not place on this site. The	
			the access be developed? Would it	Council has also worked in	
			be better to join to Union Lane and	collaboration with Suffolk County	
			create a roundabout at Union	Council as the local highways'	
			Lanes access to Parkhill? What will	authority in the creation of this	
			be done to encourage road users	residential development brief and	
			to use Millennium Way? Could	have provided comments on the	
			access to Parkhill be restricted to	highway network which have been	
			residents only? Refer to needing to	incorporated into the brief. Once a	
			account for impact on listed	detailed proposal has been created	
			buildings but with this	for this site there will be further	
			development we will be	consideration of any necessary	
			surrounded, broken hedge on	highways measures that will be	
			Parkhill will not compensate for	needed to make the access to the	
			the impacts. Also concerned over	site safe. Any development on the	
			the impacts on flooding from these	site will need to consider how it	
			new developments either side as	will impact the setting of the two	
			water table is high, could measures	listed buildings on the opposite	
			be put towards the west of the	side of Parkhill due to their	
			site? Could development closest to	statutory protection. Paragraph	
			the listed buildings be one storey?	4.10 also highlights some	
			Water pressure is low and getting	considerations that could be	

Suffolk Fire	Introduction –	Observation	worse. Need to be assured that path along new housing will be wide and safe enough to access from other side of road, paths further down are dangerously narrow. Need to greatly consider access to site, 20mph signing should be taken further up Parkhill, almost up to hotel. Work should not begin until development on Badger Building site has been completed and only take place between 8am and 5pm on weekdays.	incorporated to protect the settings of these buildings. Paragraphs 4.14 and 4.15 outline requirements regarding drainage including additional investigations that are needed to fully establish what would be appropriate for the site. These requirements have been drafted in collaboration with Suffolk County Council as the lead local flood authority. The Council does not have the remit to control when a planning application is submitted for a site. Conditions relating to the safe construction of the site will be established at the planning application stage. Comments noted.	None.
and Rescue Service (Angela Kempen)	general comment		would request that any new proposal regarding build for access or water for fire-fighting provision is submitted to the Suffolk Fire and Rescue Service via the normal consultation process.		
Kate Wagner	Introduction – general comment	Observation	No comments as not statutory consultee. (Health and Safety Executive)	Comments noted.	None.

Broads	Introduction –	Observation	Landscape Officer: Approximately	Comments noted. Page 3 of the	None.
Authority	general		50m from nearest boundary to	residential development brief	
(Cheryl Peel)	comment		broads, visual effects may be	states that any future planning	
			limited due to intervening	applications will need to meet the	
			woodland and planting. Several	criteria of policy WLP8.35	
			footpaths between site and Broads	Landscape Character which makes	
			area, need to consider in terms of	specific reference to the Broads	
			opportunities and impacts. Need to	and the Broads Landscape	
			fully consider impact on Broads	Character Assessment, meaning	
			possibly through Landscape Visual	there will need to be consideration	
			Impact Assessment for a	of the Broads area through the	
			development of this size. Despite	design of any scheme. Paragraphs	
			potential lack of visual impact this	4.6 and 4.11 of the residential	
			still needs to be considered as part	development brief both outline	
			of masterplan next steps. Will	how open spaces should be	
			depend largely on scale of	incorporated into a development	
			buildings being developed. Planting	on this site. Paragraph 4.9 of the	
			along western edge could help	residential development brief	
			mitigate any impacts.	states that freestanding trees	
			Environment officer: fully support	should be retained and enhanced.	
			inclusion of RAMS and	Comments from Suffolk Wildlife	
			development should incorporate	Trust will be sort where there is the	
			green space for leisure to reduce	potential for impacts on County	
			need for travel. Large freestanding	Wildlife Sites.	
			trees should be retained where		
			possible, hedgerows that are		
			retained should be enhanced and a		
			green corridor should be		
			incorporated into the site. Dog		
			waste bins should be provided on		

			footpaths. Suffolk Wildlife Trust should be consulted as early as possible on potential impacts on County Wildlife Sites.		
Suffolk County Council (Hannah Cutler)	Introduction – general comment	Observation	Included copy of advice provided regarding former Lothingland Hospital and Parkhill sites during Local Plan consultations. Historic burial ground does present a constraint and site should be subject to up front archaeological research, assessment and evaluation. This should inform the design of the site and should be avoided despite apparently being damaged in part already. Will also allow mitigation strategy to be determined. Eastern part of the site will also require archaeological evaluation, however this can be part of a condition of any granted planning permission.	Comments noted. The historic burial ground has been carefully considered and Policy WLP2.14 requires that any future development should avoid impacts on it. The residential development brief also highlights that proposals to enhance this area should be considered an incorporated into any future proposals.	None.

Stephen Bould	Introduction – general comment	Observation	States that if further evidence comes to light a different approach may need to be taken. This is now the case as there has been growing awareness in the area that this proposal has serious demographic, environmental and transport implications and will have serious	Comments noted. The principle of development on this site was established through the creation of the Local Plan, which is supported by an extensive evidence base and was subject to multiple periods of public consultation, as well as a public examination.	None.
Natural England (Sam Kench)	Introduction – general comment	Observation	deleterious consequences. No objection if appropriate mitigation is secured. Without mitigation could have an adverse effect on Benacre to Easton Bavents Lagoons SAC, Benacre to Easton Bavents SPA and Pakefield to Easton Bavents SSSI. Advise contributions to RAMS and inclusion of well-designed open green space. Located close to Broads National Park, national and local policies should be used in determination, such as NPPF paragraph 172. Landscape advisor/planner for the Broads will be best placed to advise. Any proposal should incorporate measures to improve access to natural environment, such as new footpaths and bridleways and further links to the green	Comments noted. Paragraphs 1.9 and 1.10 of the residential development brief outlines that the site is subject to RAMS contributions by being located in Zone of Influence B., as well as links to further information on other requirements that may be necessary to mitigate the impacts of the site. Paragraphs 4.6 and 4.11 of the residential development brief both outline how open spaces should be incorporated into a development on this site.	None.

			infrastructure network. Biodiversity Net Gain should be considered through NPPF paragraphs 170 and 175.		
Health and Safety Executive (Shirley Rance)	Introduction – general comment	Observation	HSE may consider this information should a planning application be made in the vicinity of any relevant explosives site.	Comments noted.	None.
Brian Sutton	Introduction – general comment	Observation	Whole character of northern approaches to Lowestoft will be adversely affected by new housing estates at Woods meadow, Blundeston and Corton. Density proposed on this site is too high with little room for grass verges, open space and greenery.	Page 3 of the residential development brief states that any future planning applications will need to meet the criteria of policy WLP8.35 Landscape Character which makes specific reference to the need to protect the special characteristics of landscape areas. Paragraph 3.13 highlights some of these key elements which will need to be considered by the design of any scheme on this site. The density set out in the residential development brief and policy WLP2.14 is an approximate figure. The final density of the site will need to balance the need to deliver	None.

				housing at a viable level whilst also ensuring good design and delivering the other requirements set out in the policy, such as open space. Paragraphs 4.6 and 4.11 of the residential development brief both outline how open spaces should be incorporated into a development on this site.	
Gaius Hawes	Introduction – general comment	Observation	Burial ground located in north perimeter where 896 unmarked graves are located. Land is not consecrated but all were given Christian burial. A parish church once stood between the hospital and the Somerleyton Road and the old hospital had its own church. I have also been given to understand that Italian prisoners where held there during the war, so where if any of their bodies would be buried.	Comments noted. The historic burial ground has been carefully considered and Policy WLP2.14 requires that any future development should avoid impacts on it. The residential development brief also highlights that proposals to enhance this area should be considered an incorporated into any future proposals.	None.
Secretary of State for Education	Introduction – general comment	Observation	Please note that any regeneration that will impact on existing school land, whether an appropriation or change of use, may require the prior consent of the Secretary of State for Education. In the first instance queries should be directed	Comments noted.	None.
			to the department's land transactions team.		
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Councillor Andree Gee	Introduction – general comment	Observation	Concerned about wording 'approximately 30 dwellings per hectare' and would prefer to be no more than or up to 30. This Opinion is strongly held by the Parish Council and local residents.	The requirement for the site to deliver 'approximately 30 dwellings per hectare' is established in the policy from the adopted Waveney local Plan. As a Supplementary Planning Document, the residential development brief cannot change policy criteria or be contradictory to them, therefore the wording of 'approximately' cannot be changed.	None.
William Robertson	Policy Context – general comment	Observation	Light coloured area at top left is burial ground for several hundred people. There was an agreement with a developer to have the area fenced off, marked with a historic information board and would be landscaped. Trust this will be adhered to. This fact must also be disclosed to future occupants.	The historic burial ground has been carefully considered and Policy WLP2.14 requires that any future development should avoid impacts on it. The residential development brief also highlights that proposals to enhance this area should be considered an incorporated into any future proposals. The exact nature of these enhancements will be established at the time a planning application is submitted	None.

			or during pre-application discussions.	
George Redpath	Policy Context – Figure 1 Policy WLP2.14	Where referencing new pedestrian and cycle access on Union Lane, change should to must. National priority and financial assistance is being offered. Development must be linked to town centre. Also, why can I not cut and paste into box when making comments?	The Council and the residential development acknowledge the importance of pedestrian and cycle connections to make new developments sustainable. The Council will expect the connections outlined in the residential development brief to be explored. Policy WLP2.14 is part of the Waveney Local Plan went through public examination to ensure it was 'sound' and was subsequently adopted in March 2019. The residential development brief, once adopted, will be a Supplementary Planning Document. Therefore, while it will carry weight during the determination of a planning application, it cannot change or add additional policy criteria. The consultation software used by the Council is created by a third party	None.

				and therefore the Council cannot change how the system operates.	
Cycling UK (John Thompson)	Policy Context – figure 1 Policy WLP2.14	Observation	I would be grateful for the full details of what is proposed for the cycling facility connecting Union Lane. I would also appreciate seeing the Travel Plan.	The full details of the cycling connections to Union Lane and the Travel Plan will be available when a planning application is received.	None.
Oulton Parish Council (Tony Knights)	Policy Context – general comment	Observation	Extremely concerned over vehicular entrance from Parkhill. Latest data speed indicator device shows between 28 th February 2021 and 28 th March 2021 shows 111,085 vehicles travelled southbound, average of 3897 per day. 75% over speed limits with speeds of up to 80mph. Parkhill is single lane in both directions with no pavement, 2 listed buildings and residential properties, and is an unrestricted lorry route. Development would mirror Union Lane which is a dangerous junction. Accidents have happened at the	The Waveney Local Plan is supported by traffic modelling which evaluated the impact on the growth proposed in the Local Plan, including this site, on the highway network. No issues were found that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and have provided comments on the highway network which have been incorporated into the brief. Once a	None.

			junction and along residential properties, but not all reported.	detailed proposal has been created for this site there will be further consideration of any necessary highways measures that will be needed to make the access to the site safe.	
Kevin Sullivan	Policy Context – general comment	Observation	Concerned that access appears to be near accident black spot. Would also prefer brownfield sites in Oulton broad to be developed before greenfield.	The Waveney Local Plan is supported by traffic modelling which found no issues that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief. Once a detailed proposal has been created for this site there will be further consideration of any necessary highways measures that will be needed to make the access to the site safe. Then the final form of the access to the site will be established. The Council does not have the remit to control when a planning application is submitted for a site. The Council must also meet its requirements to deliver a 5 Year Housing Land Supply,	None.

				therefore the development of greenfield sites, if they come forward first, cannot be held off until brownfield sites are developed.	
Norman Castleton	Policy Context – general comments, paragraph 2.1 and 2.2 and Figure 1 WLP2.14	Observation	Energy and water provision?	The Council worked in collaboration with infrastructure and service providers during the creation of the Waveney Local Plan to establish any infrastructure needs that would be required to support the site. The Council also maintains regular contact with infrastructure providers, including during the creation of the residential development brief, to ensure that new development is supported by the infrastructure that it requires. Any needs highlighted by these providers for them to be able to provide the necessary services have been incorporated into the residential development brief. No specific issues relating to energy and water provision were identified by providers.	None.

Young	Policy Context – general comment	Observation	This will cause a lot of traffic and will disrupt the dementia residents at the care home. Nothing came up on searches when buying new house.	The Waveney Local Plan is supported by traffic modelling which evaluated the impact on the growth proposed in the Local Plan, including this site, on the highway network. No issues were found that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and have provided comments on the highway network which have been incorporated into the brief. Once a detailed proposal has been created	None.
				detailed proposal has been created for this site there will be further consideration of any necessary highways measures that will be needed to make the access to the site safe.	
Karma McLean	Policy Context – paragraph 2.1	Observation	Environmental impact assessment is required due to potential issues such as pollution, extinction, depletion of resources and habitat destruction. Already concerns about water damage. Once a stream which ran in parallel to	As stated in policy WLP2.14, any planning application will need to be supported by a contamination assessment, ecological assessment, transport assessment and travel plan. Any planning application will also need to provide relevant	None.

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houses off Union Lane which back	supporting documents as outlined
into site and calls to unblock a	in the East Suffolk Local Validation
drain which has caused subsidence	List. Any planning application will
for some dwellings. Will cause	also need to meet the criteria of
extinction of species using are as	the planning policies listed on page
their home, including pheasants,	5, which includes policies covering
owls, foxes, muntjac, bats etc. not	housing mix and tenure,
enough open space has been left in	biodiversity and sustainable
plans. Additional population will	construction. Paragraphs 4.6 and
causes pollution that will affect	4.11 of the residential
wildlife.	development brief both outline
	how open spaces should be
	incorporated into a development
	on this site. The development
	framework within the residential
	development brief highlights a
	number of considerations that will
	protect wildlife and habitats and
	integrate them into the
	development, such as retaining
	existing trees and hedgerows and
	the incorporation of a green
	corridor. As stated in Policy
	WLP2.14 any planning application
	for this site will need to be
	supported by an ecological
	assessment to determine the
	existing ecological value of the site.
	Also, as stated on page 5, any
	planning application will need to

				meet the criteria set out in policy WLP8.34 Biodiversity and Geodiversity. Paragraphs 4.14 and 4.15 outline requirements regarding drainage including additional investigations that are needed to fully establish what would be appropriate for the site. These requirements have been drafted in collaboration with Suffolk County Council as the lead local flood authority.	
MacMillan	Policy Context – general comment	Observation	Main concern is extra vehicles coming out to a very tricky junction, can't see how small junction will safely cope with extra vehicles. Theoretically 300 new cars using already dangerous junction. Will there be further funding for doctors?	Traffic modelling did not identify any issues that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and their comments have been incorporated into the brief. The final form of the access to the site will be determined when a detailed proposal has been drafted. The Council worked in collaboration with infrastructure and service providers during the creation of the Waveney Local Plan	None.

				to establish any infrastructure needs that would be required to support the site. The Council also maintains regular contact with infrastructure providers, including during the creation of the residential development brief, to ensure that new development is supported by the infrastructure that it requires. Any needs highlighted by these providers for them to be able to provide the necessary services have been incorporated into the residential development brief. The local Clinical Commissioning Group, as the local healthcare provider, at the time of drafting the brief did not identify any infrastructure needs to support development on this site.	
Gary Edwards	Policy Context – general comment	Observation	Concern over increased traffic joining busy route from Blundeston Roundabout heading towards Oulton Broad. Minimum 2 additional vehicles per dwelling will add to traffic issues, especially each time railway barrier is used in Oulton Broad North and South Stations. Design and access to	The Waveney Local Plan is supported by traffic modelling which evaluated the impact on the growth proposed in the Local Plan, including this site, on the highway network. No issues were found that could not be mitigated against that would mean development could not place on this site. The	None.

