

# Public Document Pack



<b>COMMITTEE:</b>	<b>BABERGH CABINET</b>
<b>DATE:</b>	<b>WEDNESDAY, 8 JUNE 2022 2.00 PM</b>
<b>VENUE:</b>	<b>KING EDMUND CHAMBER, ENDEAVOUR HOUSE, 8 RUSSELL ROAD, IPSWICH</b>

<b>Members</b>		
<u>Independent Conservatives</u> Jan Osborne John Ward (Chair) Mary McLaren	<u>Independent</u> Clive Arthey Elisabeth Malvisi Alastair McCraw	<u>Liberal Democrat</u> David Busby  <u>Green</u> Jane Gould

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## **AGENDA**

### **PART 1**

#### **MATTERS TO BE CONSIDERED WITH THE PRESS AND PUBLIC PRESENT**

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- 1 **APOLOGIES FOR ABSENCE**
- 2 **DECLARATION OF INTERESTS BY COUNCILLORS**
- 3 **BCa/22/1 TO CONFIRM THE MINUTES OF THE MEETING HELD ON 4 APRIL 2022** 5 - 10
- 4 **TO RECEIVE NOTIFICATION OF PETITIONS IN ACCORDANCE WITH THE COUNCIL'S PETITION SCHEME**
- 5 **QUESTIONS BY COUNCILLORS**
- 6 **MATTERS REFERRED BY THE OVERVIEW AND SCRUTINY OR JOINT AUDIT AND STANDARDS COMMITTEES**

## 7 FORTHCOMING DECISIONS LIST

Please note the most up to date version can be found via the website:

[Forthcoming Decisions List » Babergh](#)

### 8 **BCa/22/2 RESPONSE TO NATIONAL GRID NON-STATUTORY CONSULTATION ON THE EAST ANGLIA GREEN OVERHEAD LINE PROJECT** 11 - 24

Cabinet Member for Planning

### 9 **BCa/22/3 COST OF LIVING REPORT AND ACTION PLAN** 25 - 62

Cabinet Member for Communities and Wellbeing

### 10 **BCa/22/4 BABERGH FORMER HQ DEVELOPMENT SITE** 63 - 74

Cabinet Member for Assets and Investments

This item is exempt from call-in under Grounds of Urgency, as agreed with the Chair of the Council.

Grounds of Urgency are:

Significant inflationary pressures in the construction industry have resulted in a shortening of tender validity periods- to a period of a few weeks and sometimes only days, compared with several weeks, or months previously.

The contractor's price for phase 1 of the HQ redevelopment is valid until 10th June 2022 and therefore a decision needs to be made before this date to enable Babergh Growth to determine whether they can award the contract or not. Babergh Growth cannot award the contract until increased funding has been secured. Further delay to the award of contract in the current market would result in price increases.

## **Date and Time of next meeting**

Please note that the next meeting is scheduled for Monday, 4 July 2022 at 2.00 pm.

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# Agenda Item 3

## BABERGH DISTRICT COUNCIL

Minutes of the meeting of the **BABERGH CABINET** held in the King Edmund Chamber, Endeavour House, 8 Russell Road, Ipswich on Monday, 4 April 2022

### PRESENT:

Councillor: John Ward (Chair)

Councillors:	Jan Osborne	Clive Arthey
	David Busby	Michael Holt
	Elisabeth Malvisi	Simon Barrett
	Siân Dawson	

### In attendance:

Councillors: Mary McLaren

Officers:

- Chief Executive (AC)
- Assistant Director - Environment and Commercial Partnerships (CC)
- Assistant Director – Corporate Resources and Section 151 Officer (KS)
- Assistant Director – Law & Governance and Monitoring Officer (EY)
- Corporate Manager – Governance & Civic Office (JR)
- SRP Operations Manager (AW)
- Corporate Manager – Economy & Business (MG)
- Sustainable Travel Officer (KD)
- Senior Governance Officer (HH)

### Apologies:

Councillors: Derek Davis  
Alastair McCraw

## 97 DECLARATION OF INTERESTS BY COUNCILLORS

97.1 Councillor Osborne declared a non-pecuniary interest in item 11 in her role as the Council's representative on the Gainsborough House Society.

## 98 BCA/21/46 TO CONFIRM THE MINUTES OF THE MEETING HELD ON 7 MARCH 2022

It was RESOLVED: -

That the minutes of the meeting held on the 7 March 2022 be confirmed as a true record of the meeting.

## 99 BCA/21/47 TO CONFIRM THE MINUTES OF THE MEETING HELD 7 FEBRUARY 2022

**It was RESOLVED: -**

**That with the following amendment the minutes of the meeting held on the 7 February 2022 be confirmed as a true record.**

**Paragraph 76 amend RESOVED to RESOLVED.**

**100 TO RECEIVE NOTIFICATION OF PETITIONS IN ACCORDANCE WITH THE COUNCIL'S PETITION SCHEME**

None received.

**101 QUESTIONS BY COUNCILLORS**

None received.

**102 MATTERS REFERRED BY THE OVERVIEW AND SCRUTINY OR JOINT AUDIT AND STANDARDS COMMITTEES**

There were no matters referred.

**103 FORTHCOMING DECISIONS LIST**

The Forthcoming Decisions List was noted.

**104 BCA/21/48 HOMES ENGLAND 2021/22 COMPLIANCE AUDIT PROGRAMME - IPSWICH ROAD, BRANTHAM**

104.1 The Chair invited the Cabinet Member for Housing, Councillor Osborne to introduce the report.

104.2 Councillor Osborne provided an overview of the report and proposed the recommendation, as detailed in the report.

104.3 Councillor Busby seconded the recommendation.

104.4 Members debated the issues including that this development was an exemplar in design and demonstrated a creative approach to regeneration and that the scale of the scheme made it acceptable to residents.

**It was RESOLVED: -**

**That Babergh District Council formally acknowledged the compliance audit received from Homes England in relation to the affordable housing development at Ipswich Road, Brantham.**

**REASON FOR DECISION**

To meet the obligations set out in the funding agreement between the Homes and Communities Agency (now Homes England) and Babergh District Council in relation

to the Shared Ownership Affordable Homes Programme 2016-2021.

**105 BCA/21/49 COUNCIL TAX ENERGY REBATE 2022/23**

- 105.1 The Chain invited the Cabinet Member for Finance, Councillor Barrett to introduce the report.
- 105.2 Councillor Barrett provided a summary of the Council Tax Energy Rebate and proposed the recommendations, as detailed in the report.
- 105.3 Councillor Ward seconded the recommendations.
- 105.4 Councillor Arthey was concerned for the discretionary element of the recommendations.
- 105.5 Councillor Busby queried the payment timeline for the Council Tax Energy Rebate and the Assistant Director for Corporate Resources clarified the circumstances for the receipts for the Government funding and the payment dates.
- 105.6 Councillor Osborne asked for details for the discretionary part of the rebate payments and the SRP Operations Manager stated that the payment of £150 would be paid to around 950 households and that there was a small discretionally fund available for additional rebates.
- 105.7 In response to questions from other Members attending the meeting the SRP Operations Officer detailed the methods applied by the Council to identify primary residents in the area and how they would receive the rebate of £150. The determination of holiday homes registered, as a main residence, would depend on data matching however, the Council did not have access to data outside the area. The Council was reliant on the information provided by customers, such a matching electoral roll registrations with council tax payments and against those registered as paying the full council tax charges. In addition, the Government was undertaking work around records matching and multiple payments to account holders across the country.
- 105.8 During the debate Councillor Arthey raised his concern for the criteria for the discretionary scheme and that Cabinet should provide a steer on the scheme before it being implemented. He proposed an amended recommendation for 3.1 to be replaced by Option 2 in the report.
- 105.9 Councillor Osborne seconded the proposed amendment.
- 105.10 Members debated the amendment and some Members thought that the proposed amendment would delay the distribution of funding and over complicate the process required to implement the scheme to residents, who were in need of assistance.
- 105.11 The Monitoring Officer provided procedural advice on how to proceed with

the proposed amendment.

- 105.12 Upon the advice received from the Monitoring Officer the Cabinet Member for Finance stated that the Option 2 proposal was too bureaucratic to achieve the overall goal of providing financial assistance to residents, and he reassured Members that he would follow the steer from Cabinet in relation to payments from the discretionary scheme.
- 105.13 Councillor Arthey stated that he was satisfied that as long as the Cabinet Member for Finance followed the steer provided by Members of the Cabinet, he would withdraw his proposal for an amendment, which was supported by the seconder, Councillor Osborne.
- 105.14 Councillor Holt asked that the SRP Operations Officer and the Cabinet Member for Finance put the details of the Discretionary Scheme before Members in due course.

**It was RESOLVED: -**

- 1.1 That Cabinet gave authority to the Assistant Director for Corporate Resources in consultation with the Cabinet Member for Finance to agree the discretionary Council Tax Energy Policy, in accordance with the relevant Government guidelines.**
- 1.2 That Cabinet gave authority to the Shared Revenues Partnership (SRP) Operations Manager to administer the scheme for the Council Tax Energy Rebate and the discretionary Council Tax Energy Policy.**

#### **REASON FOR DECISION**

To provide support to households to pay energy bills.

To enable the implementation of the discretionary policy.