			Parkhill will cause frustration and accidents cannot be ruled out. What has been put in place to negate this?	Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and their comments have been incorporated into the brief. The final form of the access to the site will be determined when a detailed proposal has been drafted.	
Gary Edwards	Policy Context – general comment	Observation	Same as above.	Same as above.	None.
Stephen Reeves	Policy Context – general comment	Observation	Whole area has a lovely countryside feel. To 'gentrify' footpaths and widen them would spoil this, would strongly object to this. Union Lane is narrow and is walked a great deal. Already been several near misses, to increase traffic would only bring forward an accident.	Page 3 of the residential development brief states that any future planning applications will need to meet the criteria of policy WLP8.35 Landscape Character which makes specific reference to the need to protect the special characteristics of landscape areas. Paragraph 3.13 highlights some of these key elements which will need to be considered by the design of any scheme on this site. Traffic modelling did not identify any issues that could not be mitigated	None.

				against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and their comments have been incorporated into the brief. The final form of the access to the site will be determined when a detailed proposal has been drafted.	
Roger Hillier	Policy Context – figure 1 Policy WLP2.14	Observation	Greatly concerned about size of development. Originally set for 24 dwellings per hectare, how has this been able to change as this increases the traffic using Parkhill. Traffic constantly speeds through the village and junction at Union Lane can be dangerous already. Accidents will be likely at new junction. How can a pavement be extended that is already too narrow on Parkhill.	The density set out in the residential development brief and policy WLP2.14 is an approximate figure. The final density of the site will need to balance the need to deliver housing at a viable level whilst also ensuring good design and delivering the other requirements set out in the policy, such as open space. Traffic modelling did not identify any issues that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation	None.

				of this residential development brief and their comments have been incorporated into the brief. Once a detailed proposal has been created for this site there will be further consideration of any necessary highways measures that will be needed to make the access to the site safe.	
Norman Castleton	Policy context – general comment, paragraphs 2.1 and 2.2 and Figure 1 Policy WLP2.14	Observation	Who are these houses for? Ring fence affordable housing for those who need it. Energy and water provision? Environmental protection and mitigation measures? Transportation? Every element of this is general with no specific targets, allowing developers to get away with absolute minimums.	Any future planning applications will need to meet the requirements of policy WLP8.2 Affordable Housing as stated on page 5 of the residential development brief. The Council worked in collaboration with infrastructure and service providers during the creation of the Waveney Local Plan to establish any infrastructure needs that would be required to support the site. The Council also maintains regular contact with infrastructure providers, including during the creation of the residential development brief, to ensure that new development is supported by the infrastructure that it requires. Any needs highlighted by these providers for them to be able to provide the necessary services	None.

				have been incorporated into the residential development brief, which includes the potential need for a pre-school.	
Karen Hillier	Policy context – general comment	Observation	Original intentions stated 24 dwellings per hectare, now risen to 30! Vehicular access will add extra traffic to village on a road that is already difficult to access at peak times. Abundance of wildlife on site. 150 dwellings will destroy our view and place home in the middle of a housing estate. This will generate noise pollution. A pre- school will create additional noise and traffic.	The density set out in the residential development brief and policy WLP2.14 is an approximate figure. The final density of the site will need to balance the need to deliver housing at a viable level whilst also ensuring good design and delivering the other requirements set out in the policy, such as open space. The impact on views from existing dwellings close to a development site is not a material consideration as defined by national law when determining a planning application or considering a site for allocation. Traffic modelling did not identify any issues that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation	None.

				of this residential development brief and their comments have been incorporated into the brief. The final highway and access layout of the site will be determined at the planning application stage.	
Philip Monument	Policy context – general comment	Observation	Consideration of a pre-school setting? Already need to wait weeks for doctors appointment and now want to add more people. Need to consider another medical centre not another school, and a village shop!	The Council worked in collaboration with infrastructure and service providers during the creation of the Waveney Local Plan to establish any infrastructure needs that would be required to support the site. The Council also maintains regular contact with infrastructure providers, including during the creation of the residential development brief, to ensure that new development is supported by the infrastructure that it requires. Any needs highlighted by these providers for them to be able to provide the necessary services have been incorporated into the residential development brief, which includes the potential need for a pre-school. The potential need for a pre-school setting has been highlighted by Suffolk County Council as the lead	None.

				education provider. The need for this will be established at the time of a planning application. The local Clinical Commissioning Group, as the local healthcare provider, at the time of drafting the brief did not identify any infrastructure needs to support development on this site.	
Chris Edwards	Policy context – general comment and Figure 1 Policy WLP2.14	Observation	Comment on behalf of Justin Dowley: This site sets a precedent for future development on other sites. Complies with proposed development which was found sound at examination. Note the low land values in area which could lead to lower levels of affordable housing. Landowner collaboration is not a prerequisite for a site to come forward and a lack of does not mean a site cannot come forward. If this is being set out as a prerequisite this is hereby challenged.	Comments noted. Any future planning applications will need to meet the requirements of policy WLP8.2 Affordable Housing as stated on page 5 of the residential development brief. The Council has engaged with multiple stakeholders for this site during the drafting of the residential development brief. Whilst this is not a requirement, this was done to ensure that the content of the document will bring forward the most appropriate development on the site.	None.
Stephen Bould	Policy context – general comment	Observation	WLP8.2 Assume that those who take up affordable housing have less disposable income, therefore provision of proper pedestrian access and protection against flooding will be more even more	Comments noted. Paragraphs 4.18 – 4.20 highlight the importance of walking and cycling infrastructure and where this should be located to ensure the site is connected to the wider area. Paragraphs 4.14	None.

	important. WLP8.21 Sustainable	and 4.15 outline requirements	
	transport is laudable but	regarding drainage including	
	uniformed by experience. B1375 is	additional investigations that are	
	dangerous and inadequate.	needed to fully establish what	
	WLP8.24 this development will	would be appropriate for the site.	
	significantly increase non-porous	These requirements have been	
	areas and adversely affect natural	drafted in collaboration with	
	drainage.	Suffolk County Council as the lead	
		local flood authority. The Waveney	
		Local Plan is supported by traffic	
		modelling which evaluated the	
		impact on the growth proposed in	
		the Local Plan, including this site,	
		on the highway network. No issues	
		were found that could not be	
		mitigated against that would mean	
		development could not place on	
		this site. The Council has also	
		worked in collaboration with	
		Suffolk County Council as the local	
		highways' authority in the creation	
		of this residential development	
		brief and have provided comments	
		on the highway network which	
		have been incorporated into the	
		·	
		brief.	

Scott Miles	Understanding	Observation	Builders already been in and	The development framework	None.
	the Place –		cleared some land. This has had a	within the residential development	
	general		disastrous effect on habitats and	brief highlights a number of	
	comment and		animals including deer and owls.	considerations that will protect	
	Figure 2		Won't be long until newts and	wildlife and habitats and integrate	
			frogs are gone as well. Also	them into the development, such	
			concerned over water levels and	as retaining existing trees and	
			flooding when natural drainage is	hedgerows and the incorporation	
			removed. Already waterlogged in	of a green corridor. As stated in	
			winter. Concerned about being	Policy WLP2.14 any planning	
			overlooked.	application for this site will need to	
				be supported by an ecological	
				assessment to determine the	
				existing ecological value of the site.	
				Also, as stated on page 5, any	
				planning application will need to	
				meet the criteria set out in policy	
				WLP8.34 Biodiversity and	
				Geodiversity. Paragraphs 4.14 and	
				4.15 outline requirements	
				regarding drainage including	
				additional investigations that are	
				needed to fully establish what	
				would be appropriate for the site.	
				These requirements have been	
				drafted in collaboration with	
				Suffolk County Council as the lead	
				local flood authority.	

Roger Hillier	Understanding the Place – paragraph 3.9	Observation	Existing issues with sewerage system which needs to be looked into.	Paragraphs 4.14 and 4.15 outline requirements regarding drainage including additional investigations that are needed to fully establish what would be appropriate for the site. These requirements have been drafted in collaboration with Suffolk County Council as the lead local flood authority.	None.
Karen Hillier	Understanding the Place – general comment	Observation	Consideration needs to be given to the dwellings that overlook the area, currently look over countryside. If given permission will be in the middle of a housing estate. We do not want to lose the wildlife and peace of the countryside.	The impact on views from existing dwellings close to a development site is not a material consideration as defined by national law when determining a planning application or considering a site for allocation.	None.
Sally Cook	Understanding the Place – general comment	Objection	Vehemently oppose this development on the basis of no further habitats being destroyed. There is far too much development on 'green sites', where is wildlife supposed to go? Only development should be redevelopment of buildings and brownfield land. Proposed access onto Union Lane is absurd as already busy, pavement only part way down and is narrow. Junction at Union Lane and Oulton Street is already busy	The development framework within the residential development brief highlights a number of considerations that will protect wildlife and habitats and integrate them into the development, such as retaining existing trees and hedgerows and the incorporation of a green corridor. As stated in Policy WLP2.14 any planning application for this site will need to be supported by an ecological assessment to determine the	None.

at peak times with numerous	existing ecological value of the site.
accidents. Oulton is a village and	Also, as stated on page 5, any
0	
should remain so, developments	planning application will need to
will destroy this.	meet the criteria set out in policy
	WLP8.34 Biodiversity and
	Geodiversity. The Council does not
	have the remit to control when a
	planning application is submitted
	for a site. The Council must also
	meet its requirements to deliver a
	5 Year Housing Land Supply,
	therefore the development of
	greenfield sites, if they come
	forward first, cannot be held off
	until brownfield sites are
	developed. The Waveney Local
	Plan is supported by traffic
	modelling which evaluated the
	impact on the growth proposed in
	the Local Plan, including this site,
	on the highway network. No issues
	were found that could not be
	mitigated against that would mean
	development could not place on
	this site. The Council has also
	worked in collaboration with
	Suffolk County Council as the local
	highways' authority in the creation
	of this residential development
	brief and have provided comments

				on the highway network which have been incorporated into the brief. Once a detailed proposal has been created for this site there will be further consideration of any necessary highways measures that will be needed to make the access to the site safe.	
Oulton Ben	Understanding the Place – general comment	Support	Generally a good choice of site, the proposal is supported. However, paragraph 4.21 gives rise to come concern.	Comments noted.	None.
Stephen Bould	Understanding the Place – general comment	Observation	The map is significantly out of date – fails to show almost completed development of Fallowfields to same intensity as Millennium Way. 3.1 – whole of eastern and southern parts of the present parish have been built over since late 1960s, leaving only a fringe of its original rural character to the north and west. This development will further erode that fringe and create third large extension of Lowestoft urban area.	Comments noted. The Fallowfields development is not referenced and mapped on figures 2 and 5 of the residential development brief. Page 3 of the residential development brief states that any future planning applications will need to meet the criteria of policy WLP8.35 Landscape Character which makes specific reference to the Broads and the Broads Landscape Character Assessment, meaning there will need to be consideration of the Broads area through the design of any scheme.	The Fallowfields development is not referenced and mapped on figures 2 and 5 of the residential development brief.

Suffolk County Council – Growth, Highways and Infrastructure (Cameron Clow)	Understanding the Place – general comment	Observation	It may be helpful to highlight other permitted development and local plan allocations. Could be used to make clear links between developments, especially WLP2.15 on figure 2 and 4.	Comments noted. The Fallowfields development is not referenced and mapped on figures 2 and 5 of the residential development brief.	The Fallowfields development is not referenced and mapped on figures 2 and 5 of the residential development brief.
Cycling UK (John Thompson)	Natural and Historic Environment – paragraph 3.14	Observation	As trees do not have tree protection orders, will they be removed? If so, will they be mitigated?	The residential development brief states that existing trees on the site should be retained in incorporated into the development wherever possible. This works in conjunction with Policy WLP8.34 Biodiversity and Geodiversity which looks to retain and enhance the natural environment where possible.	None.
Scott Miles	Natural and Historic Environment – paragraph 3.19	Observation	Water table already high, especially since trees have been cleared. Need to consider drainage once natural drainage is gone.	Paragraphs 4.14 and 4.15 outline requirements regarding drainage including additional investigations that are needed to fully establish what would be appropriate for the site. These requirements have been drafted in collaboration with Suffolk County Council as the lead local flood authority.	None

Karma McLean	Natural and Historic Environment – paragraphs 3.17 and 3.19	Observation	Already calls to unblock a drain that is overflowing on Parkhill and back gardens have subsided slightly (attachments). Land area and drainage needs to be assessed prior to the additional houses	Paragraphs 4.14 and 4.15 outline requirements regarding drainage including additional investigations that are needed as part of any planning application. The results of these studies will be used to fully	None.
			being built.	establish what would be appropriate for the site. These requirements have been drafted in collaboration with Suffolk County Council as the lead local flood authority.	
Roger HIllier	Natural and Historic Environment – paragraphs 3.14 and 3.19	Observation	Some trees already cut down so concerned more will follow if no TPOs. Trees and hedgerows along the edges should be protected. Wildlife relies on trees for habitats. Site gets very wet and ditches have got very close to over flowing.	The residential development brief states that existing trees on the site should be retained in incorporated into the development wherever possible. This works in conjunction with Policy WLP8.34 Biodiversity and Geodiversity which looks to retain and enhance the natural environment where possible. Paragraphs 4.14 and 4.15 outline requirements regarding drainage including additional investigations that are needed to fully establish what would be appropriate for the site. These requirements have been drafted in collaboration with Suffolk County	None.

				Council as the lead local flood authority.	
Stephen Bould	Natural and Historic Environment – paragraph 3.15	Observation	The Grade II listed properties up to three years ago were surrounded on all four sides by open land and woodland. With this site they will be surrounded on three sides by dense housing of entirely different age and character. This does not constitute taking full account of their setting in terms of potential impacts on significance.	The principle of development on this site was established through the creation of the Local Plan, which is supported by an extensive evidence base and was subject to multiple periods of public consultation, as well as a public examination. Paragraph 4.10 of the residential development brief highlights considerations that should be incorporated into any development on the site to make the development sympathetic to the nearby listed buildings.	None.
Stephen Bould	Natural and Historic Environment – paragraph 3.18	Observation	Is the Council absolutely sure that there is no remains of unauthorised animals burials following disease, especially in the area of the proposed children's recreation area?	Policy WLP2.14 states that a contamination assessment is required as part of any planning application. This will determine if there are any contamination issues on this site and how these should be mitigated.	None.

Stephen Bould	Natural and	Observation	This paragraph shows that proper	Paragraphs 4.14 and 4.15 outline	None.
	Historic		drainage is necessary and may not	requirements regarding drainage	
	Environment –		be possible what specific plans	including additional investigations	
	paragraph 3.19		have been made to improve	that are needed to fully establish	
			sewerage in this area? Already	what would be appropriate for the	
			insufficient drainage in some areas	site. These requirements have	
			leading to frequent flooding. 150	been drafted in collaboration with	
			dwellings will generate a large	Suffolk County Council as the lead	
			amount of sewerage and hard	local flood authority.	
			surfaces with increase load.		
Jonathan	Natural and	Observation	As you know this site contains a	The historic burial ground has been	None.
Hawes	Historic		historic burial ground used	carefully considered and Policy	
	Environment –		between 1834 and 1899 where at	WLP2.14 requires that any future	
	paragraph 3.16		least 896 people are interred	development should avoid impacts	
			(historic report attached). Land is	on it. The residential development	
			not consecrated, but would like to	brief also highlights that proposals	
			know what considerations and/or	to enhance this area should be	
			amendments are being made in	considered an incorporated into	
			regards to the burial ground in the	any future proposals. The exact	
			planning of the redevelopment of	nature of these enhancements will	
			the land.	be established at the time a	
				planning application is submitted	
				or during pre-application	
				discussions.	
Brian Sutton	Natural and	Observation	The freestanding trees should be	Comments noted. Paragraph 4.9 of	None.
	Historic		protected by orders as art of a	the residential development brief	
	Environment –		plan, Trees - mature ones 50-100	states that freestanding trees	
	paragraph 3.14		years and loss great for	should be retained and enhanced.	
			biodiversity.		

Brian Sutton	Natural and Historic Environment – paragraph 3.16	Observation	Not happy that the burial site be so encroached upon by 150 dwellings. It should not be included in the whole site.	The historic burial ground has been carefully considered and Policy WLP2.14 requires that any future development should avoid impacts on it. The residential development brief also highlights that proposals to enhance this area should be considered an incorporated into any future proposals.	None.
Brian Sutton	Natural and Historic Environment – paragraph 3.12	Observation	These woods and meadows will be adversely affected by 150 houses, cars, pollution of the air, noise. All within 1km of the new build. It will spoil a relatively untouched and pristine area, where nature thrives. Orchids are in the woods along with bluebells, and a wide variety of birds, mammals.	The development framework within the residential development brief highlights a number of considerations that will protect wildlife and habitats and integrate them into the development, such as retaining existing trees and hedgerows and the incorporation of a green corridor. As stated in Policy WLP2.14 any planning application for this site will need to be supported by an ecological assessment to determine the existing ecological value of the site. Also, as stated on page 5, any planning application will need to meet the criteria set out in policy WLP8.34 Biodiversity and Geodiversity.	None.

Cycling UK (John Thompson)	Movement – paragraph 3.24	Observation	Is there the possibility of bus stops being located closer to the site?	Bus stops are located within a 5 minute walking distance from the site, with others being located within 10 minutes. However, the provision of the bus services are outside of the remit of the Council.	None.
John Rigby	Movement – paragraph 3.24	Observation	Error – states that Crestview Medical Centre is 0.5 miles to east and Aldi Grocery shop is 0.8 miles to west. Both locations are east and Aldi is closer than Crestview Medical Centre.	Comments noted. The locations and distances referenced in paragraph 3.24 have been checked and corrected where they were incorrect.	Locations and distances in paragraph 3.24 have been corrected where necessary.
Karma McLean	Movement – paragraphs 3.20 – 3.24	Observation	Closest bus stop is on Somerleyton Road, with only thin unsafe pathways leading to it. Roadway is also narrow, especially when trucks use it. Speed restrictions being monitored and speeding is common, Union Lane and Parkhill crossroads very dangerous, only be added to with additional 150 dwellings.	The Waveney Local Plan is supported by traffic modelling which evaluated the impact on the growth proposed in the Local Plan, including this site, on the highway network. No issues were found that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and have provided comments on the highway network which have been incorporated into the brief. Once a	None.

				detailed proposal has been created for this site there will be further consideration of any necessary highways measures that will be needed to make the access to the site safe.	
British Horse Society (Charlotte Ditchburn)	Movement – general comment	Observation	No objection to the application in principle but believes for this to be compliant with National and Local policies the proposed cycling and walking infrastructure throughout the site should be multi-user routes for all non-motorised users including equestrians. Evidence suggested a number of routes around the site are under recorded as footpaths and could reasonably subsist at bridleway status. Application for this likely to be submitted to Suffolk County Council in due course. This would adequately include equestrian access through the site. Support proposal to upgrade Flixton Footpath 6 for its entire length.	Comments noted. Paragraphs 4.18 – 4.20 highlight the importance of walking and cycling infrastructure and where this should be located to ensure the site is connected to the wider area. These sections also highlight, where considered appropriate, it should be explored if these links could be upgraded to bridleways. This should be discussed with Suffolk County Council, by the developer.	None.

George	Movement –	Observation	Imperative that cycling	Comments noted. Paragraphs 4.18	None.
Redpath	paragraph 3.22		infrastructure is incorporated	– 4.20 highlight the importance of	
			within and outside site, car must	walking and cycling infrastructure	
			not dominate. Surrounding cycling	and where this should be located	
			infrastructure is fragmented not	to ensure the site is connected to	
			allowing for easy access to town	the wider area. As a	
			centre. Note that text says cycling	Supplementary Planning	
			infrastructure SHOULD be	Document, the residential	
			incorporated, suggest that this is	development brief cannot change	
			changed to MUST. They must also	policy criteria or be contradictory	
			link up to schools and the town	to them, therefore the wording of	
			centre, not a token cycle lane on	'should' cannot be changed.	
			main road.		
Stephen Bould	Movement	Observation	All routes at B1375/Union	The Waveney Local Plan is	None.
			Lane/Oulton Road North	supported by traffic modelling	
			crossroads are narrow and	which evaluated the impact on the	
			dangerous, 150 homes will mean	growth proposed in the Local Plan,	
			300-400 people daily increase to	including this site, on the highway	
			flow. B1375 is narrow and ill-lit and	network. No issues were found	
			used as a 'rat-run' for those	that could not be mitigated against	
			avoiding A1117. The straight	that would mean development	
			nature of the road tempts drivers	could not place on this site. The	
			to speed and overtake with	Council has also worked in	
			completely inadequate provision	collaboration with Suffolk County	
			for pedestrians. In practice there	Council as the local highways'	
			will be limited pedestrian traffic	authority in the creation of this	
			and a lot of vehicular traffic. Safe	residential development brief and	
			provision of footways along	have provided comments on the	
			Parkhill onto development need to	highway network which have been	
			be made to encourage walking.	incorporated into the brief.	

			Beneficial to have a walkaway on western side of Parkhill extending to footpath just south of Spinney Farm, leading to The Pastures. Walkways should be developed in conjunction with cycle provision at both Parkhill and Union Lane, as well as improvements to Oulton Street and Oulton Road North. Local facilities are not 'near' and require long journeys on foot or by car on narrow roads.	Paragraphs 4.18 – 4.20 highlight the importance of walking and cycling infrastructure and where this should be located to ensure the site is connected to the wider area, including connections on Union Lane and Parkhill. Some services are shown to be within a 10-minute walking distance from the site. Developing the pedestrian and cycle connections will further encourage walking and cycling which could extend to areas beyond these.	
Brian Sutton	Movement – paragraphs 3.21 – 3.24	Observation	These paragraphs show the real isolation of this "island" of proposed housing. This is looking a community on the edge of so many facilities, and not likely to improve the wellbeing of inhabitants, especially more elderly.	Some services are shown to be within a 10-minute walking distance from the site. Bus stops, which could be sued to reach services beyond this, are located within a 5 minute walking distance from the site, with others being located within 10 minutes. The development of walking and cycling infrastructure will help encourage healthy lifestyles. Any development on this site will be required to meet the criteria of policy WLP8.31 Lifetime Design which includes requirements for designing developments	None.

				considering those with illnesses such as dementia.	
Roger Hillier	Creating a Built Form – paragraph 4.5	Observation	Development along the whole of the southern edge of the site should be kept back from the existing housing due the fact that they have very small gardens and they would have their privacy invaded, bearing in mind that they have not been overlooked in the last thirty five years.	Paragraph 4.5 of the residential development brief states that development should be appropriately set back from the dwellings along the southern edge of the site and existing vegetation should be retained where possible.	None.
Stephen Bould	Creating a Built Form – general comment	Observation	Envisage 150 homes with one single access onto Parkhill, do not believe this issue has been properly tackled. Roundabout or traffic lights might help, but long- term better solution would be to abandon provision of a major north/south cut through and cut the road in two between Spinney Farm and the Parkhill Hotel, while at the same time providing two access routes - one via Union Lane and the existing crossroads, and another off Parkhill's southern stretch.	The Waveney Local Plan is supported by traffic modelling which evaluated the impact on the growth proposed in the Local Plan, including this site, on the highway network. No issues were found that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and have provided comments on the	None.

				highway network which have been incorporated into the brief. Once a detailed proposal has been created for this site there will be further consideration of any necessary highways measures that will be needed to make the access to the site safe.	
Karma McLean	Landscape and Heritage Integration – paragraphs 4.9 – 4.17	Observation	Development will cause extinction of species that live in this area. Pheasants, owls, foxes, muntjac, bats and more living in this area. Not enough land has been left for natural environment.	The development framework within the residential development brief highlights a number of considerations that will protect wildlife and habitats and integrate them into the development, such as retaining existing trees and hedgerows and the incorporation of a green corridor. As stated in Policy WLP2.14 any planning application for this site will need to be supported by an ecological assessment to determine the existing ecological value of the site. Also, as stated on page 5, any planning application will need to meet the criteria set out in policy WLP8.34 Biodiversity and Geodiversity.	None.

Roger Hillier	Landscape and	Observation	When Lothingland was being	The development framework	None.
	Heritage		developed a ditch was built and	within the residential development	
	Integration –		subsequently a large oak tree fell in	brief highlights a number of	
	general		high winds, narrowly missing	considerations that will protect	
	comment and		closest house. All the hedging and	wildlife and habitats and integrate	
	paragraphs 4.9		trees need to be retained for the	them into the development, such	
	– 4.13		sake of the wildlife and the	as retaining existing trees and	
	- 4.15		aesthetic appearance, we cannot	hedgerows and the incorporation	
			let this disappear.	of a green corridor. As stated on	
				page 5, any planning application	
				will need to meet the criteria set	
				out in policy WLP8.34 Biodiversity	
				and Geodiversity. Paragraph 4.9 of	
				the residential development brief	
				states that freestanding trees	
				should be retained and enhanced.	
Stephen Bould	Landscape and	Observation	The site includes the burial ground		None.
Stephen Bould	Heritage	Observation	of the old workhouse. I draw your	The historic burial ground has been carefully considered and Policy	None.
	Integration –		attention to pp. 174-179 of	WLP2.14 requires that any future	
	-		Newsom's authoritative Faculty	development should avoid impacts	
	general comment and		Jurisdiction of the Church of	on it. The residential development	
			England (especially paragraph 3 on	brief also highlights that proposals	
	paragraph 4.16		p. 176), and to Sections 7 and 8 of	to enhance this area should be	
			the Faculty Jurisdiction Measure		
				considered an incorporated into	
			1964, on p. 198 of the same book.	any future proposals. The exact	
				nature of these enhancements will	
				be established at the time a	
				planning application is submitted	
				or during pre-application	
				discussions.	

Suffolk County Council – Growth, Highways and Infrastructure (Cameron Clow)	Landscape and Heritage Integration – paragraph 4.17	Observation	Welcome reference to burial ground. Requirement for geophysical surveys could be included in paragraph 1.7. SCC would recommend a commemoration of the burial site included with any open space, which could be added to paragraph 4.17.	Comments noted. The residential development brief and policy WLP2.14 both state that development on the site should enhance the burial ground. The nature of this enhancement will be determined at the planning application stage.	None.
David Henwood	Streets and Movement – general comment	Objection	Strongly object to cycle and pedestrian access to Union Lane as it is too narrow with no room for pathways, used by cars and lorries all day and any walkers need to mount hedges to stay out of the way. Will only lead to accidents if connected.	The residential development brief states that cycling and walking connections should be made onto Union Lane. This means that these connections should only be delivered if they are viable and acceptable to Suffolk County Council as the highways authority. Issues that have bene raised in this comment will be considered as part of deciding if proposals are acceptable.	None.
Cycling UK (John Thompson)	Streets and Movement – paragraphs 4.18 – 4.21	Observation	I would appreciate being advised of what precisely is proposed for the cycling facilities once it becomes clearer.	The full details of the cycling connections will be available when a planning application is received.	None.

Oulton Parish Council (Tony Knights)	Streets and Movement – paragraph 4.21	Observation	Extremely concerned over vehicular entrance from Parkhill. Latest data speed indicator device shows between 28 th February 2021 and 28 th March 2021 shows 111,085 vehicles travelled southbound, average of 3897 per day. 75% over speed limits with speeds of up to 80mph. Parkhill is single lane in both directions with no pavement, 2 listed buildings and residential properties, and is an unrestricted lorry route. Development would mirror Union Lane which is a dangerous junction. Accidents have happened at the junction and along residential properties, but not all reported.	The Waveney Local Plan is supported by traffic modelling which evaluated the impact on the growth proposed in the Local Plan, including this site, on the highway network. No issues were found that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and have provided comments on the highway network which have been incorporated into the brief. Once a detailed proposal has been created for this site there will be further consideration of any necessary highways measures that will be needed to make the access and highways network within and	None.
				highways network within and around the site safe.	
A Bodmer	Streets and Movement – general comment		Not opposed to development however very concerned about road access. Parkhill is a very busy road with no footpaths or streetlights. Notorious accident	The Waveney Local Plan is supported by traffic modelling which evaluated the impact on the growth proposed in the Local Plan, including this site, on the highway network. No issues were found	None.

Beccles and Bungay Cycle Strategy (Ian Reid)	Streets and Movement – paragraph 4.20	Observation	black spot and more traffic will only make this worse Parkhill has no provision for walking or cycling. It is a narrow, busy lane with no pavement or segregated cycle way. Unless this changes then pedestrians and cyclist should be connected to Gorleston Road, Hall Way or Millennium Way.	that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and have provided comments on the highway network which have been incorporated into the brief. The final form of the access to the site will be determined during the planning application process. The Waveney Local Plan is supported by traffic modelling which evaluated the impact on the growth proposed in the Local Plan, including this site, on the highway network. No issues were found that could not be mitigated against that would mean development could not place on this site, either on Parkhill or elsewhere. The	None.
			cyclist should be connected to Gorleston Road, Hall Way or	network. No issues were found that could not be mitigated against that would mean development could not place on this site, either	
				Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and have provided comments on the	

Karma McLean	Streets and	Observation	The problem with pedestrian and	highway network which have been incorporated into the brief. The residential development brief highlights a number of pedestrian and cycle connections that should be explored, however this does not preclude other links being explored. The residential development brief	None.
	Movement – paragraphs 4.18 – 4.21		cycle connection to Union Lane is that they need to come out onto Parkhill or Flixton road, neither of which are safe. Union Lane pathways are thin as is the roadway. Speed restrictions being monitored and speeding is common, Union Lane and Parkhill crossroads very dangerous, only be added to with additional 150 dwellings.	highlights a number of pedestrian and cycle connections that should be explored, however this does not preclude other links being explored. Traffic modelling did not identify any issues that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and have provided comments on the highway network which have been incorporated into the brief. Once a detailed proposal has been created for this site there will be further consideration of any necessary highways measures that	
				will be needed to make the access to the site safe.	
---------------------------------------	---	-------------	---	--	-------
Sport England (Philip Raiswell)	Streets and Movement – general comment	Support	Sport England support development of footpaths and the need to link them to existing network. Would like to see development to reflect the principles of 'Active Design' guidance, which seeks to establish new opportunities for sport and physical activity in new and existing development. Would recommend reference to this in supporting text.	Comments noted. The residential development brief looks to promote the principles of 'Active Design' and active lifestyles in general through the provision of walking and cycling connections as well as well integrated and useable open space.	None.
Gary Edwards	Streets and Movement – paragraph 4.19	Observation	Will these footpaths to Union Lane be well lit and who will maintain?	The exact nature of the links to Union Lane will be established at the time of a planning application. They will need to meet the requirements of Suffolk County Council as the highways authority.	None.

Gary Edwards	Streets and Movement – paragraphs 4.19 and 4.21	Observation	Will these footpaths to union lane be well lit and who will maintain? Junction onto Parkhill is already busy. Concern over additional vehicles which will cause accidents. Emergency vehicles will struggle to get through given width of Parkhill. Additional traffic will only make issues when railway barriers are raised at Oulton Broad North and South stations.	The exact nature of the links to Union Lane will be established at the time of a planning application. They will need to meet the requirements of Suffolk County Council as the highways authority. Traffic modelling did not identify any issues that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and have provided comments on the highway network which have been incorporated into the brief.	None.
Roger Hillier	Streets and Movement – general comment	Observation	Exiting B1375 is often difficult due to speeding traffic. How are you going to stop speeding? Any more traffic will make this more difficult and same problems will occur at new junctions.	The Waveney Local Plan is supported by traffic modelling which evaluated the impact on the growth proposed in the Local Plan, including this site, on the highway network. No issues were found that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County	None.

				Council as the local highways' authority in the creation of this residential development brief and have provided comments on the highway network which have been incorporated into the brief.	
Philip Monument	Streets and Movement – general comment	Observation	B1375 used as a rat-run, speeding and density of traffic at peak times is horrendous. Cannot cross at Union Lane crossroads. New development will only make this worse. Must considered closing off access to A47 from Oulton village using B1375 to force traffic to use bypass instead.	Traffic modelling did not highlight any issues that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with Suffolk County Council as the local highways' authority in the creation of this residential development brief and have provided comments on the highway network which have been incorporated into the brief.	None.
Oulton Ben	Streets and Movement – general comment and paragraph 4.21	Observation	Generally a good choice of site, the proposal is supported. However, paragraph 4.21 gives rise to come concern. B1375 is a busy through road particularly at rush hour. 20mph speed limits and difficult roundabout south outside Old Frank Public House. Frequented by large articulated vehicles. Blind crest outside Parkhill. New residents will probably want to	Comments noted. The Waveney Local Plan is supported by traffic modelling which evaluated the impact on the growth proposed in the Local Plan, including this site, on the highway network. No issues were found that could not be mitigated against that would mean development could not place on this site. The Council has also worked in collaboration with	None.

			access Tesco, possible road layout improvements to mitigate blind crest and perhaps allied access through Park Meadows onto the A1117 roundabout may be useful consideration.	Suffolk County Council as the local highways' authority in the creation of this residential development brief and have provided comments on the highway network which have been incorporated into the brief. Once a detailed proposal has been created for this site there will be further consideration of any necessary highways measures that will be needed to make the access to the site safe.	
Stephen Bould	Streets and Movement – paragraphs 4.19 and 4.20	Observation	The recognition in this part of the plan of the need for the construction, inter-connection, and protection of footpaths is laudable. Refer back to what I wrote in response under the general heading "Movement," and at the top of this section under "Creating a Built Form."	Comments noted.	None.
Brian Sutton	Streets and Movement – paragraph 4.18	Observation	Union Lane is a narrow, congested road in places where extra foot & cycle use is very difficult. What happens when the cycles and people come out on the Oulton St. Junction? It is already very dangerous spot with heavy traffic at times.	The exact nature of the links to Union Lane will be established at the time of a planning application. They will need to meet the requirements of Suffolk County Council as the highways authority.	None.

Brian Sutton	Streets and	Observation	Junction for access is one of	The Waveney Local Plan is	None.
	Movement –		biggest weaknesses. B1375 is a	supported by traffic modelling	
	paragraphs		narrow highway where cars	which evaluated the impact on the	
	4.20 and 4.21		regularly speed. How will cars turn	growth proposed in the Local Plan,	
			south safely? Bad record for	including this site, on the highway	
			serious accidents and dangerous	network. No issues were found	
			for additional 150 dwellings.	that could not be mitigated against	
			Thought about the movement of	that would mean development	
			children on foot or bikes for	could not place on this site. The	
			Benjamin Britten School? At risk	Council has also worked in	
			coming out of Union Lane and	collaboration with Suffolk County	
			heading down Oulton Road North,	Council as the local highways'	
			road is heavily parked up and	authority in the creation of this	
			narrow.	residential development brief and	
				have provided comments on the	
				highway network which have been	
				incorporated into the brief. Once a	
				detailed proposal has been created	
				for this site there will be further	
				consideration of any necessary	
				highways measures that will be	
				needed to make the access to the	
				site safe.	
Mr Holland	Development	Observation	We have enough new housing	The Council worked in	None.
	Framework		being built. Local healthcare	collaboration with infrastructure	
	Мар		already struggling and difficult to	and service providers during the	
			get appointments at Crestview.	creation of the Waveney Local Plan	
			Why must we build on every bit of	to establish any infrastructure	
			Green Space? If this goes ahead	needs that would be required to	
				support the site. The Council also	

may as well merge Lowestoft with	maintains regular contact with
Great Yarmouth.	infrastructure providers, including
	during the creation of the
	residential development brief, to
	ensure that new development is
	supported by the infrastructure
	that it requires. Any needs
	highlighted by these providers for
	them to be able to provide the
	necessary services have been
	incorporated into the residential
	development brief. The local
	Clinical Commissioning Group, as
	the local healthcare provider, at
	the time of drafting the brief did
	not identify any infrastructure
	needs to support development on
	this site. The principle of
	development on this site was
	established through the creation of
	the Local Plan, which is supported
	by an extensive evidence base and
	was subject to multiple periods of
	public consultation, as well as a
	public examination.
	public chamilation.