#### **106 BCA/21/50 BMSDC SUSTAINABLE TRAVEL VISION & LOCAL CYCLING AND WALKING INFRASTRUCTURE PLAN**

- 106.1 The Chair invited the Cabinet Member for Climate Change, Biodiversity and Sustainable Travel, Councillor Malvisi to introduce the report.
- 106.2 Councillor Malvisi provided an overview of the report and thanked the officers for their work.
- 106.3 Councillor Malvisi proposed the recommendations in the report, which was seconded by Councillor Barrett.
- 106.4 Councillor Arthey queried how the BMSDC Local Cycling and Walking Infrastructure Plan (LCWIP) tied in with Suffolk County Council (SCC) CLWIP.
- 106.5 The Sustainable Travel Officer responded to this query and additional



questions from Councillor Arthey by detailing that SCC had encouraged all boroughs and districts to produce an LCWIP, which could be merged together to supersede the SCC LCWIP and that SCC did not have any say in the individual LCWIPs. In terms of funding the highway projects it was likely that SCC did not have the funding and might submit Community Infrastructure Levy (CIL) bids to enable the projects to go ahead. Further that funding would be collaborative between Government funding and other funding streams such as CIL.

- 106.6 In response to further questions from Councillor Ward, the Sustainable Travel Officer explained that there was a complex delivery process and that this could involve providing a steer to SCC on some projects. However, some projects could be provided by Babergh District Council, such as cycling storage and locker facilities in villages to encourage visitors.
- 106.7 Councillor Busby and Councillor Holt queried the method of prioritisation of the projects and how the LCWIP list of schemes would be brought forward for funding and implementation.
- 106.8 The Assistant Director for Environment and Commercial Partnerships explained that a cross party group would be looking at the list of schemes before SCC would evaluate and determine which schemes could be progressed, depending on the available funding. The list of schemes would be continually updated.
- 106.9 In a response to Councillor Dawson's question relating to the short-, medium- and long-term projects, the Sustainable Travel officer detailed the scoring criteria and methodology provided by the Government and advised that it had been slightly adjusted to provide scoring for rural areas.
- 106.10 Councillor Barrett referenced the identified projects list and queried whether some universally acknowledge unsuitable projects could be removed.
- 106.11 The Assistant Director for Environment and Commercial Partnerships stated there were currently a number of consultations being undertaken and that projects would remain on the list until they have been concluded.
- 106.12 Members continued to pose questions to the Officers including the Gainsborough Walk, the unfair disproportion of the locations in relation to deliverability, inclusion of the level of costs in the infrastructure maps, Government funding and respective fund matching by the Council and consideration of issues around getting safe routes to schools in relation to the LCWIP.
- 106.13 Councillor Busby withdrew his seconding of the proposed recommendations as he was not satisfied that the scheme included all the proposed projects listed in the LCWIP.
- 106.14 Councillor Ward seconded the recommendations as detailed in the report.
- 106.15 The Cabinet Member for Climate Change, Biodiversity and Sustainable

Travel stated that Cabinet was endorsing the LCWPI Strategy and not agreeing the list of schemes in the document.

**It was RESOLVED: -**

- 1.1 That the joint Councils' draft LCWIP and Sustainable Transport vision be endorsed.**
- 1.2 That the completion of the final documentation be delegated to the Assistant Director for Economic Development and Regeneration in consultation with the Portfolio Holder for Climate Change, Biodiversity and Sustainable Travel.**

**REASON FOR DECISION**

Endorsement is recommended so that the LCWIP can be supported and utilised as recommended by National Government guidance. The Sustainable Travel Vision will be used to inform the public about our key values, aims, ambitions and narrative around Sustainable Travel. The LCWIP will also be made public, but the key functions of this document are to inform SCC Highways and our own planning directorate of our active travel infrastructure ambitions, in order to capture opportunity for delivery.

The business of the meeting was concluded at 3:19pm.

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Chair

# Agenda Item 8

## BABERGH DISTRICT COUNCIL

<b>TO:</b> Babergh District Council Cabinet	<b>REPORT NUMBER</b> MCa/22/2
<b>FROM:</b> Cabinet Member for Planning	<b>DATE OF MEETING:</b> 8 <sup>th</sup> June 2022
<b>OFFICER:</b> Tom Barker, Assistant Director for Planning and Building Control	<b>KEY DECISION REF NO.</b> CAB351

### RESPONSE TO NATIONAL GRID NON-STATUTORY CONSULTATION ON THE EAST ANGLIA GREEN OVERHEAD LINE PROJECT

#### 1. PURPOSE OF REPORT

To allow Cabinet to debate the matter formally as the project is perceived as controversial, to seek comments on the proposed joint response of Babergh and Mid Suffolk District Councils and request delegation to the Assistant Director for Planning and Building control to send the response.

#### 2. OPTIONS CONSIDERED

- 2.1 To respond to the consultation with the response as set out in appendix a.
- 2.2 To respond to the consultation with proposed amendments to the responses set out in appendix a.
- 2.3 To not respond to the consultation.

#### 3. RECOMMENDATIONS

1. To respond to the consultation.
2. That the Assistant Director for Planning and Building Control, in collaboration with the Cabinet Members for Planning, consider any proposed amendments to the suggested response and be authorised to make amendments before submitting a response to the Government.

#### REASON FOR DECISION

To ensure the comments of the councils are set out for consideration by National Grid in the further stages of the project.

#### 4. KEY INFORMATION

The East Anglia Green Nationally Significant Infrastructure Project is a development scheme of overhead electricity lines proposed by National Grid.

The development is required to reinforce the electricity transmission network and enable connection of offshore wind generation projects, contributing to the government's net zero and 50 by 30 objectives.

The proposal includes:

- 60 km new 400 kV overhead line between Norwich and Bramford
- 120 km new 400 kV overhead line between Bramford and Tilbury
- underground cables through Dedham Vale AONB
- new 400 kV substation, to be connected into the new Bramford – Tilbury circuit, to connect North Falls and Five Estuaries offshore wind farms.

## 5. LINKS TO JOINT STRATEGIC PLAN

The Corporate Plan identifies strategic priorities, which include the environment, economy, housing, wellbeing, our customers and our communities. The project affects strategic priorities through its proposals.

## 6. FINANCIAL IMPLICATIONS

There are no financial implications to responding to the consultation.

## 7. LEGAL IMPLICATIONS

The Planning Act 2008 sets out provisions for the NSIP pre-application process including a duty for the proposer to consult parties including the local authorities and local communities affected.

The comments submitted by Babergh and Mid Suffolk District Councils respond to the statutory consultation being carried out.

There is no legal requirement to respond to this consultation.

## 8. RISK MANAGEMENT

This report is linked with item 14 of the Councils' Significant Risks, The Councils may be perceived to be untrustworthy and have a poor reputation. This may prevent it from entering into positive partnerships, secure funding and ultimately may affect our ability to work with partners, businesses and key stakeholders in achieving our strategic priorities. The key risk is set out below: -

<b>Risk Description</b>	<b>Likelihood</b>	<b>Seriousness of impact</b>	<b>Mitigation measures</b>
Failure to engage with communities and provide community leadership at a local level	Highly unlikely	Bad / serious	Ensure local representation is summarised within the consultation

## **9. CONSULTATIONS**

As part of the handling of the statutory consultation Babergh and Mid Suffolk District Councils have consulted technical advisers including:

- BMSDC Environmental Health Officers
- BMSDC Economic Development Officer
- Place Services – Heritage
- Place Services – Ecology
- Place Services – Landscape

## **10. EQUALITY ANALYSIS**

An Equality Impact Assessment (EIA) not required as this is a response to a consultation.

## **11. ENVIRONMENTAL IMPLICATIONS**

Through responding to the consultation, the impact on the environment might be mitigated if the proposals responds to the issues highlighted by technical advisers as set out in the proposed joint response from Babergh and Mid Suffolk District Councils.

## **12. APPENDICES**

A. Draft joint response – Attached.

## **13. BACKGROUND DOCUMENTS**

Consultation documents available here: <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/east-anglia-green>

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Date: May 2022

National Grid Electricity Transmission by email

## **Planning Act 2008: East Anglia GREEN**

### **RESPONSE OF BABERGH AND MID SUFFOLK DISTRICT COUNCILS: OBJECTION**

This is the response of Babergh and Mid Suffolk District Councils to the informal public consultation between 21 April and 16 June 2022 to the non-statutory pre-application consultation undertaken by National Grid Electricity Transmission for the proposed National Grid East Anglia GREEN NSIP.

Although they remain two separate sovereign councils, since 2013 Babergh and Mid Suffolk District Councils have been working together to deliver services and they share a Chief Executive, management team and joint workforce who work across both authorities. The comments below are submitted on behalf of both councils except where they are specifically attributed to a single council.

#### **Introduction**

Babergh and Mid Suffolk District Councils consider their role of protecting and promoting the interests of the districts' communities, businesses and environment to be of utmost importance and recognise the contribution Babergh and Mid Suffolk make to the unique character and quality of Suffolk and the wider eastern region.

Whilst acknowledging the government's net zero objectives, the councils are mindful of energy security, carbon reduction and energy poverty issues related to the delivery of energy development schemes and offer this response in context with their consideration of how these issues affect the districts.