Christine Boar	Development	Objection	Have to object. Other areas in	The Council does not have the	None.
	Framework		Lowestoft should be built first. Do	remit to control when a planning	
	Мар		not need more traffic or pollution.	application is submitted for a site.	
			Development would bring in 300-	The Council must also meet its	
			450 extra vehicles. Trees should	requirements to deliver a 5 Year	
			have a preservation order on them.	Housing Land Supply, therefore the	
			Graves at workhouse should be	development of greenfield sites, if	
			untouched. Dentists and doctors	they come forward first, cannot be	
			are overloaded. Gresham Avenue	held off until brownfield sites are	
			post office hasn't got parking	developed. Traffic modelling did	
			facilities for more people. Woods	not identify any issues that could	
			Loke Primary school is full.	not be mitigated against that	
				would mean development could	
				not place on this site. The Council	
				has also worked in collaboration	
				with Suffolk County Council as the	
				local highways' authority in the	
				creation of this residential	
				development brief and have	
				provided comments on the	
				highway network which have been	
				incorporated into the brief.	
				Paragraph 4.9 of the residential	
				development brief states that	
				freestanding trees should be	
				retained and enhanced. The	
				historic burial ground has been	
				carefully considered and Policy	
				WLP2.14 requires that any future	
				development should avoid impacts	

on it. The residential development brief also highlights that proposals to enhance this area should be considered an incorporated into any future proposals. The Council worked in collaboration with infrastructure and service providers during the creation of
to enhance this area should be considered an incorporated into any future proposals. The Council worked in collaboration with infrastructure and service providers during the creation of
Image: state of the state
any future proposals. The Council worked in collaboration with infrastructure and service providers during the creation of
worked in collaboration with infrastructure and service providers during the creation of
infrastructure and service providers during the creation of
providers during the creation of
the Waveney Local Plan to
establish any infrastructure needs
that would be required to support
the site. The Council also maintains
regular contact with infrastructure
providers, including during the
creation of the residential
development brief, to ensure that
new development is supported by
the infrastructure that it requires.
Any needs highlighted by these
providers for them to be able to
provide the necessary services
have been incorporated into the
residential development brief,
which includes the potential need
for a pre-school. The local Clinical
Commissioning Group, as the local
healthcare provider, at the time of
drafting the brief did not identify
any infrastructure needs to support
development on this site.

Oldman	Development	Observation	No comments on section 1,2,3 and	Comments noted. The Council	Paragraph 4.2
Homes	Framework		4. Objectives of Development	worked in collaboration with	has been
	Мар		Framework are generally	Suffolk County Council, as the local	reworded to
			supported, however whilst	highways authority, during the	make clear the
			indicative gives rise to a number of	creation of the residential	Councils aims
			issues. Access to the site is	development brief. The County	for access to
			restricted to a fixed location to	Council provided comments which	and through
			ensure adequate visibility splays.	were incorporated into the draft	the site.
			Due to this fixed access point, it is	brief. No reference was made	
			not possible to provide a linear	regarding the access to the site	
			road without resulting in the	having to come from a fixed point.	
			removal of trees on site, which is	No objection was raised by the	
			contrary to paragraph 4.9 and	County Council is exploring the	
			could undermine the wildlife	potential of developing a linear	
			corridor (paragraph 4.11). Suffolk	road. Paragraph 4.2 of the	
			County Council Highways would be	residential development brief,	
			unlikely to support a linear road	which refers to the main access to	
			given that the design would	the site being linear and tree lined,	
			encourage speeding and advise	ahs been reworded to provide	
			that minor bends are required. It	further clarity on East Suffolk	
			would not be possible to	Councils aims for this element of	
			incorporate trees closer than 2m	the site.	
			from the adopted highways,		
			meaning the width of the road		
			including pavements and filter		
			drains could potentially be around		
			20.5m, resulting in a reduction of		
			the developable area of		
			approximately 0.5ha and could		
			result in the loss of existing trees.		

Consider that it is possible to
prepare a layout which delivers an
access road that is generally linear
and which retains views as
per the aspirations of the
Development Brief, but crucially is
capable of adoption by Suffolk
County Council Highways
therefore will require traffic
calming bends. In addition, a
detailed landscaping scheme can
be brought forward which gives
the appearance of a tree lined road
which, where possible, retains
existing trees and does not reduce
the area of the site that can be
developed.

Equality Impact Assessments Screening Opinion

WLP2.14 Land North of Union Lane, Oulton Residential Development Brief

August 2021



Introduction

- 1. It is the Council's duty under the Equality Act 2010 to undertake an Equality Impact Analysis at the time of formulating a decision, drafting a report, designing or amending a policy. This will ensure that the Council is considering and taking positive action where possible to promote access to services for all their communities, including their wider communities. The Equality Impact Assessment Screening Assessment will assess whether there is any impact upon any of the groups with protected characteristics under the Equalities Act, which are listed in the table below. If an adverse impact upon any of these groups is identified then a full Equalities Impact Assessment will be required.
- 2. This residential development brief seeks to provide information and guidance about the development of site WLP2.14 (Land North of Union Lane, Oulton) in north Lowestoft. The residential development brief document is divided into a number of separate sections. The first three sections (Understanding the Place, Natural and Historic Environment and Movement) come under Development Considerations and focus on what currently exists around and on the site. The following three sections (Creating a Built Form, Landscape and Heritage Integration and Streets and Movement) come under the Development Framework and outline design principles that will be expected to be met in a planning application. These principles have also been mapped on Figure 5 of the document.
- 3. 'Understanding the Place' provides contextual information about the site. This section includes the current and former uses of the site and its connectivity to the nearby road network, as well as infrastructure on the site. It details the current buildings surrounding the site, as well as the heights of buildings on surrounding land and their current uses. It also references the accompanying map, which shows key views from the site.
- 4. 'Natural and Historic Environment' identifies wildlife sites, historic buildings and archaeological considerations on the site and in the surrounding area. It also draws attention to issues with ground contamination and the water table.
- 5. 'Movement' details the cycle routes and footpaths that could connect to this site, as well as explaining how it is related to key shops and services.
- 6. 'Creating a Built Form' details the requirements for future development on the site. This includes the street layout as well as the types of building frontages that will be needed. It also provides guidance about the potential need for an early years setting and the requirements for play space and open space.

- 7. 'Landscape and Heritage Integration' specifies the protection of existing trees and biodiversity on the site as well as the creation of a wildlife corridor and native planting. It also provides guidance about the provision of drainage on the site, including a SUDs scheme, as well as requirements for archaeological investigation and protection of a prehistoric burial site.
- 8. 'Streets and Movement' sets out the requirements for cyclist and pedestrian connectivity across the site. It also states the need for further discussion with Suffolk County Council highway authority about the junction with Parkhill.
- 9. The Equality Act 2010 lists nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. East Suffolk Council has added a tenth characteristic, socio-economic deprivation, in addition to the nine protected characteristics listed in the legislation. This reflects that pockets of deprivation that exist across East Suffolk.

	Groups	Likely Impact	Reason for your decision
		(positive/negative/no	
		impact)	
а	Age (Includes	Positive	The residential development brief
	safeguarding issues)		makes provision for a potential pre-
			school setting in accordance with
			policy WLP2.14. This will benefit
			families with young children if it is
			considered to be needed. Housing
			development on this site must
			meet the requirements of Local
			Plan policy WLP8.31 (Lifetime
			Design), which states that 40% of
			dwellings should meet requirement
			M4(2) of part M of the building
			regulations for accessible and

Screening of impact on different groups

			adaptable dwellings. This will
			benefit older people.
b	Disability	Positive	Housing development on this site
	,		must meet the requirements of
			Local Plan policy WLP8.31 (Lifetime
			Design), which states that 40% of
			dwellings should meet requirement
			M4(2) of part M of the building
			regulations for accessible and
			adaptable dwellings. This will
			benefit people with a disability.
С	Gender reassignment	No impact.	This residential development brief
			seeks to guide housing
			development on site allocation
			WLP2.14 (Land North of Union
			Lane). As such it will have no
			impact upon people who have
			undergone gender reassignment.
D	Marriage and Civil	No impact.	This residential development brief
	Partnership		seeks to guide housing
			development on site allocation
			WLP2.14 (Land North of Union
			Lane). As such it will have no
			impact upon people who are
			married or in a civil partnership.
Е	Pregnancy and	No impact.	This residential development brief
	maternity		seeks to guide housing
			development on site allocation
			WLP2.14 (Land North of Union
			Lane). As such it will have no
			impact upon people who are
			pregnant or on maternity leave.
F	Race	No impact.	This residential development brief
			seeks to guide housing
			development on site allocation
			WLP2.14 (Land North of Union
			Lane). As such it will have no

			impact upon people of any racial or
			ethnic group.
G	Religion or Belief	No impact.	This residential development brief
			seeks to guide housing
			development on site allocation
			WLP2.14 (Land North of Union
			Lane). As such it will have no
			impact upon people any religion or
			belief.
Н	Sex	No impact.	This residential development brief
			seeks to guide housing
			development on site allocation
			WLP2.14 (Land North of Union
			Lane). As such it will have no
			impact upon people any sexual
			identity.
I	Sexual orientation	No impact.	This residential development brief
			seeks to guide housing
			development on site allocation
			WLP2.14 (Land North of Union
			Lane). As such it will have no
			impact upon people of any sexual
			orientation.
J	Socio-economic	Positive.	Local Plan policy WLP8.2
	deprivation		(Affordable Housing) requires
			housing developments of greater
			than 11 dwellings to include 20%
			affordable housing. This will benefit
			those who are experiencing social
1			or economic deprivation.

Consultation and Engagement

There has been consultation during the preparation of the residential development briefs, which includes the residential development brief for WLP2.14. An initial informal consultation on a draft template for the residential development briefs took place

between 5th June 2020 and 24th July 2020, which was intended to scope the contents and format of the residential development briefs. This included members of the public, developers, landowners, infrastructure providers and statutory consultees.

During the preparation of the residential development briefs there have also been internal consultations with colleagues from within the Council, including development management, ecology, landscape and design and conservation. There has also been ongoing consultation with Suffolk County Council Highway Authority.

The draft development brief for site WLP2.14 was also subject to a full public consultation, which took place between 5th May 2021 and 23rd June 2021. This provided the opportunity for members of the public and any statutory or non-statutory organisation to provide comments about the draft development brief. These comments were then used to inform the preparation of the finished development brief.

The consultation was initially scheduled to end on the 21st June. However, a technical error on the 21st June meant that comments could not be submitted on that day, therefore the consultation was extended to the 23rd June to mitigate this.

In response to the restrictions related to the Covid-19 pandemic, physical copies were made available and posted out where possible (free of charge) on request for those that were not able to view the relevant document and/or supporting documents online.

The planning policy team was operating under a voicemail service during the Covid pandemic. Callers were asked to leave a message including their contact details and their call was returned as soon as possible.

The provisions were subject to review in relation to the practicality and possibility for documents to be made available in the Council's Customer Service Centres and in libraries for public inspection, subject to changes to national restrictions.

Presentation in Different Languages

As part of the formal consultation, the document was published on the Council's website, with hard copies available on request for those unable to access it online. The document could be requested in a different language. When such requests are received the Customer Services Team were involved with ensuring this request was actioned.

Proposed Changes

The Council analysed responses received during the public consultation and made any necessary changes as a result of comments received.

Conclusion

No negative impact upon any group with protected characteristics or experiencing socioeconomic deprivation was identified and therefore a full Equality Impact Assessment is not required. The Equality Impact Assessment Screening Exercise was revisited in the light of formal consultation responses and subsequent changes to the development brief. However, it was not considered that the changes to the development brief in any way altered the conclusions of the original screening exercise. Therefore, a full Equality Impact Assessment is not required.

Agenda Item 11 ES/0868



Strategic Environmental Assessment Screening Opinion

Residential Development Brief WLP2.14 – Land North of Union Lane, Oulton

July 2021

Contents

1.	Introduction	. 1
2.	Legislative Background	. 1
3.	Criteria for determining the likely significance of effects	. 2
4.	Assessment	. 3
5.	Conclusion	. 7
Арр	endix 1: Responses from Statutory Consultees	. 8

1. Introduction

In some circumstances a planning document could have significant environmental effects and may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 and so require Strategic Environmental Assessment.

This screening report is designed to test whether or not the contents of the WLP2.14 – Land North of Union Lane, Oulton, Residential Development Brief requires a full Strategic Environmental Assessment (SEA). The legislative background below outlines the regulations that require the use of this screening exercise. Section 4 provides a screening assessment of the likely significant effects of the development brief and the need for a full SEA.

2. Legislative Background

The basis for Strategic Environmental Assessment legislation is European Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the Environment'. This document is also known as the Strategic Environmental Assessment (or SEA) Directive. European Directive 2001/42/EC was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended, including through EU Exit legislation).

The SEA Regulations include a definition of 'plans and programmes' to which the regulations apply. SEA requirements relate to plans or programmes which are subject to preparation or adoption by an authority at national, regional or local level, which includes those prepared for town and country planning and land use. SEA is required where the plan or programme is likely to have significant environmental effects. It is therefore necessary to screen the WLP2.14 – Land North of Union Lane, Oulton, Residential Development Brief to identify whether significant environmental effects are likely. Where screening identifies significant environmental effects, a full Strategic Environmental Assessment is required.

Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC

The preparation of the WLP2.14 – Land North of Union Lane, Oulton, Residential Development Brief triggers a requirement to determine whether it is likely to have a significant environmental effect. This requirement is discharged by the 'responsible authority' being the authority by which or on whose behalf the plan is prepared. Before making a determination, the responsible authority shall: -

- a) Take into account the criteria specified in Schedule 1 to the Regulations; and
- b) Consult the consultation bodies.

The consultation bodies are defined in section 4 of the SEA Regulations. The opinions from the statutory consultation bodies: Historic England, the Environment Agency and Natural England, are therefore to be taken into account.

Schedule 1 of the SEA Regulations sets out the criteria for determining likely significant effects as follows:

- The characteristics of plans and programmes, having regards, in particular to:
 - a. The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.
 - b. The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.
 - c. The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.
 - d. Environmental problems relevant to the plan or programme.
 - e. The relevance of the plan or programme for the implementation of community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).

- 2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:
 - a. The probability, duration, frequency and reversibility of the effects.
 - b. The cumulative nature of the effects.
 - c. The trans boundary nature of the effects.
 - d. The risks to human health or the environment (e.g. due to accidents).
 - e. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
 - f. the value and vulnerability of the area likely to be affected due to:
 - i. special natural characteristics or cultural heritage;
 - ii. exceeded environmental quality standards or limit values;
 - iii. intensive land-use; and
 - g. the effects on areas or landscapes which have a recognised national, community or international protection status.

4. Assessment

The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required.



Source: A Practical Guide to the Strategic Environmental Assessment Directive (2005)

The following assessment applies the questions from the preceding diagram. The answers determine whether the WLP2.14 – Land North of Union Lane, Oulton, Residential Development Brief will require a full Strategic Environmental Assessment.

1. Is the PP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))

Yes. The preparation and adoption of the WLP2.14 – Land North of Union Lane, Oulton, Residential Development Brief has been carried out by East Suffolk Council. The WLP2.14 – Land North of Union Lane, Oulton, Residential Development Brief has been produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))

Yes. The production of the WLP2.14 – Land North of Union Lane, Oulton, Residential Development Brief forms part of the delivery of the statutory Development Plan and the process for preparing SPDs is set out in the Town and Country Planning (Local Development) (England) Regulations 2012 and relates to the administration of the Council's planning service.

3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))

Yes. The WLP2.14 – Land North of Union Lane, Oulton, Residential Development Brief has been prepared in support of the delivery town and country planning and land use policies.

The guidance contained in the WLP2.14 – Land North of Union Lane, Oulton, Residential Development Brief provides a framework for the implementation of policy WLP2.14 of the East Suffolk Council- Waveney Local Plan (March 2019). The Waveney Local Plan was subject to full Sustainability Appraisal incorporating the requirements for Strategic Environmental Assessment during it production.

The WLP2.14 – Land North of Union Lane, Oulton, Residential Development Brief does not set a framework for the future consent of projects listed in Annexes I and II of the EIA Directive.

4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))

A separate screening exercise has been carried out under the Habitats Directive (92/43/EEC) and Conservation of Habitats and Species Regulations (2017) (as amended). This determined that a full Appropriate Assessment was required in respect of likely significant effects arising from increased recreational disturbance. Appropriate mitigation measures were identified through the Appropriate Assessment.

5. Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)

Not applicable (based on the responses to questions 3 and 4 above).

6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3(4))

Yes. The WLP2.14 – Land North of Union Lane, Oulton, Residential Development Brief will be a material consideration in the determination of planning applications, and will be applied alongside the policy framework provided by the Local Plan.

7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)

No. Not applicable.

8. Is it likely to have a significant effect on the environment? (Art. 3(5))

No. The guidance contained in the WLP2.14 – Land North of Union Lane, Oulton, Residential Development Brief provides a framework for the implementation of policy WLP2.14 of the East Suffolk Council- Waveney Local Plan (March 2019). The Waveney Local Plan was subject to full Sustainability Appraisal incorporating the requirements for Strategic Environmental Assessment during it production.