#### **Principle of development**

There has recently been a notable increase in NSIP proposals and other large-scale energy developments across the country with a high proportion located in the eastern region meaning that some communities are seeing a number of proposals in the same area.

Whilst this is an understandable consequence of the location of generation development, points of network connection and the limitations of existing transmission and distribution infrastructure, the councils are concerned at the seeming lack of coordination and overview of these developments and their cumulative impacts which risks a confused and incoherent



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approach to project delivery that fails to effectively safeguard the interests of the host communities.

Although the councils acknowledge the challenge of achieving net zero, 50 by 30 and ongoing energy security and recognise their roles in contributing to the government's climate change objectives, the EA Green development would have substantial and serious impacts on the residents, businesses and environment of the Babergh and Mid Suffolk districts and the councils remain to be satisfied that this project represents the most appropriate solution to the network reinforcement objectives it is intended to address.

The councils' overriding preference is for a coordinated, offshore approach to deliver the transmission network reinforcement objectives of this and other projects in the region in order to minimise onshore infrastructure and the associated impacts on the districts communities and environment. It is unclear why sub-sea cabling options have not been brought forward for the eastern region in the same way as is being developed for the north of England and Scotland.

In the absence of greater clarity around the options for strategic offshore coordination of transmission reinforcement and a sub-sea alternative for this project Babergh and Mid Suffolk District Councils both **object** to the proposed development at this time.

The following technical and issue specific comments are offered without prejudice to that position.

## **Undergrounding**

In the event that the need for onshore cables can be demonstrated the councils request further consideration of options for undergrounding the full length of the route through the districts.

Babergh District Council is concerned to ensure the intrinsic cultural and visual value of the Stour Valley is adequately protected and raise additional concerns regarding the potential impact of sealing end compounds and the impact on the designated AONB.

Mid Suffolk District Council are concerned that much of the affected area with the district lies within an elevated and open plateau landscape occupied by numerous residential and business properties and heritage assets.

The Council welcomes the opportunity to discuss the importance of this matter and how the development can be delivered with the minimum impact possible further as the pre-application engagement progresses.

## **Opportunities**

Babergh and Mid Suffolk District councils recognise the recent growth of large-scale energy developments within the region and invite National Grid to enter into a dialogue with the councils and relevant parties to discuss coordination of project delivery as well as the exploration of opportunities for the sharing of assets / infrastructure so as to minimise the physical impacts of growth on the communities.



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The councils note the government's intention to consult on the delivery of community benefits from energy developments and encourage National Grid to engage with officers to provide a proactive position in respect of community benefits.

The project would be expected to progress having regard to, and in alignment with where appropriate, the corporate priorities of the councils in respect of job creation and investment.

The councils have previously suggested that National Grid should set up and financially support an Environmental Improvement Fund to be used on local initiatives, such as the provision of community woodlands, tree and hedgerow planting, the establishment of traditional orchards and the enhancement of wildlife habitats. Community groups, parish councils and voluntary sector organisations would be encouraged to make applications to this fund. BMSDC welcome further discussions to explore opportunities to secure benefits for the host communities arising from the development.

### **Key technical issues**

The development will have a range of impacts, some of which involve technical matters that fall within the responsibility of either the district or county councils. The following are some of the main issues that the councils wish to highlight in this response and full details of the technical officer's advice are appended.

This list is not exhaustive and does not prejudice the consideration of any other issue at this time or in the future.

#### AONB:

- Impacts on AONBs purpose as defined by Natural beauty and Special Qualities during construction. Particular concern around relative tranquility, landscape quality, scenic quality, natural heritage features and cultural heritage.
- Impacts on AONBs purpose during operation (landscape quality, scenic quality) from infrastructure eg Sealing End Compounds, new overhead powerlines
- Impacts on enjoyment of AONBs and associated value to visitor economy and operation-loss of relative wildness, relative tranquility, scenic quality, loss of reputation as place to enjoy these characteristics.
- Temporary impacts on enjoyment of AONBs during construction (access on PRoW)
- Impacts on setting of AONBs including location of Sealing End Compounds and use of T Pylons
- Reference to expected policy relating to undergrounding in nationally designated landscapes such as AONBs (draft NPS, sec 85 CRoW Act 2000 etc, Electricity Act, Holford Rules etc)
- Assessment of impacts on AONBs and measures to avoid, reduce, mitigate
- Options for compensation and mitigation.
- Potential for removal of the UKPN line (similar to Bramford to Twinstead scheme)

#### Biodiversity:

- We note that the routing constraints in Tables 3.1 only refer to statutory designated sites and we strongly recommend that non-statutory designated sites e.g. County Wildlife Sites (CWS )are also included.



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- Undergrounding in visually sensitive areas such as AONBs, may result in increased ecological impacts from trenching and construction of Cable Sealing End compounds. We are willing to be involved in fine tuning the locations and methodologies, with site visits as appropriate.
- We note that the A14 crossing near Needham Market is likely to need a complex assessment which will need to include impacts on the River Gipping and various adjacent waterbodies. Where it is considered that the alignment will need to divert around constraints, we highlight that the aim should be to avoid pylons being placed near to hedgerows and associated hedgerow trees which would consequently be affected.
- We welcome the statement in 4.5.27 that all options avoid ancient woodlands (Holford Rule 5) however there is little description of the potential impacts on Redgrave and South Lopham Fens Ramsar which is also part of Waveney and Little Ouse Valley Fens SAC.
- Based on the information provided, we support the graduated swathe for Norwich to Bramford based on Option NB1 as the preferred option.
- We understand that the Bramford to East Anglia Connection section, as well as the substation site, will need to fit in with other projects e.g. Bramford to Twinsted NSIP, and we would welcome the opportunity to input local knowledge to this element of the project.
- We note that para 5.5.3 recognised that from a Biodiversity and Ecology perspective, Options BE1 and BE2 were considered to perform more poorly than other options due to the potential for a Likely Significant Effect (LSE) on the Stour and Orwell Estuaries SPA and supporting Cattawade Marshes SSSI (which forms part of the SPA). We welcome this as NPS- EN5 states that particular attention will be needed to minimise the likelihood of large birds such as swans and geese colliding with overhead lines associated with power infrastructure particularly in poor visibility.
- We recommend that crossing the Suffolk/Essex county boundary needs careful consideration as Swans are a qualifying feature of the Stour & Orwell Estuaries SPA which includes Cattawade Marshes SSSI. We highlight that this would trigger a requirement for a shadow HRA screening report to assess impacts from EA GREEN, either alone or in combination with other plans and projects.
- We note that, overall, western options (Options BE3 and BE4) are preferred from a Biodiversity and Ecology perspective as they would not be likely to result in LSEs on these designations. However, with the exception of Option BE3, which contains (though does not route through) the Hintlesham Great Wood SSSI, all options avoid smaller areas of high amenity value or scientific interest (Holford Rule 2). Whilst Options BE3, BE4 and BE5 do contain more areas of woodland than the other options, the corridors are considered to be of sufficient width to allow the identification of alignments which would avoid such woodland. We agree that further work is required as part of the detailed routing process to refine an alignment to comply with this rule as far as possible. Whilst more westerly options are preferred from a Biodiversity and Ecology perspective, Option BE5 is assessed to have the least potential of those that pass through the Dedham Vale AONB to have potential for effects resulting in LSEs on the designations of the Orwell Estuaries SPA and Cattawade Marshes SSSI (part of the above SPA).
- Based on the information provided, we support the graduated swathe for Bramford to EAC based on Option BE5 is the preferred option.



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- Other matters: We are concerned that more information is needed to understand the impacts on hedgerows along the route, particular those that could be important for bat foraging and commuting routes for Barbastelle bats or Dormouse.
- We seek to inform choices on species options for restoration planting schemes as well as securing temporary mitigation measures during construction.

Heritage: (Please refer to Heritage Officer's response for full comment)

- The scheme should be considered holistically when developing the proposals to ensure a high-quality project which is sympathetic to the historic built environment.
- The EIA should include a Heritage Desk-Based Assessment (DBA), the objective of which is to identify all heritage assets which have the potential to be impacted by the proposals and which should therefore be taken forward for further assessment. A methodology for this should be provided and it is recommended that this is informed by Historic Environment Good Practice Advice in Planning Note 12: Statements of Heritage Significance and Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition).
- In identifying which heritage assets and their settings may be affected it is recommended, given the scale and nature of the proposals, that a study area of 5km from the graduated swathe boundary is adopted. All heritage assets within this study area including Listed Buildings, Scheduled Monuments, Conservation Areas, Registered Parks and Gardens, and non-designated heritage assets should be identified.
- Should it be determined that a heritage asset should be scoped out and not taken forward for further assessment, a clear and convincing justification for this should be provided.
- The DBA should seek to demonstrate a sound understanding of historic use/land use and ownership, and identify which farm(s)/field(s) the heritage assets were historically and/or functionally associated with, in order to fully assess the impact of the proposals on the historic, architectural, and associative value of the heritage assets.
- Furthermore, the views from and to each heritage asset should be carefully considered. The following would be considered valuable in establishing a heritage baseline: A ZTV overlaid with a Designations Map and a Viewpoint Location Plan, naming all Listed Buildings, Scheduled Monuments, Conservation Areas, Registered Parks and Gardens, and non-designated heritage assets
- The methodology for the views and visual representations should be in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) and guidance notes provided by the Landscape Institute. It is further recommended that views be undertaken during winter months at a minimum, to reflect and consider the 'worst case scenario.' All viewpoints should be consulted and agreed.
- Any heritage assets which are identified as being potentially impacted by the proposals should be taken forward for further assessment during which the effects of the proposed development, whether beneficial or harmful, on the significance of the heritage asset or on the ability to appreciate it, should be assessed.
- The third stage of any analysis is to identify the effects a development project may have on settings and to evaluate the resultant degree of harm or benefit to the significance of the heritage assets. Again, the guidance provided in Historic



Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition) should inform the methodology for analysis.

- Given the scale and nature of the proposals, it is recommended that the evaluation extend to include an assessment of cumulative impacts which may arise from other large-scale developments or similar schemes. Furthermore, complex impacts arising from the development which may not be solely visual should also be assessed.
- Once the extent to which heritage assets are impacted by the proposals, through change within their setting, is fully understood, ways to maximise enhancement and avoid or minimise harm should be explored. There may be design amendments which could mitigate any identified harm, and these should be carefully considered.
- Should the proposals result in residual 'less than substantial' harm, despite mitigation efforts, then paragraph 202 of the NPPF would be a relevant consideration and the Local Planning Authority is required to make a balanced judgement between the level of harm and the public benefits.
- Paragraph 199 should also be considered as this gives great weight to the conservation of heritage assets, as well as the statutory duty of Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 under which local planning authorities should have special regard to the desirability of preserving the settings of listed buildings and the character and appearance conservation areas.
- It is recommended that further pre-application discussions are sought after the heritage assessment is completed.

#### Landscape:

- We note that the routing constraints in Tables 3.1 and substation siting constraints only refer to nationally designated sites and residential properties. However, we recommend that locally designated sites and similar e.g. Special Landscape Areas are also included as mapped landscape and visual constraints. It would also be beneficial for valued landscape qualities for landscape character areas to be analysed as these would be particularly useful in ensuring landscapes outside of designations are appropriately reviewed and impacts minimised as far as practicably possible by routing revisions, design options and mitigation measures.
- Para 3.2.10 states that the potential to route parallel in close proximity to existing 400kV overhead lines is a principal opportunity and would restrict the geographic extent of environmental effects associated with such infrastructure. Earlier indications of the proposed power line corridor showed this was the case, however, under the new proposals, a large section of the new overhead lines will be over 4km west of the existing line, introducing landscape visual impacts in areas where the baseline landscape has not yet been affected by electricity infrastructure. We note that the Holford and Horlock rules have been used as a guide to routing and siting of new infrastructure, however we would advise further details on the existing constraints are provided to justify the new routing proposals.
- The location of Cable Sealing End compounds and proposed substations must not only be carefully considered in terms of impacts on visual amenity and landscape character, but also in regard to the setting of the AONB. It is considered that different locations of CSE compounds at extended distances from the AONB are explored to fully understand impacts on setting and natural beauty.



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- Any undergrounding in visually sensitive areas such as AONBs, may result in increased landscape impacts from trenching and construction of Cable Sealing End compounds and we would expect a full audit of the landscape features and habitats on site to be undertaken to inform the alignment and mitigation proposals.
- The National Grid's Landscape Enhancement Initiative, which is part of the Visual Impact Provision project, is very much relevant to the AONB area. However, we would advise a similar framework approach is applied to the project as a whole given the evidence available that demonstrates the overall sensitivity of the landscape. Therefore, the extant and rationale for offsite planting and landscape improvement works should align with this initiative.
- Norwich to Bramford – Sections C-E: We note that the Corridor and Preliminary Routeing and Siting Study Report identifies that the A14 crossing near Needham Market is likely to need a complex assessment which will need to include impacts on the River Gipping and various adjacent waterbodies. Where it is considered that the alignment will need to divert around constraints, we highlight that the aim should be to avoid pylons being placed near to hedgerows and associated hedgerow trees which would consequently be affected.
- Bramford to East Anglia Connection: The landscape response to cumulative impacts at and around the Bramford Sub-station needs to be carefully considered. Currently there is a number of live and upcoming applications in and around the Bramford area of an industrial character, that will have a detrimental impact on the landscape and Bramford as a settlement. Mitigation measures such as the reinforcement of historic field boundaries, restoring and planting hedgerows, as well as increasing the stock of hedgerow trees are important measures to consider on site.
- We would expect preliminary consultations on other national grid schemes to be provided at the earliest opportunity to allow us to understand the cumulative impacts and assess whether there are opportunities for cumulative mitigation measures both on and off site.
- Refer to full landscape response for further technical comment.
- The councils welcome the consideration of alternative tower types at routing and siting stages and would like to participate in discussions about pylon design options.

#### Public health:

Environmental Protection wish to see further detailed information in respect following:

- The submission of a detailed construction management plan
- The applicant should have regard to BS 5228:2009 Code of Practice of Noise and Vibration Control on Construction and Open Sites in the CMP.
- A noise assessment to be undertaken and submitted with regard to noise levels associated with both the construction phases of the proposal and resulting from operational noise. Methodology of the assessment to be agreed with the Local Planning Authority once specific details of the proposal are known.
- A lighting assessment
- A site specific risk assessment to include calculations of the maximum possible levels of non-ionizing radiation at the nearest residential properties at various floor levels. The values obtained shall then be compared to the current guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) limits for exposure to




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electromagnetic radiation. The levels quoted shall be during operation at maximum capacity/power. A valid ICNIRP certificate must also be submitted.

### Economic Development & Skills:

- As an individual project, National Grid Electricity Transmission – East Anglia GREEN, offers no substantial economic benefit in its own right. However, it should be viewed as one of the many individual projects that National Grid Plc via NGV and NGET are delivering in region and we should be working with National Grid Plc to deliver a package of training, skills and growth opportunities that engages with the local supply chain strategically across all local projects eg; Bramford to Twinstead and Norwich to Tilbury overhead lines, Suffolk to Kent marine link, Nautilus, and Eurolink interconnectors alongside this project, East Anglia GREEN.
- It is essential that we seek to maximise the inward investment, socio-economic and skills benefits of these projects, ensuring the best possible deal for the communities that are hosting this vital Net Zero transmission, connection and generation infrastructure which has significant impact on them and their environment.

### Tourism & Visitor Economy

- The pre-covid Visitor Economy in Suffolk was worth over £2bn a year to the local economy, and whilst reduced by almost 60% during 2020, we are expecting a strong recovery due to the strength of the staycation market and the rich and varied tourist offer including heritage assets, landscape designations and promoted areas, such as, two designated AONBs, the Dedham Vale, Stour Valley, Waveney Valley and Suffolk's Wool Towns.
- The Government has spent billions supporting these businesses and attractions throughout the pandemic, alongside support from VisitBritain/VisitEngland to encourage people to holiday at home and explore coast and countryside destinations across England, and we must ensure that this recovery is not negatively impacted by this, or any other, national infrastructure programme without being fully managed and mitigated.
- In order to manage these anticipated challenges, this project and its associated infrastructure will need to fully assess their direct and indirect impacts on the wider tourism, cultural and visitor economy and particularly the extent to which the physical infrastructure will impact and detract from the environmental quality of an area for recreational activity.
- The proposed route will also directly impact some of the key visitor attractions within Babergh and Mid Suffolk such as Needham Lake (the most visited free attraction in Suffolk), Hintlesham Hall, RSPB Wolves Wood, Dedham Vale, Constable Country, Stour Valley and more broadly, the wider landscape within the AONB and listed buildings and conservation areas within the market towns.



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- It is also imperative that the project considers its part in the cumulative impact on the perception and propensity of people to visit the area during the works period.
- Please note that when considering the pylon routes some routes will be more sensitive than others due to the businesses located on the route. I have not gone into this detail at this stage but can do when necessary and there is likely to be a requirement for environmental and/or economic mitigation measures to reduce the impact of this development on the local economy should it proceed.

Other:

The councils encourage National Grid to engage with local communities throughout the pre-submission stage via in-person discussions and other media, including sharing the feedback from this consultation.

The councils refer to the comments of Suffolk County Council in respect of technical matters that fall within their function.

Kind regards,



Tom Barker  
Assistant Director Planning and Building Control  
Babergh and Mid Suffolk District Councils



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**5 Point Action Plan**

# **Cost of Living Crisis**

A whole system approach to support residents to respond to the cost of living issues and enable individual and collective wellbeing through a suite of preventative / personalised measures

# Foreword

The emerging cost of living crisis will impact on some people and communities more than others, further exacerbating the inequalities that people were already experiencing as a result of the pandemic.

In March the Office of Budget Responsibility predicted that UK living standards will fall at their fastest rate since the 1950s and it will take until at least 2024 to return to pre-covid levels. It said that the fall in 2022-23 would be the biggest in a single financial year since modern records began in 1956-57 and that it would take until 2024-25 for inflation adjusted living standards to return to their pre-pandemic levels. They predicted that disposable income would fall by 2.2% in 2022-23 as earnings from work fail to keep up with soaring inflation.

The Bank of England in early May predicted that the country risks entering into a recession and that it has seen inflation rising to a 40-year high, potentially above 10% by the year's end, when a further energy price cap is expected to be implemented.