The Local Plan site allocation policy (WLP2.14) identified potential for some parts of the site provide suitable habitats for a number of species and the policy includes criteria requiring ecological assessment to be undertaken as part of any planning application. This requirement is highlighted in the development brief and will need

6

to be addressed as part of any future planning application. The development brief also includes reference to a number of other environmental considerations that will need to be taken account of as part of any future planning application.

5. Conclusion

The WLP2.14 – Land North of Union Lane, Oulton, Residential Development Brief provides a framework for the implementation of site allocation policies in two Local Plans for East Suffolk. Both Local Plan were subject to Sustainability Appraisal including Strategic Environmental Assessment.

It is considered by East Suffolk Council that it is not necessary for a Strategic Environmental Assessment to be undertaken of the WLP2.14 – Land North of Union Lane, Oulton, Residential Development Brief to ensure compliance with SEA legislation.

The draft Screening Opinion was published for consultation alongside the draft development brief. The responses of the consultation bodies are contained in Appendix 1.

Signed:

D. Reed

Dated: 8th July 2021

Desi Reed Planning Policy and Delivery Manager East Suffolk Council

Appendix 1: Responses from Statutory Consultees

Environment Agency

Good Morning

Thank you for your consultation. I can confirm that we have read the draft development brief and have no comments to make. There are no constraints within our remit. We note the comments in relation to ground contamination and would echo that the necessary ground investigations are completed.

Kind Regards

Liam

Liam Robson

Sustainable Places Planning Advisor – East Anglia Area (East) **Environment Agency** | Iceni House, Cobham Road, Ipswich, Suffolk, IP3 9JD Please be aware that due to COVID-19 – any post will not be picked up. Please direct all correspondence electronically.

Historic England



Mr Ben Wright East Suffolk Council Riverside 4 Canning Road Lowestoft Suffolk NR33 0EQ Direct Dial: 01223 582751

Our ref: PL00749364

21 June 2021

Dear Mr Wright

Land North of Union Lane, Oulton Broad, Suffolk

Thank you for your letter regarding the above Strategic Environmental Assessment. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Yours sincerely,

Lynette Fawkes Inspector of Historic Building and Areas lynette.fawkes@historicengland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU Telephone 01223 582749 HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). A ny Information held by the organisation can be requested for release under this legislation.

Natural England- Full response to draft development brief

Date: 23 June 2021 Our ref: 352582 Your ref:

planningpolicy@eastsuffolk.gov.uk

BY EMAIL ONLY



Customer Services Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ

T 0300 060 3900

Planning consultation: Residential Development Brief for WLP2.14, 150 homes. Location: Land north of Union Lane, Oulton

Thank you for your consultation on the above dated 10 May 2021 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED

We consider that without appropriate mitigation a development in this location would:

- have an adverse effect on the integrity of the following European sites:
 - Benacre to Easton Bavents Lagoons Special Area of Conservation (SAC)
 - Benacre to Easton Bavents Special Protection Area (SPA)
- damage or destroy the interest features for which Pakefield to Easton Bavents SSSI Site of Special Scientific Interest has been notified.

In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures are required / or the following mitigation options should be secured:

- We advise that an upfront financial contribution of £321.22 per dwelling should be secured to contribute to the emerging Suffolk Recreational Disturbance Avoidance and Mitigation Strategy ('RAMS'), to mitigate the recreational disturbance impacts to designated sites by this development.
- As this development is within the RAMS 13km zone of influence and is for 50+ units, we
 advise that the development brief should include the provision of well-designed open
 space/green infrastructure (GI) that is proportionate to its scale to minimise any predicted
 increase in recreational pressure to designated sites, by containing the majority of
 recreation within and around the development site boundary. Please refer to Annex I
 which details the minimum provisions that on-site open space/GI, should include.

We advise that an appropriate obligation is attached to the development brief to secure these measures.

Page 1 of 9

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

Habitats Regulations Assessment

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the proposal in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any planning permission given. We advise that the mitigation requirements are clearly labelled within the development brief to ensure that developer expectations are appropriately aligned with the mitigation measures identified by the Appropriate Assessment.

Further advice on mitigation

It has been identified that this development falls within the 'Zone of Influence' (ZoI) for one or more of the European designated sites scoped into the Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy ('RAMS'). It is anticipated that new residential development (including new tourist accommodation) in this area is 'likely to have a significant effect' on the sensitive interest features of these European designated sites, through increased recreational pressure when considered either alone or 'in combination' with other plans and projects.

The RAMS has been put in place to ensure that the additional recreational pressure due to increasing levels of housing across the county is not likely to lead to an adverse effect on European designated sites on the Suffolk coast. The strategy allows mitigation to be dealt with on a strategic level, so that the relevant councils, Natural England and relevant stakeholders are able to work together to provide the best outcomes for the designated sites. It also has the benefit of streamlining the process, so reducing the amount of time taken to process individual residential planning applications for the councils and Natural England.

Natural England worked collaboratively with all the relevant councils to set up the strategy. We fully support the aims of the strategy; in our view it is the best way to provide appropriate avoidance and mitigation or measures for the European sites in question. As such, we advise that a suitable contribution to the Suffolk Coast RAMS should be sought from this residential development to ensure that the delivery of the RAMS remains viable. If this does not occur then the per house tariff in the adopted RAMS will need to be increased to ensure the RAMS is adequately funded. We therefore advise that you should not grant permission for any related application until such time as the implementation of this measure has been secured.

Furthermore, it is considered that for larger residential developments (50 units +, or equivalent, as a guide) within the 13 km Suffolk Coast RAMS zone of influence, or some smaller residential developments that are in very close proximity (200m or less) to designated sites are not able to fully mitigate the adverse impacts on European designated sites with a RAMS payment alone. Natural England recommends therefore that these developments include the provision of well-designed open space/green infrastructure (GI) that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the development site boundary.

Please refer to Annex I which details the minimum provisions that on-site open space/GI, should include.

Page 2 of 9

Site of Special Scientific Interest (SSSI)

Providing appropriate mitigation is secured to avoid impacts upon the European site(s) occurring there should be no additional impacts upon the SSSI interest features.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Other advice

In addition, Natural England would advise on the following issues.

Protected Landscapes

The proposed development is for a site within or close to a nationally designated landscape namely The Broads National Park. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

Your decision should be guided by paragraph 172 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 172 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.

The landscape advisor/planner for the National Park will be best placed to provide you with detailed advice about this development proposal. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the park's management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

The statutory purposes of the National Park are to conserve and enhance the natural beauty, wildlife and cultural heritage of the park; and to promote opportunities for the understanding and enjoyment of the special qualities of the park by the public. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm those statutory purposes. Relevant to this is the duty on public bodies to 'have regard' for those statutory purposes in carrying out their functions (section 11 A(2) of the National Parks and Access to the Countryside Act 1949 (as amended)). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider GI. Relevant aspects of local authority GI strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 98 and 170 of the NPPF highlights the important of public rights of way and access.

Page 3 of 9

Development should consider potential impacts on access land, common land, rights of way, coastal access routes and coastal margin in the vicinity of the development and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails, including the England Coast Path. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer.

Biodiversity Net gain

Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. We draw your attention to Para 170, point d and Para 175, point d of the National Planning Policy Framework which states that:

Para 170: "Planning policies and decisions should contribute to and enhance the natural and local environment by:

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures".

Para 175: "When determining planning applications, local planning authorities should apply the following principles:

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity".

Natural England considers that all development, even small scale proposals, can make a contribution to biodiversity. Your authority may wish to refer to <u>Technical Note 2</u> of the CIEEM guide which provide useful advice on how to incorporate biodiversity net gain into developments.

Further general advice on consideration of protected species and other natural environment issues is provided at Annex II.

Should the developer wish to discuss the detail of measures to mitigate the effects described above with Natural England, we recommend that they seek advice through our <u>Discretionary Advice</u> <u>Service</u>.

If you have any queries relating to the advice in this letter please contact me on 07768 237040.

Should the proposal change, please consult us again.

Yours sincerely

Sam Kench Norfolk and Suffolk Team

Page 4 of 9

13

Annex I – Natural England's recommendations for larger scale residential developments within the 13 km Suffolk Coast RAMS zone of influence (50 units +, or equivalent, as a guide)

Developments of this scale should include provision of well-designed open space/green infrastructure, proportionate to its scale.

Whilst recreational disturbance has a number of impacts on designated sites (i.e. trampling, litter), one of the most significant impacts is the visual and noise disturbance of birds for which the SPAs are designated (although other site features are also affected). These birds are sensitive to disturbance from recreational walkers, cyclists etc. and in particular dogs off leads. With this site in close proximity to the European designated sites, it is considered that residents are likely to use these designated sites for undertaking regular recreational activities such as dog walking. Dog owners require space to walk their dogs off lead close to home and away from traffic, once or twice per day. If the onsite green space does not give adequate dog walking provision, most owners will travel elsewhere. Well-designed GI should positively accommodate off-lead exercising of dogs, in areas where this causes the least conflict with other resident's interests such as cycling, children's play equipment, sports activities and people seeking to minimise contact with dogs. We recommend that the developer consults relevant guidance and best practice documents such as <u>Planning for Dog Ownership in New Developments: Reducing Conflict – Adding Value</u> and incorporates these principles within proposed application designs.

The applicant may wish to consider to benchmark standards for accessible natural greenspace, the TCPA have published <u>Guides and Principles for Garden Communities</u>, and Guide 7, Principal 9, references 40% GI as a target quantum. The <u>Suitable Accessible Natural Green Space (SANGS)</u> guidance can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. GI design should seek to achieve the Natural England Accessible Natural Greenspace Standards, detailed in <u>Nature Nearby</u>, including the minimum standard of 2ha informal open space within 300m of everyone's home.

Such provisions can help minimise any predicted increase in recreational pressure to the European sites by containing the majority of recreation within and around the development site boundary away from European sites. We advise that the Suitable Accessible Natural Green Space (SANGS) guidance here can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. As a minimum, we advise that such provisions should include:

- · High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km¹ within the site and/or with links to surrounding
- public rights of way (PRoW)
- Dedicated 'dogs-off-lead' areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- A commitment to the long term maintenance and management of these provisions

Natural England would be happy to advise developers and/or their consultants on the detail of this at the pre-application stage through our charged Discretionary Advice Service (DAS), further information on which is available here.

 However, the unique draw of the above European sites means that, even when welldesigned, 'on-site' provisions are unlikely to fully mitigate impacts when all residential

Page 5 of 9

¹ Taken from Jenkinson, S., (2013), Planning for dog ownership in new developments: reducing conflict – adding value. Access and greenspace design guidance for planners and developers

development within reach of the coast is considered together 'in combination'. We therefore advise that consideration of 'off-site' measures (i.e. in and around the relevant European designated site(s)) is also required as part of the mitigation package for predicted recreational disturbance impacts in these cases. Such measures are to be delivered strategically through the Suffolk Coast RAMS to make the sites more resilient to increased recreational pressures. A proportionate financial contribution should therefore be secured from these developments in line with the Suffolk Coast RAMS.

Page 6 of 9

15

Annex II - Generic advice on natural environment impacts and opportunities

Sites of Special Scientific Interest (SSSIs)

Local authorities have responsibilities for the conservation of SSSIs under <u>s28G of the Wildlife &</u> <u>Countryside Act 1981 (as amended). The National Planning Policy Framework (paragraph 175c) states</u> <u>that development likely to have an adverse effect on SSSIs should not normally be permitted.</u> Natural England's SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the <u>Natural England Open Data Geoportal</u>.

Biodiversity duty

Your authority has a <u>duty</u> to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available <u>here</u>.

Protected Species

Natural England has produced <u>standing advice²</u> to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. The list of priority habitats and species can be found <u>here³</u>. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found <u>here</u>.

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland <u>Inventory</u> which can help identify ancient woodland. Natural England and the Forestry Commission have produced <u>standing</u> <u>advice</u> for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

Protected landscapes

For developments within or within the setting of a National Park or Area or Outstanding Natural Beauty (AONB), we advise you to apply national and local policies, together with local landscape expertise and

² <u>https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals</u> ³<u>http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx</u>

Page 7 of 9

information to determine the proposal. The National Planning Policy Framework (NPPF) (paragraph 172) provides the highest status of protection for the landscape and scenic beauty of National Parks and AONBs. It also sets out a 'major developments test' to determine whether major developments should be exceptionally be permitted within the designated landscape. We advise you to consult the relevant AONB Partnership or Conservation Board or relevant National Park landscape or other advisor who will have local knowledge and information to assist in the determination of the proposal. The statutory management plan and any local landscape character assessments may also provide valuable information.

Public bodies have a duty to have regard to the statutory purposes of designation in carrying out their functions (under (section 11 A(2) of the National Parks and Access to the Countryside Act 1949 (as amended) for National Parks and S85 of the Countryside and Rights of Way Act, 2000 for AONBs). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Heritage Coasts are protected under paragraph 173 of the NPPF. Development should be consistent the special character of Heritage Coasts and the importance of its conservation.

Landscape

Paragraph 170 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Landscape Institute Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in <u>GOV.UK guidance</u>. Agricultural Land Classification information is available on the <u>Magic</u> website on the <u>Data.Gov.uk</u> website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra <u>Construction Code of Practice for the Sustainable</u> <u>Use of Soils on Construction Sites</u>, and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Environmental enhancement

Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.

Page 8 of 9
- · Creating a new pond as an attractive feature on the site.
- · Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, GI or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links. Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Page 9 of 9

18

Agenda Item 11 ES/0868



Habitats Regulations Assessment of the Residential Development Brief WLP2.14 – Land North of Union Lane, Oulton

July 2021

Contents

1.	Introduction	1
2.	Protected sites covered by this report	3
3.	Residential Development Brief WLP2.14 – Land North of Union Lane, Oulton	4
4.	Other Plans and Projects	4
5.	Assessment of likely effects of the Draft Residential Development Brief WLP2.2	14
– La	nd North of Union Lane, Oulton on habitat sites	6
6.	Appropriate Assessment	12
7.	Summary and conclusions	14
Арр	endix 1: Sources of background information	15
Арр	endix 2: Locations of habitat sites	16
Арр	endix 3: Relevant habitat sites	19
Арр	endix 4: Natural England Consultation Response	27

1. Introduction

- 1.1 The Conservation of Habitats and Species Regulations (2017) (as amended) provide protection for sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. The network consists of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both types can also be referred to as European Sites. The National Planning Policy Framework (NPPF) states that Ramsar sites should be afforded the same level of protection and refers to SACs, SPAs and Ramsar sites as 'Habitat Sites'.
- 1.2 The requirement to undertake Habitats Regulation Assessment (HRA) of development plans is set out in the Conservation of Habitats and Species Regulations (2017) (as amended).
- 1.3 Regulation 105 of the Conservation of Habitats and Species Regulations (2017) (as amended, including through EU exit legislation) states:

'Where a land use plan:

- (a) Is likely to have a significant effect on a European sites or a European offshore marine site (either alone or in combination with other plans or projects), and
- (b) Is not directly connected with or necessary to the management of the site, The plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.'
- 1.4 The HRA is therefore undertaken in stages and should conclude whether or not a proposal or policy would adversely affect the integrity of any sites.
 - Stage 1: Determining whether a plan is likely to have a significant effect on a European site. This needs to take account of the likely impacts in combination with other relevant plans and projects. This assessment should be made using the precautionary principle. The screening assessment must reflect the outcomes of the 2018 judgement of the Court of Justice of the European

Union¹, which has ruled that where mitigation is necessary this must be identified through an Appropriate Assessment.

- Stage 2: Carrying out Appropriate Assessment and ascertaining the effect on site integrity. The effects of the plan on the conservation objectives of sites should be assessed, to ascertain whether the plan has an adverse effect on the integrity of a European site.
- Stage 3: Identifying mitigation measures and alternative solutions. The aim of this stage is to find ways of avoiding or significantly reducing adverse impacts, so that site integrity is no longer at risk. If there are still likely to be negative impacts, the option should be dropped, unless exceptionally it can be justified by imperative reasons of overriding public interest.
- 1.5 The WLP2.14 Land North of Union Lane, Oulton, Residential Development Brief is being produced by East Suffolk Council. The Development Brief will apply to the site allocation as identified in Policy WLP2.14 of the East Suffolk Council- Waveney Local Plan (March 2019). This report considers whether there are likely to be significant effects on habitat sites and whether a full Appropriate Assessment may be required.
- 1.6 East Suffolk Council is covered by two Local Plans, the East Suffolk Council -Suffolk Coastal Local Plan adopted September 2020 and the Waveney Local Plan adopted March 2019. In addition, the Broads Local Plan covers the Broads Authority area of the District. Policy WLP2.14 is an allocation within the Waveney Local Plan (March 2019).
- 1.7 The Waveney Local Plan was subject to Habitats Regulations Assessment as part of its production. Where screening identified a likely significant effect, an Appropriate Assessment was undertaken and the mitigation measures identified were incorporated within the Local Plan, resulting in a conclusion that the plan will not lead to any adverse effects on Habitat sites within and in

¹ C-323/17 – People over Wind, Peter Sweetman v Coillte Teoranta

the vicinity of the (then) Waveney District. All site allocations within the Local Plan (including site WLP2.14) were considered as part of the Local Plan HRA.