The National Institute of Economic and Social Research estimates 1.5m British households, 1 in 20, will soon face bills for food and energy which will exceed their disposable income after housing costs. It also forecasts that the country could enter a recession at the latter end of this year, thus the need to refresh this plan in the autumn.

A survey by the consultancy firm BritainThinks found the cost of living was now the dominant concern for UK households, with 90% worried about the effects of rising prices. The report suggested that 10% of people were already struggling to stay afloat.

Other similar studies, such as the one conducted by Shawbrook Bank showed that 18% of people were already losing sleep over the issues and that managing their finances was the leading cause of stress.

Sudbury & District Citizens Advice works closely with food banks in the district. A report on Foodbank usage showed that:

- Demand for food parcels in 2021 was double what it was in 2019 before the pandemic.
- Most food parcel referrals were for single people, yet the number of food referrals for families with children has trebled between 2019-21.
- Almost half of people who asked for a food parcel had a disability or long-term health condition.

- The main issues faced by those seeking support from foodbanks were associated with benefits and debt.

Coupled with the above the cost of oil has also spiralled and is affecting circa 1.5m households across the country and will also affect our rural communities who rely on oil for their energy. A report by Public Health England and the UCL Institute for Health Equity<sup>1</sup> expresses concern that cold homes as a result of fuel poverty will further exacerbate health inequalities – that is why this action plan will need to be refreshed in preparedness for winter pressures, which will also require a rethink on an appropriate suite of interventions.

The most recent performance dashboard from Health colleagues in April found that more than 50% of Social Prescribing referrals from primary care in the Suffolk-wide system were now for welfare support, debt management and advice reasons. Concerns are also being expressed that vulnerable or isolated people who live independently or in care homes could be adversely affected if they stop receiving visits from relatives and friends – which will likely cause other impacts in the system. Think tanks are already reporting that people are travelling less due to the soaring cost of fuel.

We have provided the Sudbury & District CAB with an in-year one-off 30% uplift to their grant so that they are able to maintain capacity and operations to deal with the increased demand of our residents.

A further concern is still the number of children and young people reliant on free school meals and in Babergh this is 1814.

Free School Meals is often described as an indicator of poverty and it is likely that these families will be affected disproportionately by the crisis, coupled with those on low household incomes. It is therefore incumbent that those people that need our support receive it and that must include access to well-paid work. We will run campaigns that will focus on promoting responsible employer responsibilities, debt and finance management advice throughout the district and encourage our partners to do the same.

## Our Approach:

The impact of Covid has resulted in all organisations having to rethink and digitise their operating models and that has also impacted on how consumers use services too.

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This has in effect provided extra resilience in the system, for it to be more rapid, agile and respond to people's need on the issues that are affecting people's lives. Anecdotally the system is beginning to highlight issues that the emerging crisis is now having an impact on residents and this also includes feedback from elected Members.

Our view is that focusing on cost of living issues alone will not mitigate against the health impacts that have already been exacerbated by the pandemic so we must focus on wellbeing too. We are therefore taking a two-pronged approach as outlined in this action plan: a) provide support and advice to deal with the cost of living issues; and b) support people to maintain/take responsibility for their own wellbeing. These are areas and systems that we have already invested in, both from a strategy and a financial perspective, so we are better placed than most to continue our efforts to ensure that everyone has good health.

It is important to note that it will be necessary to apply discretion to support people and prevent them from falling into crisis and this should not be seen or promoted as a universal offer. Discretionary policy implementation is not new to local government and would be operated within the context of local pre-agreed criteria, where these are not set externally.

We have been working with the CAB at locality level and as a result we believe we are among the first Districts in the country seeking to appoint a specific post that will focus on cost of living – titled Cost of Living Co-ordinator. This post will build on the operations we already have in place, including customer services, housing and welfare support and external partnerships to ensure that all partners talk to each other in meeting the needs of people. In exceptional circumstances this post will also provide a case management function that focuses on delivery of appropriate outcomes for people and their families at the cusp of crisis.

### Recap of the work we have undertaken thus far:

The County Council have brought together a range of stakeholders from across the districts to form a Poverty Board. This will help us to bring together resources, understand issues and implement joint initiatives to manage the impact of the emerging crisis.

The Council already provides Citizen Advice with a 3-year core grant provision to ensure there is longevity in providing support to people. This complements current housing/welfare support provision within the Council and the circa 30% in year one-off uplift, therefore we already have well established systems to provide support and advice to build on.

Through our tenancy support management functions, our approach is one of support first. Income officers look at each tenant individually, assessing their situation rather than just rent owed. This may involve signposting to other agencies that can assist, such as CAB, or referring to our in-house Tenancy Support Officers, who can help with maximising income, budgeting and negotiating with creditors.

As part of our Shared Revenues Partnership we make best use of our Discretionary Housing Payment budget, which supports customers whose rent is restricted due to the Local Housing Allowance, Bedroom Tax or Benefit Cap

Our Council Tax Reduction Scheme offers up to 95% reduction in Council Tax for working age residents and 100% reduction for pension age residents.

New tenants are called by their rent officer within the first 2 weeks of their tenancy. This identifies issues and provides greater support to tenants at an earlier stage. This is beneficial as it builds rapport and tenants know who to go to should they get into difficulties with their rent. It also means we can assist with benefit claims earlier on or help with referrals for debt. The Household Support grant is used where appropriate.

Alongside positive interventions locally to support people to cook healthier meals, the Department for Education have committed to three years' funding for the Holiday Activity and Food (HAF) Programme which provides free activities and meals during school holidays to young people who are eligible for free school meals. Staff at Babergh and Mid Suffolk Councils are coordinating this programme, making sure that it is available to those families most in need. The Family Park Cooking sessions are a great example of this whereby families are encouraged to cook inexpensive, healthy meals together and minimise food waste.

We will be looking to expand our social prescribing offer/model to include additional partners so that we are able to support our residents to maintain good health – whether that be use of our green spaces or having affordable access to leisure provision – this will be ratified in due course.

We will continue to explore with our partners how we can address issues linked to isolation and loneliness by thinking of innovative interventions. In essence we will continue to monitor the crisis and impact closely and respond as a system in the best way we can to meet those needs.

# This 5 Point Plan

The measures we are bringing together, and also some we are introducing, are built on the partnerships we have formed and our track record of always being able to respond as a system with maturity and by putting people at the heart of everything we do. Our 5 Point Plan is as follows:

## Cost of Living:

- 1) **Co-ordinating Government Support** to ensure it reaches those people who need it.
- 2) **Exercising discretion when providing welfare support and advice** to support those people who could potentially fall on hard times.
- 3) **Maximise partnership working and established systems to provide targeted support in localities** where there is a particular trend and need, implementing a targeted family-first approach.

## Preventing Crisis:

- 4) **Maintain Good Health** – whether that be referrals for mental health support, discounts at our gyms and swimming pools, engaging in community-led “wellbeing” initiatives, volunteering and socialising via local initiatives.
- 5) **Access to food and nutrition** – whether that be participating in healthy eating exercises/initiatives, organising a community garden to grow produce, setting up of a Community Larder or providing extra support to local food banks to meet any unmet need.

We believe putting these measures in now, together with the announcements we made during the budget earlier this year, provides us all with the best opportunity to come through this crisis together. We will of course continue to monitor the changes to people’s lives carefully and continue to respond swiftly and decisively where we can. We will keep this plan under review and update it in response to emerging need, also ensuring that it is reviewed in the autumn when we have further information and in preparation for winter pressures.

Cllr John Ward, Leader of the Council.



# Co-ordinating Government Support



# Cost of Living Crisis: 5 Point Action Plan

## Point 1: Co-ordinating Government Support

Task	Lead (dept)	Assigned to	Timeframe	Cost & Funding Source	Benefit and potential Impact
<b>Residents that are eligible for Council Tax Energy Rebate of £150 receive it: Bands A-D</b>	Shared Revenue Partnership /Finance	Assistant Director Corporate Resources	1 <sup>st</sup> April 2022 onwards	Funding from Government  BDC £4,816,950	Residents could use relief to offset against other living standard issues.
<b>Energy Rebate Discretionary fund - for households in need who would not otherwise be eligible for a</b>	Shared Revenue Partnership/Finance	Assistant Director Corporate Resources	1 <sup>st</sup> April 2022 onwards	Funding from Government  BDC £142,350	The Council's discretionary policy is being developed and we will publish this alongside details of how to apply once the details have been confirmed.



<b>Council Tax Energy Rebate.</b>					
<b>Household Support Grant of £5.1m invested across the Suffolk System to support residents against the following categories: (Food, Clothing and Utilities). The Suffolk System maximises our capacity to deploy the voluntary and community</b>	Suffolk County Council / Housing Welfare Support	Assistant Directors Housing / Communities	1 <sup>st</sup> April 2022 onwards	£5.1m (Govt. funding) for Suffolk-wide System.	The fund will help households with the cost of essentials such as food, clothing and utilities (where there is a specific need identified). <a href="https://www.gov.uk/government/publications/household-support-fund-guidance-for-local-councils/household-support-fund-final-guidance-for-county-councils-and-unitary-authorities-in-england#establishing-eligibility">https://www.gov.uk/government/publications/household-support-fund-guidance-for-local-councils/household-support-fund-final-guidance-for-county-councils-and-unitary-authorities-in-england#establishing-eligibility</a>

**sector to receive referrals via a “warm handover” and for the provider to meet the residents needs.**



# Providing welfare support and advice

**Point 2: Exercise discretion and provide welfare support and advice for people who need it the most.**

<p>Through the Council's Shared Revenues Partnership to make best use of the available Discretionary Housing Payment (DHP) budget to support those whose rent is restricted due to Local Housing Allowance, Bedroom Tax or Benefit Cap</p>	<p>Shared Revenues Partnership</p>	<p>Assistant Directors Housing / Corporate Resources</p>	<p>Ongoing</p>	<p>DWP Grant £84,814 BDC</p>	<p>DHP can help people with housing costs, including those affected by:</p> <ul style="list-style-type: none"> <li>• The benefit cap</li> <li>• Removal of the spare room subsidy in the social rented sector</li> <li>• Local Housing Allowance (LHA) rates</li> <li>• Financial hardship</li> </ul> <p>People may get a DHP to cover housing costs:</p> <ul style="list-style-type: none"> <li>• Where there is a liability to pay rent and a rent shortfall exists after Housing Benefit or UC Housing Costs are paid and the household budget is insufficient to meet that shortfall.</li> <li>• For a short period to allow time for household adjustments to contracts and subscriptions.</li> <li>• To facilitate a move that removes ongoing dependency on DHP</li> </ul> <p>DHPs cannot cover council tax or rent arrears</p>
<p><b>Council Tax Reduction Scheme offers up to 95% reduction</b></p>	<p>Shared Revenues Partnership</p>	<p>Assistant Director</p>	<p>Ongoing</p>	<p>Subject to eligibility</p>	<p>Supports working people on low income that may require support and also pension age residents.</p>

<p><b>Tax for low income working age residents and 100% reduction for pension age residents.</b></p>		<p>Corporate Resources</p>			
<p><b>Tenancy Support Management/ Income Officers continue to look at each tenant (in Council Housing) individually, assessing their situation as a whole rather than just as rent owed. This involves signposting to other agencies that can assist, such as CAB, or referring to in-house Tenancy Support Officers, who can help with maximising income, budgeting and negotiating with creditors. This also includes utilisation of the Household Support Grant.</b></p>	<p>Housing and Finance</p>	<p>Assistant Director Housing</p>	<p>Ongoing</p>	<p>Mainstream service delivery; and Household Support Grant (Govt. fund).</p>	<p>Council officers continue to provide holistic support/early intervention to prevent people from falling into debt. This will be enhanced by the Cost-of-Living Co-ordinator to ensure that signposting to other agencies leads to outcomes.</p>



# Partnership working



### Point 3: Partnership Working/Influencing Systems

<p><b>Initial scoping of data to support with enhanced visibility of customers who may require multiagency support.</b></p>	<p>Customer Services / Housing and Welfare Support / Benefits / HR</p>	<p>Assistant Director – Customers, Digital Transformation and Improvement; and Cost of Living Co-ordinator</p>	<p>Initial scoping of data to be undertaken over the summer. A more robust timeline and activities to be prepared once the cost-of-living coordinator has been recruited.</p>	<p>No additional costs – from mainstream budgets</p>	<p>Initial scoping needs to be undertaken to understand the data that key partners hold, as well as identification of internal and external data sets available to support the identification of residents who may be a higher risk of falling into crisis and therefore benefit from additional support. Some of the key areas of focus would include:</p> <p>Discussions with SODA (Suffolk Office of Data and Analytics) to understand the support they may be able to provide, being specialists in this area.</p> <p>Work with Suffolk County Council colleagues to explore the LIFT (low-income family tracker) dashboard, as part of Suffolk County Council’s tackling poverty action plan, to understand more about the benefits this data set will provide.</p> <p>Alongside the identification of key data sets, data governance arrangements, included but not limited to data sharing agreements, would need to be created and agreed with relevant</p>
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organisations to facilitate the sharing of information in a compliant manner.

Once the initial scoping has been completed, recommendations will be made to show how the data will be used, alongside proposed interventions and a communications approach to help target those resident cohorts who may be at risk of falling into crisis.

Furthermore, the data will provide us with the evidence base to support with exploring additional initiatives, above those already in place that may need to be explored and where promotion of existing initiatives is required through a communications approach. This approach will need to also be explored with Suffolk County Council as part of the tackling poverty action plan, in which they are looking to roll out regular communications related to support services for those who may require debt or food support.

The types of data that will be explored within the scoping (not exhaustive list) could include:

- Cancellation of direct debits



					<ul style="list-style-type: none"> <li>- Council tax/rent arrears - single view of debt</li> <li>- Tenants that rely on oil (alongside oil poverty data)</li> <li>- Workforce sickness rates</li> <li>- Young people skipping school meals</li> <li>- Referrals to mental health organisations</li> <li>- Trends from CABs</li> </ul> <p>The list is not exhaustive.</p>
<p><b>Appoint Cost of Living Co-ordinator (fixed term for 15 months), responsible for (a) – (f) below:</b></p> <p><b>(a) Developing/confirming (legally compliant) information sharing protocol between advice agencies and district councils for purpose of multi-agency support to</b></p>	Customer Services	Assistant Director – Customers, Digital Transformation and Improvement	Summer (following on from the recruitment and scoping exercise).	£60k (inclusive of oncosts) from DHLUC funding.	Make sure that the personal data of customers that the Council shares is only used for its intended purposes.

residents that are at a cusp of falling into crisis.					
<b>(b) Facilitate and bring together key agencies to co-ordinate responses that focus on achieving outcomes. Only on specific cases referred to the Cost-of-Living Co-ordinator.</b>	Customer Services	Assistant Director – Customers, Digital Transformation and Improvement	Summer (following on from the recruitment and scoping exercise).		Following the scoping work, recommendations will be made as to how we will work across the organisations to provide this support.
<b>(c) To analyse Partnership data/intelligence from systemwide leaders (SODA) and shared by key partners – for example the Housing/Welfare Support teams / CAB to consider the deployment of pop-up clinics via the Council’s partnerships,</b>	Customer Services	Assistant Director – Customers, Digital Transformation and Improvement	Ongoing	Included in the appointment of the Cost-of-Living Co-ordinator	Initial conversations are taking place with Suffolk County Council who have instigated a project to improve the case management approach of the Suffolk Information Partnership (SIP). We will be collectively working with Suffolk County to reduce duplication.

<p>where the demand arises to meet need.</p>					
<p><b>(d)Customer Services, Housing and Welfare Support Services – refer cases (by exception) to the Cost-of-Living Co-ordinator where all obvious steps have failed and requires more discretionary support from the Council.</b></p>	<p>Customer and Housing/Welfare Support/Shared Revenues Partnership</p>	<p>AD Customer / Housing Services</p>	<p>Summer 2022</p>	<p>Included in the appointment of the Cost-of-Living Co-ordinator</p>	<p>Some people will require specific support, so that they are not lost in a system, which could cause harm to their mental health and personal resilience if not carefully monitored. Using the scoping and data we collect we will propose a series of support/interventions to help address these needs</p>
<p><b>(e)To work with communications colleagues to pro-actively drive campaigns that are designed to promote debt and financial management advice, household warm grants to alleviate cost of living pressures and encourage people to</b></p>	<p>Customer services</p>	<p>Assistant Director Corporate Resources</p>	<p>Ongoing</p>	<p>Included in the appointment of the Cost-of-Living Co-ordinator</p>	<p>Once this has been fully scoped via the initial data scoping phase our approach to using the collective evidence to provide additional support e.g. pop up clinics or digital hubs will therefore commence.</p> <p>This work will also align with the Suffolk County communications campaign to promote finance advice, as detailed in their reducing poverty action plan.</p>

<p>take greater control as much as possible.</p>					
<p><b>(f)Alongside the established systems we already have in place, to be the Single Point of Contact for both Mid Suffolk and Babergh District Councils, key partners and for staff who need access to confidential support and advice relating to the cost of living crisis/in-work poverty related issues and work with HR to provide trends in a timely manner.</b></p>	<p>Human Resources / Customer Services</p>	<p>Assistant Director Corporate Resources</p>	<p>Ongoing/ agreed with HR and partners (needs led)</p>	<p>Included in the appointment of the Cost-of-Living Co-ordinator</p>	<p>In-work poverty is a specific issue that will impact all sectors, which in turn will have an impact on productivity, service delivery and the economy. Asking for help can also be difficult for employees. Having a Single Point Of Contact in the organisation, in addition to established systems already in place, will provide both choice and a form of “go to” for people who don’t want to raise awareness with colleagues they work closely with. Support in some cases, will be one to one, in other cases it may be attending an advice ‘clinic’ or even an organised talk on ways people can alleviate pressures - based on ongoing analysis of emerging trends.</p>
<p><b>Sudbury &amp; District CAB is provided with a 3 Year rolling revenue grant. Grants reviewed annually. Sudbury &amp; District CAB receive an</b></p>	<p>Communities</p>	<p>Assistant Director Communities &amp; Wellbeing</p>	<p>April 2022</p>	<p>In Babergh £161,868.00 in revenue grants has been</p>	<p>Providing a one-year <b>one-off</b> 30%+ uplift to Sudbury &amp; District CAB, coupled with 3-year agreements ensures that the district council have invested in the infrastructure needed for residents to seek independent advice. This also enhances the partnership and relationships with</p>