1.8 The Appropriate Assessments for both the Waveney and Suffolk Coastal Local Plans identified recreational disturbance, particularly from dog walkers, as a likely significant effect. To address this, the Council has subsequently undertaken to produce a Recreational Avoidance and Mitigation Strategy (RAMS) and requires payment towards mitigation measures from residential developments within 13km of the protected Habitat sites.

2. Protected sites covered by this report

2.1 Sites included in this assessment are listed in Table 1. This includes all sites that are within 20km of WLP2.14 – Land North of Union Lane, Oulton (for consistency with the distances applied within the HRA of the Waveney Local Plan and adopting the precautionary approach). The locations of the sites are shown on maps in Appendix 2 and the Qualifying Features and Conservation Objectives of the sites are contained in Appendix 3, along with a summary of the pressures and threats as documented in the Appropriate Assessment for the Local Plan.

The Broads SAC	
Benacre to Easton Bavents Lagoons SAC	
Minsmere to Walberswick Heaths and Marshes SAC	
Dews Ponds SAC	
Southern North Sea SAC	
Broadland SPA	
Benacre to Easton Bavents SPA	
Outer Thames Estuary SPA	
Minsmere-Walberswick SPA	
Broadland Ramsar	
Minsmere-Walberswick Ramsar	

Table 1: Relevant habitat sites

3. Residential Development Brief WLP2.14 – Land North of Union Lane, Oulton

- 3.1 This HRA report reviews the Draft Residential Development Brief WLP2.14 Land North of Union Lane, Oulton.
- 3.2 Section 1 of the development brief states that site WLP2.14 has been allocated for approximately 150 dwellings in the East Suffolk Council- Waveney Local Plan. This section summarises the purpose of the brief, explaining the relationship between the development brief and the developments management process. This section also highlights the additional documents that will need to be produced to support any future planning application on the site and sets out information on the relevant Community Infrastructure (CIL) charging zone and Recreational Avoidance and Mitigation Strategy (RAMS) (see para 1.7 above). Included here is also a link to the East Suffolk residential development HRA template which includes additional Suffolk Coast RAMS mitigation measures at Annex 1.
- 3.3 Section 2 sets out the policy context for the site, including a copy of the relevant Local Plan policy and referce to other policy requirements that may need to be addressed by any future development proposals.
- 3.4 Section 3 provides further context for the site outlining what currently exists on and around the site in terms of the built, natural and historic environments.
- 3.5 Section 4 set out what will be expected from future development proposals in response to the development considerations highlighted in section 3. This section of the residential development brief is divided into three sub-sections covering 'creating a built form', 'landscape and heritage integration' and 'streets and movement'.

4. Other Plans and Projects

4.1 Regulation 105 of the 2017 Regulations (as amended, including through EU exit legislation) requires consideration to be given to whether a Plan will have an effect either alone or in combination with other plans or projects.

- 4.2 As noted in the introduction, the other key plan is the Local Plan. The East Suffolk Council- Waveney Local Plan was subject to Examination in autumn of 2018 and adopted at Full Council on 20th March 2019. The Local Plan sets out the broad scale and distribution of development across the northern area of East Suffolk formerly covered by Waveney District Council.
- 4.5 The Residential Development Brief WLP2.14 Land North of Union Lane, Oulton adds detail to policy WLP2.14 of the Local Plan. Local Plan policy WLP2.14 allocates land north of Union Lane for a residential development of approximately 150 dwellings. The development brief sets a framework for the delivery of this quantum of development.
- 4.6 Through the production of the Waveney Local Plan, a screening process considered each policy (including allocation policies) in the Local Plan and concluded whether significant effects are likely and that an Appropriate Assessment is needed. The Appropriate Assessment of The Waveney Local Plan has subsequently considered the following themes
 - o Transport and air quality
 - o Water quality
 - o Flood risk and coastal erosion,
 - o Tourism, retail and employment development, and
 - o Recreation (described as visitation in the HRA)
- 4.7 Mitigation measures were identified within the Appropriate Assessment and were incorporated within the Local Plan, resulting in a conclusion that the plan will not lead to any adverse effects on the integrity of Habitat sites within and in the vicinity of the (then) Waveney District.

Assessment of likely effects of the Draft Residential Development Brief WLP2.14 – Land North of Union Lane, Oulton on habitat sites

5.1 Table 3 below considers each relevant section of the Draft Residential Development Brief WLP2.14 – Land North of Union Lane, Oulton in relation to whether there is potential for a likely significant effect on protected habitat sites. This constitutes Stage 1 as set out under paragraph 1.4 above. Consideration is given to the characteristics and location of the protected sites. The relevant sections are considered within the context of the Local Plan policies from which they hang and which have themselves been subject to Habitats Regulations Assessment, as set out in section 4 above.

Section	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
1. Introduction	This section states that site WLP2.14 has been allocated for	Benacre to Easton Bavents	Recreational	Yes
	approximately 150 dwellings in the East Suffolk Council-	Lagoons SAC; Benacre to	impacts.	
	Waveney Local Plan. The development brief sets a	Easton Bavents SPA and		
	framework for delivering a quantum of development in	Minsmere to Walberswick		
	accordance with the Local Plan policy.	Heaths & Marshes SAC /		
		Minsmere-Walberswick SPA/		
	This section also highlights the additional documents that	Ramsar.		
	will need to be produced to support any future planning			
	application on the site and includes reference to the			
	relevant RAMS charging zone and the East Suffolk			
	residential development HRA template which includes			
	additional Suffolk Coast RAMS mitigation measures at			
	Annex 1.			
	As stated in this section, WLP2.14 falls within the 13km			
	RAMS Zone of Influence (Zone B). Policy WLP2.14 of the			
	Waveney Local Plan, from which this development brief			
	'hangs', was subject to the HRA Appropriate Assessment as			
	part the production of the Local Plan. This concluded that			

Section	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
	residential development in this area could pose a risk in			
	terms of increased recreational pressure.			
	Potential likely significant effect on protected habitat			
	sites from increased recreational disturbance as the result			
	of population growth arising from increased residential			
	development is therefore predicted.			
2. Policy Context	This section sets out the policy context for the site,	None.	None.	No.
	including a copy of the relevant Local Plan policy.			
	This section includes reference to the fact that			
	development of the site might fall under schedule 2 of the			
	EIA Regulation and that a request for screening will be			
	required to determine whether an Environmental			
	Assessment is required.			
	Also included in section 2 is a link to the HRA template			
	which highlights additional mitigation measures (in			
	addition to a RAMS contribution) which maybe required.			
	This section is mostly descriptive, providing links to the			
	other policy considerations that will need to be taken into			

Section	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
	account as part of any future proposals. This section will not			
	give rise to any likely significant effects.			
3. Development	This section outlines what currently exists on and around	None.	None.	No.
Considerations	the site in terms of the built, natural and historic			
	environments which will need to be considered by any			
	proposal.			
	This section is purely descriptive and will not give rise to any			
	likely significant effects.			
4. Development	This section highlights what will be expected from	None.	None.	No.
Framework-	development proposals in response to the development			
Creating a built	considerations raised in the previous section. The first sub-			
form	section relates to 'creating a built environment' and sets a			
	framework for the design and layout of the site. This section			
	covers detailed design considerations and will not give rise			
	to any likely significant effects.			

Habitats Regulations Assessment Residential Development Brief WLP2.14 – Land North of Union Lane, Oulton, July 2021

Section	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
4. Development	This section highlights what will be expected from	None.	None.	No.
Framework- development proposals in response to the development				
Landscape and considerations raised in the previous section. The second				
heritage	sub-section relates to 'landscape and heritage integration'			
integration	and covers key considerations that will need to be			
	addressed as part of any future proposals. This section			
	includes reference to the need to ensure biodiversity net			
	gain on the site and green infrastructure improvements.			
	The reference to green infrastructure improvements is in			
	line with the requirements set out in the HRA record			
	template. This section will not give rise to any likely			
	significant effects.			
4. Development	This section highlights what will be expected from	None.	None.	No.
Framework-	development proposals in response to the development			
Streets and	considerations raised in the previous section. The final sub-			
Movement	section relates to 'streets and movement', setting out the			
	main access considerations that will need to be addressed			
	as part of any future proposals. This section includes			
	information on pedestrian and cycle access with reference			
	to the need to ensure cycling and walking connections and			

Habitats Regulations Assessment Residential Development Brief WLP2.14 – Land North of Union Lane, Oulton, July 2021

Section	Assessment of potential impact on Natura 2000 sites	Natura 2000 sites that could possibly be affected	Likely significant effect identified	AA needed?
	links into the existing public rights of way. Ensuring good			
	walking opportunities from the site is in accordance with			
	the wider aims of the RAM strategy and the additional			
	advice provided as part of the HRA record template. This			
	section will not give rise to any likely significant effects.			

11

6. Appropriate Assessment

- 6.1 The screening for likely significant effects (table 3) has identified one section (section 1) for more in-depth consideration within an appropriate assessment. Once a likely significant effect has been identified, the purpose of the appropriate assessment is to examine evidence and information in more detail to establish the nature and extent of the predicted impacts, in order to answer the question as to whether such impacts could lead to adverse effects on Habitat site integrity. Competent authorities should have enough evidence to satisfy themselves that there are feasible measures to prevent adverse effects.
- 6.2 As set out in table 3 above, section 1 of the WLP2.14 Land North of Union Lane, Oulton, Residential Development Brief has been identified as having a potential likely significant effect on habitat sites from increased recreational disturbance as the result of population growth arising from increased residential development.
- 6.3 The impact of increased recreation on the coastal and heathland habitat sites has already been recognised in Local Plan HRA work. This has led to collaborative working between the four Suffolk local planning authorities that lie within 13km of the coastal and heathland habitat sites. Taking a strategic approach to the habitat site mitigation has resulted in the development of the Suffolk Coast HRA Recreational Disturbance Avoidance and Mitigation Strategy (RAMS).
- 6.4 The RAM Strategy is a means by which sustainable housing growth can be delivered, whilst adequately protecting Suffolk's coastal, estuarine and heathland habitat sites. It has been developed as a strategy that provides a tariff based solution to mitigating the additional recreation pressure risks associated with new development. The RAMS sets out an integrated suite of avoidance and mitigation measures that are supported by comprehensive evidence and experience gained from other habitat site mitigation strategies.
- 6.5 The level of residential growth (approximately 150 units) set out in the Residential Development Brief is equivalent to the housing number set out in the relevant Waveney Local Plan policy (WLP2.14) and it was this quantum of development that was considered as part of the HRA of the Local Plan. As

confirmed by the conclusions of the HRA of the Local Plan, the RAM Strategy is considered capable of accommodating and mitigating the impact of the levels of residential growth being promoted through the Local Plan which this development brief adds detail to.

6.6 The requirements of the RAMS strategy have been included in policy within the Waveney Local Plan (see policy WLP8.34 – Biodiversity and Geodiversity) and this is supported by the Recreational Disturbance, Avoidance and Mitigation Strategy Supplementary Planning Document (SPD). The Local Plan policy and Supplementary Planning Document (including the additional measure outlined in annex 1 of the HRA record template) are considered to adequately enable appropriate mitigation for the recreation impacts arising from new residential development, including that identified in the WLP2.14 – Land North of Union Lane, Oulton, Residential Development Brief.

7. Summary and conclusions

- 7.1 Local Plan policy WLP2.14 allocates land north of Union Lane for a residential development of approximately 150 dwellings. The Residential Development Brief WLP2.14 Land North of Union Lane, Oulton sets a framework for the delivery of this quantum of development. The brief sets out the specific context of the site and highlights the considerations that any development on the site will need to respond to. The development brief provides additional guidance to inform the determination of planning applications on the site and should be read alongside the East Suffolk Council- Waveney Local Plan.
- 7.2 Section 1 of the WLP2.14 Land North of Union Lane, Oulton, Residential Development Brief has been identified through the HRA screening process as having a potential likely significant effect on protected habitat sites as the result of increased recreational disturbance. However, as confirmed through the HRA of the Local Plan, the Suffolk Coast HRA Recreational Disturbance Avoidance and Mitigation Strategy provides adequate measures to mitigate this impact and the Development Brief further secures these. This therefore enables a conclusion that the WLP2.14 Land North of Union Lane, Oulton, Residential Development Brief will not lead to any adverse effects on the integrity of habitat sites to be reached.
- 7.3 The draft Screening Statement was published for consultation alongside the draft development brief. Natural England, as the appropriate nature conservation body, were consulted on the draft Screening Statement and confirmed that they agree with the conclusions. Their comments can be found in Appendix 4.

Signed:

Dated: 8th July 2021

Desi Reed Planning Policy and Delivery Manager East Suffolk Council

D. Rood

Appendix 1: Sources of background information

- East Suffolk Council Waveney Local Plan (March 2019).
- The Habitats Regulations Assessment of the Waveney Local Plan (December 2018).
- Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils (May 2019).



Appendix 2: Locations of habitat sites

RAMSAR

Special Areas of Conservation



Special Protection Areas



Appendix 3: Relevant habitat sites

Name	Qualifying features (# denotes UK special responsibility)	Conservation Objectives	Pressure and threats (as summarised in the Habitats Regulations Assessment for the Waveney Local Plan
Alde-Ore and Butley Estuaries SAC, Alde-Ore Estuary SPA	H1330 Atlantic salt meadows (Glauco-Puccinellietalia maritimae) H1130 Estuaries H1140 Mudflats and sandflats not covered by seawater at low tide A151(NB) Philomachus pugnax: Ruff A132(NB) Recurvirostra avosetta: Pied avocet A081(B) Circus aeruginosus: Eurasian marsh harrier A162(NB) Tringa totanus: Common redshank A132(B) Recurvirostra avosetta: Pied avocet A183(B) Larus fuscus: Lesser black-backed gull A191(B) Sterna sandvicensis: Sandwich tern	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring: The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; The supporting processes on which qualifying natural habitats rely.	Hydrological changes, public access/disturbance, inappropriate coastal management, coastal squeeze, inappropriate pest control, changes in species distributions, invasive species, air pollution, fisheries (commercial marine and estuarine)

	A195(B) Sterna albifrons: Little		
	tern		
The Broads SAC,	H7210# Calcareous fens with	Ensure that the integrity of the site is	Water pollution, climate change,
Broadlands SPA (also	Cladium mariscus and species	maintained or restored as	invasive species, siltation,
Ramsar Site)	of the Caricion	appropriate, and ensure that the site	inappropriate water levels,
	davallianae	contributes to achieving the	hydrological changes, water
	S1016 Vertigo moulinsiana:	Favourable Conservation Status of its	abstraction, change in land
	Desmoulin`s whorl snail	Qualifying Features, by maintaining or	management, inappropriate ditch
	H7230 Alkaline fens	restoring;	management, inappropriate scrub
	H6410 Molinia meadows on	The extent and distribution of	control, changes in species
	calcareous, peaty or clayey-silt-	qualifying natural habitats and	distributions, public
	laden soils	habitats of qualifying species,	access/disturbance, undergrazing,
	(Molinion caeruleae)	The structure and function (including	drainage, direct impact from 3rd
	H91E0# Alluvial forests with	typical species) of qualifying natural	party.
	Alnus glutinosa and Fraxinus	habitats,	
	excelsior (AlnoPadion, Alnion	The structure and function of the	
	incanae, Salicion albae)	habitats of qualifying species,	
	H7140 Transition mires and	The supporting processes on which	
	quaking bogs	qualifying natural habitats and the	
	H3140 Hard oligo-mesotrophic	habitats of qualifying species rely,	
	waters with benthic vegetation	The populations of qualifying species,	
	of Chara spp	and,	
	H3150 Natural eutrophic lakes	The distribution of qualifying species	
	with Magnopotamion or	within the site.	
	Hydrocharition-type		
	vegetation		
	S1355 Lutra lutra: Otter		

Benacre to Easton Bavents Lagoon SAC, Benacre to Easton Bavents SPA	S1903 Liparis loeselii: Fen orchidS4056 Anisus vorticulus: Little ramshorn whirlpool snailH1150# Coastal lagoons, A195(B) Sterna albifrons: Little tern A021(B) Botaurus stellaris: Great bittern A081(B) Circus aeruginosus: Eurasian marsh harrie	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats, The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats roly	Public access/disturbance, water pollution, physical modification, changes in species distributions, fisheries (marine and estuarine).
Breydon Water SPA	Waterbird assemblage A037(NB) Cygnus columbianus bewickii: Bewick swan A132(NB) Recurvirostra avosetta: Pied avocet A140(NB) Pluvialis apricaria : European golden plover A142(NB) Vanellus vanellus: Northern lapwing	qualifying natural habitats rely.Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;The extent and distribution of qualifying natural habitats,	Shooting/scaring, change in land management, public access/disturbance, hydrological changes, fisheries (marine and estuarine).