<p><b>immediate circa 30% in year uplift to their funding to provide in-year support to residents in response to increasing demand.</b></p>				<p>allocated for 22/23</p>	<p>the CAB to respond effectively to Cost of living issues.</p>
<p><b>Suffolk system-wide investment of £1m to be provided to ensure residents that require welfare related advice and support can receive it and that the voluntary and community sector is provided with a “warm handover referral” to meet that need in districts/localities and the financial support to provide the service too.</b></p>	<p>Suffolk County</p>	<p>Collaborative Communities Board / Assistant Director Communities &amp; Wellbeing</p>	<p>Ongoing</p>	<p>£1m for the Suffolk system agreed by Suffolk Public Sector Leaders.</p>	<p>Residents across the Suffolk footprint will be able to access provision/support through local agencies via the voluntary and community sector – the scheme is known as the Suffolk information partnership or “warm handover” (SIP).</p> <p>This enables the whole system to respond, rather than reliance on one part of the system.</p>





# Good health

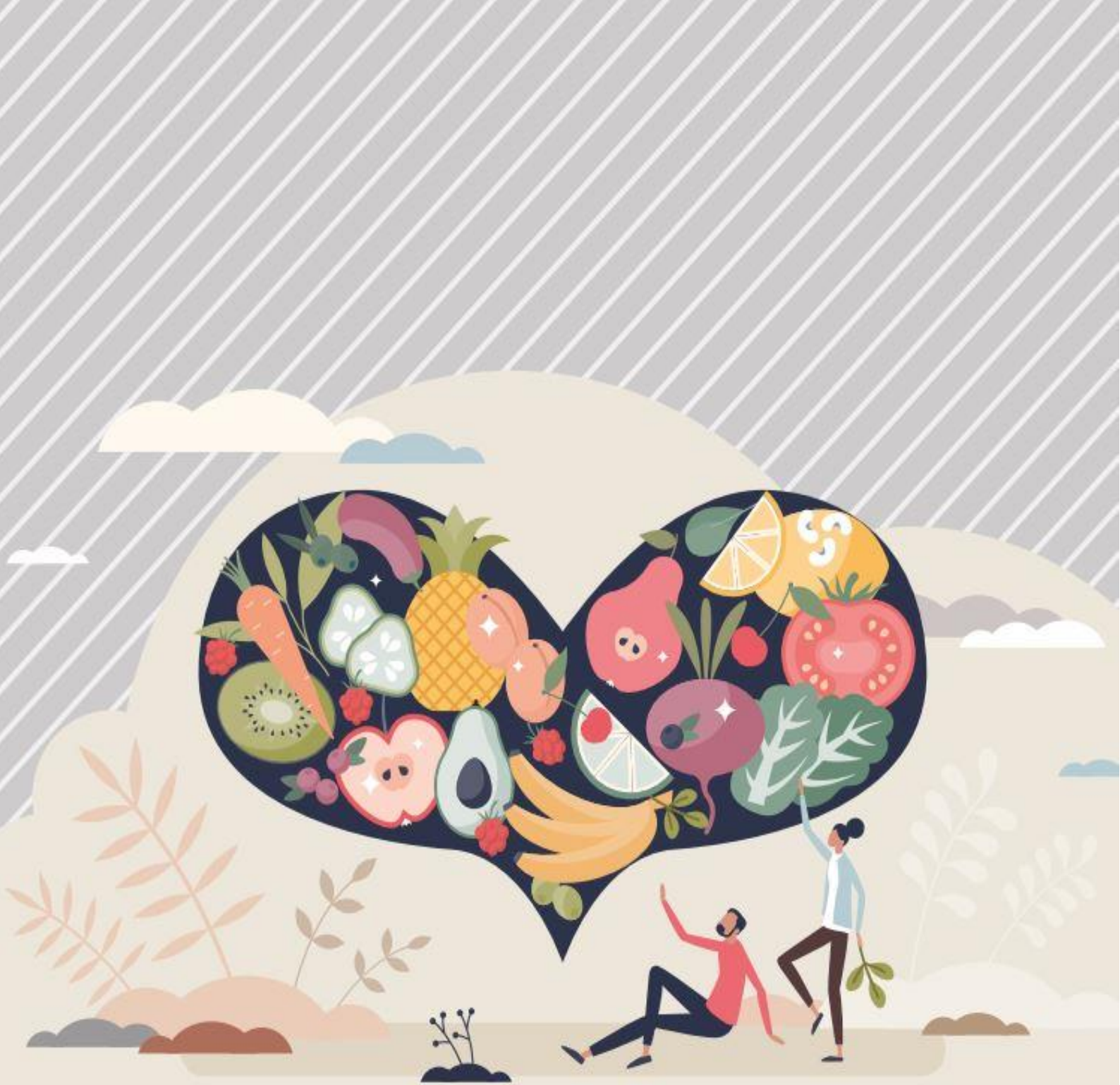
## Point 4: Maintain Good Health

<p><b>The Council with partners and local communities will organise/enable a calendar of family friendly events that everyone can participate in and feel positive about.</b></p> <p>Page 48</p>	Suffolk wide	Assistant Director Communities & Wellbeing	2022/23	Mainstream delivery	<p>Events that bring people/communities together will support mental health and wellbeing and build community resilience. Communities will be encouraged to engage in as many positive activities as possible to free themselves from the issues relating to the crisis. Council staff/elected members/partners will also be able to speak to local communities about hyper local issues which should influence any internal pivoting of initiatives.</p> <p>The events will be published on the Council's website and through media channels.</p>
<p><b>Continue and potentially expand community-led mental Health Wellbeing Projects/Support - that we know have worked/or are in the pipeline</b></p>	Communities	Assistant Director Communities & Wellbeing	2022/23	Community grant funded – work with partners based on need to potentially expand further/commission new	<p>Community led and the VCS are vital cogs in supporting communities to remain resilient. Early sharing of intelligence and early intervention and prevention will provide the Council with the best opportunity to connect residents (particularly the most vulnerable) with initiatives that are in train, or being developed.</p> <p>The Cost of Living Co-ordinator will develop relationships with third sector organisations and work alongside the Communities Team already</p>



					working with community groups and will ensure that this plan is delivered in an inclusive context.
<b>Working with key VCSE partners to understand the impact the cost-of-living crisis is having on their operational infrastructure and any increase in demand.</b>	Communities	Assistant Director Communities & Wellbeing	Ongoing	Through the appointment of the Cost-of-Living Co-Ordinator and Communities Team	Working with key VCSE partners will enable the system to better understand trends, including where there are any unmet needs that the system needs to respond to support residents.
<b>Work with partners to support the most vulnerable via the Local Welfare Assist Scheme with a fuel and travel voucher scheme for the those most in need in our communities.</b>	Communities	Assistant Director, Communities & Wellbeing	August 2022	Part of the £1m fund established by Suffolk Public Sector Leaders.	<p>National research predicts that people in care homes, rural communities, including those people who live independently and with disabilities could be disproportionately impacted by the crisis.</p> <p>To explore the possibility of a discretionary scheme that focuses on isolation prevention to help alleviate some of those pressures, as there will be a risk of impact on a range of health related issues including falls, frailty and mental health.</p>

<p><b>Working with leisure providers to scope out and expand the social prescribing model to extend it to other key partners to utilise established systems.</b></p>	<p>Communities</p>	<p>Assistant Director Communities &amp; Wellbeing</p>	<p>August 2022</p>	<p>TBC</p>	<p>Explore opportunities to expand the social prescribing offer to a discretionary scheme that <a href="#">enables partners to refer people into leisure provision that will potentially support good mental health</a>, making people become more health conscious, which will also have knock on benefits in terms of food nutrition.</p> <p>Exploit all local free sport and wellbeing provision.</p> <p><a href="#">The cost of the model should be a shared endeavour.</a></p>
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# Food and Nutrition

## Point 5: Access to Food and Nutrition

<p><b>Expand the DfE funded scheme by extending the Holiday Activities and Food Programme during school half terms for children/young people eligible for free school meals</b></p> <p>Page 52</p>	<p>Communities</p>	<p>Assistant Director Communities &amp; Wellbeing</p>	<p>3 years</p>	<p>Government Grant from DfE for Babergh</p> <p>£106,277,23</p> <p>Babergh Funding for half terms not covered by DfE funding:</p> <p>£18,000.00</p>	<p>Research has shown that the school holidays can be pressure points for some families. For some children this can lead to a holiday experience gap, with children from low-income households being:</p> <ul style="list-style-type: none"> <li>- less likely to access organised out-of-school activities</li> <li>- more likely to experience ‘unhealthy holidays’ in terms of nutrition and physical health</li> <li>- more likely to experience social isolation</li> </ul> <p>Our HAF programme is a response to this issue, with evidence showing that free holiday clubs can have a positive impact on children and young people, and that they work best when they:</p> <ul style="list-style-type: none"> <li>- provide consistent and easily accessible enrichment activities</li> <li>- cover more than just breakfast or lunch</li> <li>- involve children (and parents) in food preparation</li> </ul>
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					<ul style="list-style-type: none"> <li>- use local partnerships and connections, particularly with the voluntary and community organisation sector</li> </ul>
<p><b>Map any green spaces and allotments (working with Parish Councils) to identify possible sites that can bring communities together to grow their own produce – reinvest in initiatives that have already been successful and community led and that can be repeated elsewhere through the use of community grants.</b></p>	Communities	Assistant Director Communities & Wellbeing	Ongoing	TBC with Parish Councils + use of community grants + DHLUC funding for Community Leadership Programme.	<p>Facilitating solutions that brings communities and people together to grow their own produce will enable people to be more independent from needing support. There are also other benefits such as behaviour change, understanding of biodiversity and collective community resilience.</p> <p>The districts have a thriving third and community sector that have implemented a range of initiatives that could support local communities. It is integral that these are promoted more widely, coupled with seed funding to get initiatives off the ground that bring a range of key stakeholders together, including schools, VCS organisations, Parish Councils etc.</p> <p>Locality officers/VCS specialists can assist as facilitators for these type of initiatives if needed – most importantly these are progressive measures that increase the pride of people in local places</p>