	A151(NB) Philomachus pugnax:	The structure and function (including	
	Ruff	typical species) of qualifying natural	
	A193(B) Sterna hirundo:	habitats, and,	
	Common tern	The supporting processes on which	
		qualifying natural habitats rely.	
Dew's Pond SAC	S1166 Triturus cristatus: Great	Ensure that the integrity of the site is	None identified.
	crested newt	maintained or restored as	
		appropriate, and ensure that the site	
		contributes to achieving the	
		Favourable Conservation Status of its	
		Qualifying Features, by maintaining or	
		restoring;	
		The extent and distribution of	
		qualifying natural habitats,	
		The structure and function (including	
		typical species) of qualifying natural	
		habitats, and,	
		The supporting processes on which	
		qualifying natural habitats rely.	
Haisburgh, Hammond	H1110 Sandbanks which are	Ensure that the integrity of the site is	Feature location/extent/condition
and Winterton SAC	slightly covered by sea water	maintained or restored as	unknown, fisheries (commercial
	all the time H1170 Reefs	appropriate, and ensure that the site	marine and estuarine)
		contributes to achieving the	
		Favourable Conservation Status of its	
		Qualifying Features, by maintaining or	
		restoring;	
		The extent and distribution of	
		qualifying natural habitats,	

Minsmere to Walberswick Heaths and Marshes SAC, Minsmere to Walberswick SPA (also Ramsar site)	H4030 European dry heaths H1210 Annual vegetation of drift lines H1220 Perennial vegetation of stony banks A052(B) Anas crecca: Eurasian teal A021(B) Botaurus stellaris: Great bittern A081(B) Circus aeruginosus: Eurasian marsh harrier A082(NB) Circus cyaneus: Hen harrier A224(B) Caprimulgus europaeus: European nightjar A056(B) Anas clypeata: Northern shoveler A056(NB) Anas clypeata: Northern shoveler A051(B) Anas strepera: Gadwall A051(NB) Anas strepera: Gadwall A132(B) Recurvirostra avosetta: Pied	The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely. Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats, The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.	Coastal squeeze, public access/disturbance, changes in species distributions, invasive species, inappropriate pest control, air pollution, water pollution, deer, fisheries (commercial marine and estuarine)
	Gadwall A051(NB) Anas strepera: Gadwall A132(B)		
	avocet A195(B) Sterna albifrons: Little tern A394(NB) Anser albifrons albifrons: Greater white-fronted goose		

Norfolk Valley Fens SAC	H7210# Calcareous fens with	Ensure that the integrity of the site is	Inappropriate water levels,
	Cladium mariscus and species	maintained or restored as	inappropriate scrub control,
	of the Caricion davallianae	appropriate, and ensure that the site	hydrological changes, water pollution,
	S1014 Vertigo angustior:	contributes to achieving the	inappropriate cutting/mowing, water
	Narrow-mouthed whorl snail	Favourable Conservation Status of its	abstraction, undergrazing,
	H6210# Semi-natural dry	Qualifying Features, by maintaining or	overgrazing, invasive species, change
	grasslands and scrubland	restoring;	in land management, changes in
	facies: on calcareous	The extent and distribution of	species distributions, air pollution.
	substrates (Festuco-	qualifying natural habitats,	
	Brometalia) S1016 Vertigo	The structure and function (including	
	moulinsiana: Desmoulin`s	typical species) of qualifying natural	
	whorl snail H4030 European	habitats, and,	
	dry heaths H7230 Alkaline fens	The supporting processes on which	
	H6410 Molinia meadows on	qualifying natural habitats rely.	
	calcareous, peaty or clayey-silt-		
	laden soils (Molinion		
	caeruleae) H91E0# Alluvial		
	forests with Alnus glutinosa		
	and Fraxinus excelsior		
	(AlnoPadion, Alnion incanae,		
	Salicion albae) H4010 Northern		
	Atlantic wet heaths with Erica		
	tetralix		
Outer Thames Estuary	A001 (W) Gavia stellate Red-	Ensure that the integrity of the site is	None identified in Waveney Local Plan
, SPA	throated Diver A195 (B) Sterna	maintained or restored as	HRA. SIP identifies fisheries.
	hirundo Common Tern A193	appropriate, and ensure that the site	
	(B) Sternula albifrons Little	contributes to achieving the	
	Tern	Favourable Conservation Status of its	

		Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats, The structure and function (including typical species) of qualifying natural habitats, and, The supporting processes on which qualifying natural habitats rely.	
Sandlings SPA	A224: European nightjar (breeding) A246: Woodlark (breeding)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.	Changes in species distributions, inappropriate scrub control, deer, air pollution, public access/disturbance.
Southern North Sea SAC	1351: Phocoena phocoena	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation	Not identified in Waveney Local Plan HRA.

		Status of its Qualifying Features by maintaining or restoring:	
Winterton-Horsey Dunes SAC, Great Yarmouth North Denes SPA	H2110 Embryonic shifting dunes H2120 Shifting dunes along the shoreline with Ammophila arenaria ("white dunes") H2150# Atlantic decalcified fixed dunes (Calluno-Ulicetea) H2190 Humid dune slacks, A195(B) Sterna albifrons: Little Tern.	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: The extent and distribution of the habitats of the qualifying features; The structure and function of the habitats of the qualifying features; The supporting processes on which the habitats of the qualifying features rely; The population of each of the qualifying features; and The distribution of the qualifying features within the site.	Inappropriate coastal management, coastal squeeze, public access/disturbance, hydrological changes, inappropriate scrub control, inappropriate pest control, invasive species, undergrazing, air pollution

Appendix 4: Natural England Consultation Response Full response to draft development brief

Date: 23 June 2021 Our ref: 352582 Your ref:

planningpolicy@eastsuffolk.gov.uk

BY FMAIL ONLY



omer Services Hornbeam House Crewe Business Park Electra Way Crewe Cheshir CW1 6GJ

T 0300 060 3900

Planning consultation: Residential Development Brief for WLP2.14, 150 homes. Location: Land north of Union Lane, Oulton

Thank you for your consultation on the above dated 10 May 2021 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED

We consider that without appropriate mitigation a development in this location would:

- have an adverse effect on the integrity of the following European sites:
 - Benacre to Easton Bavents Lagoons Special Area of Conservation (SAC) 0 Benacre to Easton Bavents Special Protection Area (SPA) 0
- damage or destroy the interest features for which Pakefield to Easton Bavents SSSI Site of Special Scientific Interest has been notified.

In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures are required / or the following mitigation options should be secured:

- We advise that an upfront financial contribution of £321.22 per dwelling should be secured to contribute to the emerging Suffolk Recreational Disturbance Avoidance and Mitigation Strategy ('RAMS'), to mitigate the recreational disturbance impacts to designated sites by this development.
- As this development is within the RAMS 13km zone of influence and is for 50+ units, we advise that the development brief should include the provision of well-designed open space/green infrastructure (GI) that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the development site boundary. Please refer to Annex I which details the minimum provisions that on-site open space/GI, should include.

We advise that an appropriate obligation is attached to the development brief to secure these measures.

Page 1 of 9

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

Habitats Regulations Assessment

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the proposal in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any planning permission given. We advise that the mitigation requirements are clearly labelled within the development brief to ensure that developer expectations are appropriately aligned with the mitigation measures identified by the Appropriate Assessment.

Further advice on mitigation

It has been identified that this development falls within the 'Zone of Influence' (ZoI) for one or more of the European designated sites scoped into the Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy ('RAMS'). It is anticipated that new residential development (including new tourist accommodation) in this area is 'likely to have a significant effect' on the sensitive interest features of these European designated sites, through increased recreational pressure when considered either alone or 'in combination' with other plans and projects.

The RAMS has been put in place to ensure that the additional recreational pressure due to increasing levels of housing across the county is not likely to lead to an adverse effect on European designated sites on the Suffolk coast. The strategy allows mitigation to be dealt with on a strategic level, so that the relevant councils, Natural England and relevant stakeholders are able to work together to provide the best outcomes for the designated sites. It also has the benefit of streamlining the process, so reducing the amount of time taken to process individual residential planning applications for the councils and Natural England.

Natural England worked collaboratively with all the relevant councils to set up the strategy. We fully support the aims of the strategy; in our view it is the best way to provide appropriate avoidance and mitigation or measures for the European sites in question. As such, we advise that a suitable contribution to the Suffolk Coast RAMS should be sought from this residential development to ensure that the delivery of the RAMS remains viable. If this does not occur then the per house tariff in the adopted RAMS will need to be increased to ensure the RAMS is adequately funded. We therefore advise that you should not grant permission for any related application until such time as the implementation of this measure has been secured.

Furthermore, it is considered that for larger residential developments (50 units +, or equivalent, as a guide) within the 13 km Suffolk Coast RAMS zone of influence, or some smaller residential developments that are in very close proximity (200m or less) to designated sites are not able to fully mitigate the adverse impacts on European designated sites with a RAMS payment alone. Natural England recommends therefore that these developments include the provision of well-designed open space/green infrastructure (GI) that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the development site boundary.

Please refer to Annex I which details the minimum provisions that on-site open space/GI, should include.

Page 2 of 9

Site of Special Scientific Interest (SSSI)

Providing appropriate mitigation is secured to avoid impacts upon the European site(s) occurring there should be no additional impacts upon the SSSI interest features.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Other advice

In addition, Natural England would advise on the following issues.

Protected Landscapes

The proposed development is for a site within or close to a nationally designated landscape namely The Broads National Park. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

Your decision should be guided by paragraph 172 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 172 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.

The landscape advisor/planner for the National Park will be best placed to provide you with detailed advice about this development proposal. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the park's management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

The statutory purposes of the National Park are to conserve and enhance the natural beauty, wildlife and cultural heritage of the park; and to promote opportunities for the understanding and enjoyment of the special qualities of the park by the public. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm those statutory purposes. Relevant to this is the duty on public bodies to 'have regard' for those statutory purposes in carrying out their functions (section 11 A(2) of the National Parks and Access to the Countryside Act 1949 (as amended)). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider GI. Relevant aspects of local authority GI strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 98 and 170 of the NPPF highlights the important of public rights of way and access.

Page 3 of 9

Development should consider potential impacts on access land, common land, rights of way, coastal access routes and coastal margin in the vicinity of the development and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails, including the England Coast Path. The National Trails website <u>www.nationaltrail.co.uk</u> provides information including contact details for the National Trail Officer.

Biodiversity Net gain

Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. We draw your attention to Para 170, point d and Para 175, point d of the National Planning Policy Framework which states that:

Para 170: "Planning policies and decisions should contribute to and enhance the natural and local environment by:

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures".

Para 175: "When determining planning applications, local planning authorities should apply the following principles:

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity".

Natural England considers that all development, even small scale proposals, can make a contribution to biodiversity. Your authority may wish to refer to <u>Technical Note 2</u> of the CIEEM guide which provide useful advice on how to incorporate biodiversity net gain into developments.

Further general advice on consideration of protected species and other natural environment issues is provided at Annex II.

Should the developer wish to discuss the detail of measures to mitigate the effects described above with Natural England, we recommend that they seek advice through our <u>Discretionary Advice</u> <u>Service</u>.

If you have any queries relating to the advice in this letter please contact me on 07768 237040.

Should the proposal change, please consult us again.

Yours sincerely

Sam Kench Norfolk and Suffolk Team

Page 4 of 9

30

Annex I – Natural England's recommendations for larger scale residential developments within the 13 km Suffolk Coast RAMS zone of influence (50 units +, or equivalent, as a guide)

Developments of this scale should include provision of well-designed open space/green infrastructure, proportionate to its scale.

Whilst recreational disturbance has a number of impacts on designated sites (i.e. trampling, litter), one of the most significant impacts is the visual and noise disturbance of birds for which the SPAs are designated (although other site features are also affected). These birds are sensitive to disturbance from recreational walkers, cyclists etc. and in particular dogs off leads. With this site in close proximity to the European designated sites, it is considered that residents are likely to use these designated sites for undertaking regular recreational activities such as dog walking. Dog owners require space to walk their dogs off lead close to home and away from traffic, once or twice per day. If the onsite green space does not give adequate dog walking provision, most owners will travel elsewhere. Well-designed GI should positively accommodate off-lead exercising of dogs, in areas where this causes the least conflict with other resident's interests such as cycling, children's play equipment, sports activities and people seeking to minimise contact with dogs. We recommend that the developer consults relevant guidance and best practice documents such as <u>Planning for Dog Ownership in New Developments: Reducing Conflict – Adding Value</u> and incorporates these principles within proposed application designs.

The applicant may wish to consider to benchmark standards for accessible natural greenspace, the TCPA have published <u>Guides and Principles for Garden Communities</u>, and Guide 7, Principal 9, references 40% GI as a target quantum. The <u>Suitable Accessible Natural Green Space (SANGS)</u> guidance can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. GI design should seek to achieve the Natural England Accessible Natural Greenspace Standards, detailed in <u>Nature Nearby</u>, including the minimum standard of 2ha informal open space within 300m of everyone's home.

Such provisions can help minimise any predicted increase in recreational pressure to the European sites by containing the majority of recreation within and around the development site boundary away from European sites. We advise that the Suitable Accessible Natural Green Space (SANGS) guidance here can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. As a minimum, we advise that such provisions should include:

- · High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km¹ within the site and/or with links to surrounding
- public rights of way (PRoW)
- Dedicated 'dogs-off-lead' areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- A commitment to the long term maintenance and management of these provisions

Natural England would be happy to advise developers and/or their consultants on the detail of this at the pre-application stage through our charged Discretionary Advice Service (DAS), further information on which is available here.

 However, the unique draw of the above European sites means that, even when welldesigned, 'on-site' provisions are unlikely to fully mitigate impacts when all residential

Page 5 of 9

¹ Taken from Jonkinson, S., (2013), Planning for dog ownership in new developments: reducing conflict – adding value. Access and greenspace design guidance for planners and developers

development within reach of the coast is considered together 'in combination'. We therefore advise that consideration of 'off-site' measures (i.e. in and around the relevant European designated site(s)) is also required as part of the mitigation package for predicted recreational disturbance impacts in these cases. Such measures are to be delivered strategically through the Suffolk Coast RAMS to make the sites more resilient to increased recreational pressures. A proportionate financial contribution should therefore be secured from these developments in line with the Suffolk Coast RAMS.

Page 6 of 9

Annex II - Generic advice on natural environment impacts and opportunities

Sites of Special Scientific Interest (SSSIs)

Local authorities have responsibilities for the conservation of SSSIs under <u>s28G of the Wildlife &</u> <u>Countryside Act 1981 (as amended). The National Planning Policy Framework (paragraph 175c) states</u> <u>that development likely to have an adverse effect on SSSIs should not normally be permitted.</u> Natural England's SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the <u>Natural England Open Data Geoportal</u>.

Biodiversity duty

Your authority has a <u>duty</u> to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available <u>here</u>.

Protected Species

Natural England has produced <u>standing advice²</u> to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. The list of priority habitats and species can be found <u>here³</u>. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found <u>here</u>.

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland <u>Inventory</u> which can help identify ancient woodland. Natural England and the Forestry Commission have produced <u>standing</u> <u>advice</u> for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

Protected landscapes

For developments within or within the setting of a National Park or Area or Outstanding Natural Beauty (AONB), we advise you to apply national and local policies, together with local landscape expertise and

² <u>https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals</u>

³http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiver sity/protectandmanage/habsandspeciesimportance.aspx
information to determine the proposal. The National Planning Policy Framework (NPPF) (paragraph 172) provides the highest status of protection for the landscape and scenic beauty of National Parks and AONBs. It also sets out a 'major developments test' to determine whether major developments should be exceptionally be permitted within the designated landscape. We advise you to consult the relevant AONB Partnership or Conservation Board or relevant National Park landscape or other advisor who will have local knowledge and information to assist in the determination of the proposal. The statutory management plan and any local landscape character assessments may also provide valuable information.

Public bodies have a duty to have regard to the statutory purposes of designation in carrying out their functions (under (section 11 A(2) of the National Parks and Access to the Countryside Act 1949 (as amended) for National Parks and S85 of the Countryside and Rights of Way Act, 2000 for AONBs). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Heritage Coasts are protected under paragraph 173 of the NPPF. Development should be consistent the special character of Heritage Coasts and the importance of its conservation.

Landscape

Paragraph 170 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Landscape Institute Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in <u>GOV.UK quidance</u>. Agricultural Land Classification information is available on the <u>Magic</u> website on the <u>Data.Gov.uk</u> website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra <u>Construction Code of Practice for the Sustainable</u> <u>Use of Soils on Construction Sites</u>, and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Environmental enhancement

Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.

Page 8 of 9

- · Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, GI or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links. Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Page 9 of 9

Agenda Item 12

ES/0870



CABINET

Tuesday, 07 September 2021

Subject	First Light Festival 2022
Report by	Councillor Craig Rivett
	Deputy Leader and Cabinet Member with responsibility for Economic Development
	Councillor Letitia Smith Cabinet Member with responsibility for Communities, Leisure & Tourism
	Cabinet Member with responsibility for Communities, Leisure & Tourism
Supporting	Paul Wood
Officer	Head of Economic Development and Regeneration
	paul.wood@eastsuffolk.gov.uk
	07798 797275

Is the report Open or Exempt? OPEN

Category of Exempt	Not applicable
Information and reason why it	
is NOT in the public interest to	
disclose the exempt	
information.	
Wards Affected:	Kirkley & Pakefield

Purpose and high-level overview

Purpose of Report:

The purpose of this report is to update the Cabinet on the work and progress of the First Light Festival and request funding to support a full festival programme in 2022.

Options:

Option one: Use the underspend from the Business Rates Retention Scheme (2019/20) already earmarked for the First Light Festival (£114,277) and a further £85,723 to fund a full festival programme in 2022. This will enable the organisers to deliver a full festival programme in 2022 with community projects and new youth music and theatre zones.

Option two: Agree to award a total of £114,277 that remains available from the 2019/20 Business Rates Retention Scheme; therefore, we are not asking members to commit any new money to this festival. The scale of the programme would need to be reviewed and reduced to meet this budget.

Option three: Agree not to financially support the festival in 2022, which will cut the budget by 50% and will significantly impact on the delivery, scale and ambition.

Recommendation/s:

1. That Cabinet notes the significant positive impact of the First Light Festival to the local economy and communities and the positive response to the Longest Days of Summer 2021.

2. That Cabinet agrees to support the 2022 First Light Festival with a grant of £200,000 comprising the already allocated £114,277 from the Business Rate Pilot Reserve and a further £85,723 growth to the General Fund in 2022/23.

Corporate Impact Assessment

Governance:

No Impacts.

ESC policies and strategies that directly apply to the proposal:

ES Strategic Plan

ES Economic Growth Plan

Lowestoft Cultural Strategy 2025 'Celebrating Culture on the Edge'

Lowestoft Town Investment Plan 2020-2030

Environmental:

The First Light Festival CIC has an Environmental Policy which sets out policy and procedures to meet environmental legislation and approved codes of practice, including:

• To reduce impacts from pollution, emissions, and waste

- To encourage more sustainable forms of transport
- To sustainably manage the use of all resources, energy, water, and procurement
- To raise awareness and encourage participation in environmental matters
- To assist performers and festival goers to participate in the festivals in an environmentally sensitive way

Equalities and Diversity:

An equalities impact assessment has been completed which demonstrates that the FLF will have a positive impact on the ten characteristic groups. The festival is free entry, which removes any financial barriers to access, especially for residents from lower socioeconomic backgrounds. The festival programme provides opportunities for everyone to engage and enjoy music, dance, film, talks, walks, sports, and workshops. There will be a range of food and drink on offer during the 24-hour festival that cater for all dietary requirements and the festival organisers work with protected characteristic groups to develop their festival programme. The upper and lower promenade are accessible and festival programme takes place on both promenades and in Spring 2022 a new board walk will be installed on the South Beach, which will aid access for wheelchair users. The First Light Festival CIC have an Equality and Diversity Policy.

Financial:

It was agreed by Cabinet on 3 September 2020, to financially support the First Light Festival CIC up to a maximum of £140,000 for 2021 festival, using the 2019/20 Business Rates Retention Scheme. Due to COVID-19 restrictions a smaller scale event was held in June 2021 on a reduced budget, which leaves £114,277 unspent.

The overall budget for the festival in 2022 is £414,585 and earned income and grant support is expected, but it leaves a funding shortfall of £200,000, it is requested to carry forward the underspend of £114,277 from 2021 to the 2022 festival and award an uplift of £85,723.

Human Resources:

No Impact

ICT:

No Impacts.

Legal:

A funding agreement setting out the terms and conditions of the grant will be signed, setting out the roles and responsibilities of the First Light Festival CIC and the Council and KPIs. This will be reviewed and signed off by the Legal Team.

Risk:

A grant agreement with First Light Festival CIC will mitigate against any liabilities raised against the Council, as the First Light Festival CIC will have overall accountability and responsibilities for the festival and related activity. The First Light Festival CIC will put in place a risk register as part of the 2022 festival preparations.

	First Light Festival CIC have been consulted and have provided a budget breakdown and KPIs achieved as part of a smaller scale
External Consultees:	event (Longest Days of Summer) held in June 2021

In 2019 the CIC evaluated the impact of First Light on festival goers and received 352 surveys responses during the festival and 1033 online responses. One of the top three words used to describe audience experience was 'Inclusive' along with 'Fun' and
'Amazing'. The feedback was overwhelming positive, with 92% of people agreeing that the First Light Festival should happen again in Lowestoft and 9.2 out of 10 agreeing that the festival has left them feeling more positive about Lowestoft.

Strategic Plan Priorities

Select the priorities of the <u>Strategic Plan</u> which are supported by			Secondar
this proposal:			У
	(Select only one primary and as many secondary as appropriate) priority prioritie		
T01	Growing our Economy		
P01	Build the right environment for East Suffolk		
P02	Attract and stimulate inward investment		\boxtimes
P03	Maximise and grow the unique selling points of East Suffolk	\square	
P04	Business partnerships		
P05	Support and deliver infrastructure		
T02	Enabling our Communities		
P06	Community Partnerships		
P07	Taking positive action on what matters most		
P08	Maximising health, well-being and safety in our District		
P09	Community Pride		\boxtimes
T03	Maintaining Financial Sustainability		
P10	Organisational design and streamlining services		
P11	Making best use of and investing in our assets		
P12	Being commercially astute		
P13			\boxtimes
P14	14 Review service delivery with partners		
т04	Delivering Digital Transformation		
P15	Digital by default		
P16	Lean and efficient streamlined services		
P17	Effective use of data		
P18	Skills and training		
P19	District-wide digital infrastructure		
T05	Caring for our Environment		
P20	Lead by example		
P21	Minimise waste, reuse materials, increase recycling		\boxtimes
P22	Renewable energy		
P23	Protection, education and influence		\boxtimes
XXX	Governance		
XXX	How ESC governs itself as an authority		
How does this proposal support the priorities selected?			

T01 Growing Our Economy theme of the Strategic Plan,

P02: Attract and stimulate inward investment

The FLF has demonstrated how it showcases Lowestoft in a high profile and positive light. One of the objectives of FLF was to positively change perceptions of the town and in so doing will attract additional inward investment, especially within the cultural and creative sectors through public and private investment. This will be further enhanced by ESC's joint City of Culture bid with Great Yarmouth Borough Council.

P03: Maximise and grow the unique selling points of East Suffolk

Culture and the creative industries are a strategic priority and are increasingly seen as a driver for the local economy. The First Light Festival uses Lowestoft's USP as the most easterly town and its landscape and celebrates the changing tides, light and darkness, sun, and stars for a unique shared experience with music, dance, film, talks, walks, sports, and workshops as well as local and regional food, drinks and produce. In 2019, £90,000 invested by East Suffolk Council through retained business rates delivered approximately £900,000 of direct local financial benefit. This is a 10:1 Return on Investment. In total the festival attracted 30,000 visitors from the local area, district, and wider region.

T02 Enabling our communities

P09 - Community Pride

The socio-economic profile of Lowestoft highlights significant challenges for much of the population. Many residents suffer from income and employment deprivation, which has resulted in low levels of cultural participation and engagement, as well as a lack of optimism surrounding the town. The festival helps break down barriers and reach less engaged groups, mitigating against the disconnect between the existing creativity in the town and potential participants. The First Light Festival forms part of a wider cultural regeneration, which can tackle some of the socio-economic challenges, including promoting more cohesive communities and maintaining healthier lives. The First Light Festival 2019 attracted 30,000 visitors with 90% agreeing that 'the festival has left them feeling more positive about Lowestoft'.

T03 Maintaining Financial Sustainability

P13: Optimising our financial investments and grant opportunities

The First Light Festival CIC has been awarded a total of £69,999 from Arts Council England and Suffolk County Council, with a further unsecured £91,586 from grants and trusts and a further £53,000 from earned income. This external funding is being matched by ESC to deliver a highly ambitious programme. By maximising the leverage of this external funding ESC are supporting the delivery of a much more impactful festival which supports several of the Council's Strategic Plan priorities.

T05 Caring for our Environment

P21: Minimise waste, reuse materials, increase recycling

The FLF CIC has an environmental policy which seeks to reduce the impacts from waste and encourages the 'reduce, reuse and recycle' approach. This is targeted at both festival performers and attendees.

P23: Protection, education and influence

The FLF environmental policy includes an objective to raise awareness and encourage participation in environmental matters as part of the FLF programme.

Background and Justification for Recommendation

1	Background facts	
1.1	In January 2019 Cabinet gave approval to develop plans for a festival in Lowestoft in support of its strategic objectives. The festival was organised and delivered by First Light Festival Community Interest Company (CIC) with membership drawn from several arts organisations from Suffolk and Norfolk, with Wayne Hemingway as the creative lead.	
1.2	The Evaluation Report for the inaugural 2019 First Light Festival, showcased that there is a clear need for further investment in creative culture in the area, and a large audience has already been established through the success of the festival. The festival was recognised as a key element of cultural regeneration, tourism, and place – making for the area.	
	 First year achievements and outcomes included: Attended by 30,000 people, prior to the festival it was estimated that attendance would reach 10,000 people. 4 jobs created 248 Arts professionals involved £172,400 of external investment obtained Worked with 16 arts organisations 10 voluntary organisations involved Worked with 9 schools and colleges 100% B&Bs and hotels booked on the night of the festival 183% increase in car parking revenue 	
1.3	3 The First Light Festival has been the flagship cultural event in Lowestoft since the inaugural festival in 2019. It has changed internal and external perceptions of the town being a tired, run-down seaside resort and put Lowestoft on the national ar international map as an energetic and creative place. It has re-imagined the Sout Beach and celebrated Lowestoft's unique position on the east coast and is centra to Lowestoft place making ambitions and sits within the Lowestoft Town Investment Plan 2021-2031 in driving the cultural ambitions of the town.	
	 Below are examples of the impact in 2019: 35% of those attending had not visited Lowestoft before and 96% from those outside Lowestoft would visit again 92% said "This event has left me feeling more positive about Lowestoft" 97% said "This event is good for the profile of Lowestoft" 96% said "I would recommend First Light Festival to a friend" 98% said "I think First Light Festival should happen again in Lowestoft" 	

	 Approximately 60 pieces of regional and national print and online coverage, with an approximate reach of 1.4 million for print and 4.9 million for online. 20 pieces of regional broadcast 4 pieces of national broadcast 		
1.4	In 2020, as a result of COVID-19 the festival became an on-line event including live streaming, with videos viewed 16,747 times and had a digital reach of 49,456 people. A smaller scale event (Longest Days of Summer) was held in June 2021 which was attended by approx. 6,000 people, with a further 3,000 people engaged, including 2,500 pupils from 13 Lowestoft schools, home schooled pupils, East Coast College's Art Foundation course and community groups. The festival worked in partnership with the North Lowestoft and London Road High Street Heritage Action Zones to engage with businesses through the bird boxes art trail installations. A further 500 people took part in the Beach of Dreams project which included a 500-mile walk from Lowestoft to Tilbury Fort in Essex and the creation of 500 silks (photo below).		
1.5	In addition, the First Light Festival Dippy the Dinosaur schools workshop programme, part of the organisation's partnership with the Natural History Museum, linked up with the Dippy on Tour at Norwich Cathedral and worked with 11 schools and 600 pupils.		
1.6	The Longest Days of Summer had a digital reach of more than 30,000 people watching the Winter Solstice, Sunrise and Longest Days of Summer films. The Longest Days of Summer drew a great deal of media coverage with syndicated articles across EDP, EADT and Lowestoft Journal, items on BBC Look East and ITV Anglia and the Beach of Dreams launch event was covered in the Guardian Newspaper blog of journalist Kevin Rushby.		

2	Current position
2.1	COVID-19 has exposed a significant level of inequality and social isolation in Lowestoft, and if the town is going to be transformed as per the ambitions of the Town Investment Plan, it will need substantial investment, and the cultural and creative sector can play a significant role in this— a new way of Lowestoft seeing itself. COVID 19 has had an impact on the sector, the full extent of which will not be known for some time.
2.2	Whilst the First Light Festival CIC has delivered digital content and a smaller scale event as part of their resilience to the COVID-19 pandemic, the projected business plan growth of the festival has been significantly stunted by the last two years. This has included the return of small grants; sponsorship income being suspended and freelancers and volunteering opportunities significantly reducing.
2.3	First Light Festival 2022 will be the joyful nexus of cultural recovery for Lowestoft, which as the town recovers from COVID-19, will develop the 24 hour festival model of world class multi-arts, in a stimulating programme of free music, dance, theatre, art and science activities and performances, inspired by the place, people and spaces of Lowestoft - particularly the coastal location, bringing people together as a community and growing national reach and recognition for the festival, town and region.
2.4	First Light 2022 will be a large, expansive festival across the beach, promenades, and Kensington Gardens, with camping and a wide range of local and regionally sourced food and drink offers. A large-scale community performance of 'The Light Returns' by local folk musician John Ward will open the festival bringing together professional musicians and singers with schools, community groups, local choirs and Shanty singers in a rousing celebration of open-air singing. Across the 24-hour festival, an uplifting cross-genre mix of music from classical to contemporary, blues, jazz, folk, and international DJs will feature on the main stage, in the enlarged Beach Club Bar and in pop-up locations on the beach and in the Gardens; a new 'New Dawn' stage will showcase new young musical talent; a new Theatre tent will offer new writing talent, comedy, open mic and poetry curated by East of England Laureate Luke Wright. Dance East's exceptional programme in the Moon Dance tent will keep everyone dancing around the clock with 'a dance along' Singing in the Rain event leading into late night silent beach cinema with live music accompaniment.
2.5	Large scale artworks will animate the beach and light up the night-time, with dawn celebrated with a new music composition performed live on the beach, a Pier to Pier run and community swimming. Foraged feasts and well-being activities will highlight the fantastic South Beach environment and a large-scale kite project that will work with schools, community groups, individuals and kite flying professionals will celebrate the Sunday morning in a lively interactive event. First Light Festival 2022 will promote a 'leave no trace', sustainable policy that will grow First Light as an environmentally responsible, flagship festival.
2.6	Over the last two years, the Arts Council England have maintained a full level of support, Suffolk County Council increased their support and made the festival one of their revenue funded organisation and grant support was received from New

	Anglia LEP. This support enabled the festival to retain their core team, maintain and grow partnerships and deliver adapted/blended cultural work that maintained community and stakeholder relationships, drew significant PR and grow its digital reach.
2.7	The First Light Festival CIC has also been working closely with the Council and consultant Quarterbridge on the redevelopment of East Point Pavilion, with the ambition to form a new strand to its business model, growing a year-round programme of activity for the Pavilion and supporting the sustainability of the CIC.
2.8	The CIC intends to apply for National Portfolio Organisation (NPO) status when the programme opens later this year. Achieving this status will mean that the CIC will receive investment from Arts Council England for a four-year period, this will give the CIC more stability and allow them more time to put their business plan into action, increasing earned income and commercial sponsorship over time, which will make them more sustainable and resilient going forward.
2.9	Through securing NPO status from the Arts Council, it is expected that the CIC will become less dependent on the Council for significant grant support, with grant support decreasing over time, as earned income and commercial sponsorship increases. Furthermore, if successful, the First Light Festival CIC will become Lowestoft's first NPO. The previous round for 2018-22 National Portfolio is made up of 829 organisations that hold 842 funding agreements and covers a range of art forms and geographical areas.
2.10	The cost of delivering the festival programme in 2022, with additional community projects and new youth music and theatre zones is £414,585. For every pound the Council spends on the 2022 festival it attracts another £1.06 through external grant funding and earned income to the 2022 festival. Which has a positive spill over effects with direct and indirect benefits to the local economy. Confirmed public funding to date totals £69,999, consisting of the Arts Council (£49,999), Suffolk County Council (£20,000) and an application pending to Lowestoft Town Council for £5,000. In addition, a total of £86,586 will come from other grants, trusts and funds (including Kirkley People's Forum) and fundraising and £53,000 of earned income for the event.

3.1	To deliver a full festival programme in 2022 with community projects and new youth music and theatre zones a budget of £414,585 is needed and the organisers have identified a £200,000 shortfall. The use of previously allocated and additional funding from the Council is requested to meet this shortfall.
3.2	The festival directors accept that the level of financial support from the Council and other partners will need to reduce over time and are therefore working on plans to become more financially sustainable. This includes applying for National Portfolio Organisation status, developing new strands to their business model and

kick starting their sponsorship income.

4	Reason/s for recommendation
4.1	The FLF has proven that when a full festival programme is delivered it achieves substantial economic, social and community outputs and outcomes, including raising pride and aspiration, job creation, volunteering opportunities and increased direct and indirect spend. In addition, it has demonstrated the ability to attract visitors from beyond the usual tourist catchment areas. The hugely positive profile of this event also mitigates some of the more negative perceptions of the town and combined with the massive business and infrastructure investment taking place highlights Lowestoft as a growing, dynamic and exciting place to be.
4.2	ESC has recently submitted a joint expression of interest with Great Yarmouth BC to become the UK City of Culture 2025. If successful, this will create a step change in investment in the local cultural and creative sector and put Lowestoft (and ES) on the map at a national and international level. The First Light Festival is a significant cultural event which has strengthened the bid and a decision to not fund a full programme could damage the outcome of the bid. If the bid is successful however, this has the potential to substantially increase the scale and ambition of future festivals.

Appendices

Appendices: None.

Background reference papers:			
Date	Туре	Available From	
November 2017	South Beach Vision and Festival (REP1723) (exempt)		
November 2018	First Light Festival (REP1927) (exempt)		
September 2019	First Light Festival ES/0124		
September 2020	First Light Festival ES/0471		