					<p>and also improves inter-generational interactions, providing everyone with something to do.</p> <p>Community Leadership Programme that will focus on pilots to bring people and stakeholders together to decide, design and deliver local initiatives.</p>
<p><b>Participate fully in the work commissioned by the County Council to understand root causes of why people are using food banks and influence the corresponding interventions.</b></p>	<p>Communities / Suffolk wide system</p>	<p>Assistant Director Communities</p>	<p>September 2022</p>	<p>SCC funded</p>	<p>Influence locality interventions.</p>

## BABERGH DISTRICT COUNCIL

<b>TO:</b> Cabinet	<b>REPORT NUMBER:</b> <b>BCa/22/3</b>
<b>FROM:</b> Cllr Mary McLaren, Cabinet Member for Communities and Wellbeing	<b>DATE OF MEETING:</b> 08.06.2022
<b>OFFICER:</b> Nadeem Murtuja, Assistant Director for Communities and Wellbeing	<b>KEY DECISION REF NO.</b> CAB343

### **COST OF LIVING REPORT AND ACTION PLAN**

#### **1. PURPOSE OF REPORT**

The purpose of this report is to provide a phase one 5 Point Plan covering the next 6 months to respond to the emerging Cost of Living Crisis.

- 1.1 A phased approach is being taken due to the potential challenges ahead that cannot be fully predicted at the present time given the global challenges, market volatility, rising inflation and the everyday changing landscape regarding people's household budgets. This plan will therefore be kept under review and also refreshed in the autumn in preparedness to tackle winter pressures.
- 1.2 This plan is not intended to fully plug the financial pressures in the personal budgets of people, instead it focuses on two things, firstly to provide the best possible support to cope with cost of living issues through a variety of interventions at our disposal, and secondly to prevent people from falling into crisis through measures that will encourage wellbeing, self-enablement and community resilience.
- 1.3 Predictions from a range of think tanks, including ONS is that living standards will significantly fall and the Bank of England has warned that inflation could rise to 10% and the country could enter a recession. There are a wide variety of factors, including the war in Ukraine, market volatility, costs associated with supply chains and inflation rates, which will all have a cumulative impact on residents' lives, including our own workforce and that of our partners.
- 1.4 The interventions that we are proposing are only a starting point. They are mainly outward facing, however, where appropriate, they are also targeted at our own workforce.
- 1.5 By thinking ahead now in terms of people's needs, and how we respond, provides both the Council with the ability to further adapt our own service delivery infrastructure to meet the likely emerging needs that we cannot fully predict yet, underpinned with the aim of maintaining optimum service delivery for those areas that we are responsible for.
- 1.6 Working in partnership with Suffolk County Council and other system wide partners, under a principle of collaboration (as per the Overview & Scrutiny recommendation), coupled with building on the work that we have already implemented, will enable us to maximise all the levers at our disposal to respond to the emerging crisis that will

impact on all people in our District differently – ranging from anxiety and isolation to economic impacts.

## 2. OPTIONS CONSIDERED

- 2.1 To rely on just Government support and co-ordinate that activity and hope people can find their own solutions.
- 2.2 To pull together a bespoke plan that will provide residents and our workforce with assurance and confidence that they are not alone and that the District Council will utilise all levers available to connect systems to support people with advice and support on the cost of living issues. Alongside this, recognising that key to any recovery related to the emerging crisis is to maintain wellbeing under the principles of prevention, empowerment, self-enablement and activities that build community resilience, so that people at a locality level can support each other too.  
**Recommended.**

## 3. RECOMMENDATIONS

- 3.1 Agree the 5 Point Plan attached at Appendix One.
- 3.2 Delegate to the Assistant Director for Communities & Wellbeing in consultation with the Cabinet Member for Communities to keep this Plan under review and to update this in response to emerging need.

### REASON FOR DECISION

Provides assurance and confidence, ensuring that well established systems intra-connect to respond to the emerging needs of people through effective co-ordination and service delivery. The plan includes a range of measures that focus on providing advice and support, maintaining people's good health, building on the investments the Council has already made since the launch of the respective Communities and Wellbeing strategies and bringing forward an initial suite of interventions that will help improve the system long term, including the appointment of a Cost-of-Living Co-ordinator.

## 4. KEY INFORMATION

- 4.1 The emerging cost of living crisis will impact on some people and communities more than others, further exacerbating inequalities that people were already experiencing as a result of the pandemic.
- 4.2 In March the Office of Budget Responsibility predicted that UK living standards will fall at their fastest rate since the 1950s and it will take until at least 2024 to return to pre-covid levels. It said that the fall in 2022-23 would be the biggest in a single financial year, since modern records began in 1956-57, and that it would take until 2024-25 for inflation adjusted living standards to return to their pre-pandemic levels. They predicted that disposable income would fall by 2.2% in 2022-23 as earnings from work fail to keep up with soaring inflation.
- 4.3 The Bank of England in early May predicted that the country risks entering into a recession and that it has seen inflation rising to a 40 year high, potentially above 10% by the year's end, when a further energy price cap is expected to be implemented.



- 4.4 The National Institute of Economic and Social Research estimates 1.5m British households, one in 20, will soon face bills for food and energy which will exceed their disposable income after housing costs. It also forecasts the country could enter a recession at the latter end of this year, thus the need to refresh this plan in the autumn.
- 4.5 A survey by the consultancy firm BritainThinks found the cost of living was now the dominant concern for UK households, with 90% worried about the effects of rising prices. The report suggested that 10% of people were already struggling to stay afloat.
- 4.6 Other similar studies, such as the one conducted by Shawbrook Bank showed that 18% of people were already losing sleep over the issues and that managing their finances was the leading cause of stress.
- 4.7 Sudbury & District Citizen's Advice works closely with foodbanks in the district. A report on food bank usage showed that:
- Demand for food parcels in 2021 was double what it was in 2019 before the pandemic.
  - Most food parcel referrals were for single people, yet the number of food referrals for families with children has trebled between 2019-21.
  - Almost half of people who asked for a food parcel had a disability or long-term health condition.
  - the main issues faced by those seeking support from foodbanks were associated with benefits and debt.
- 4.8 Coupled with the above, the cost of oil has also spiralled and is affecting circa 1.5m households across the country, often but not exclusively those that live in our rural areas.
- 4.9 The CAB in Sudbury & District has been provided with a one-off in-year 30% uplift in their grant to maintain capacity and operations to deal with the emerging demand.
- 4.10 The most recent performance dashboard from Health colleagues in April found that more than 50% of Social Prescribing referrals from primary care in the Suffolk-wide system were now for welfare support, debt management and advice reasons.
- 4.11 Concerns are also being expressed that people who live independently or in care homes will be adversely affected if they stop receiving visits from relatives and friends, which is likely to cause other impacts in the system. Think tanks are already reporting that people are travelling less due to the soaring cost of fuel.

The number of children and young people reliant on free school meals in Babergh is 1814.

Free School Meals is recognised by most as a key national indicator for poverty and it is likely that these families will be affected disproportionately, coupled with those on low household incomes.

- 4.12 The impact of Covid has resulted in all organisations having to rethink and digitise their operating models and that has also impacted on how consumers use services. This has in effect provided extra resilience in the system for it to be more rapid, agile and respond to people's need on the issues that are affecting people's lives.
- 4.13 Anecdotally the system is beginning to pick up evidence that the emerging crisis is now having an impact on residents and this also includes feedback from elected Members.
- 4.14 Our view is that focusing on cost of living issues alone will not mitigate against the health impacts that have already been exacerbated by the pandemic, so we need to focus on people's wellbeing too. We are therefore taking a two-pronged approach as outlined in the attached action plan: a) support and advice to deal with the cost of living issues; and b) supporting people to maintain/take responsibility for their own wellbeing. These are areas and systems that we have already invested in, both from a strategy and financial perspective.
- 4.15 It is important to note that it will be necessary to apply discretion to support people and prevent them falling into crisis and this should not be seen or promoted as a universal offer. Discretionary policy implementation is not new to local government and would be operated within the context of local pre-agreed criteria, where these are not set externally.

We have been working with the CAB at a locality level and as a result we believe we are amongst the first Districts in the country looking to appoint a specific post that will focus on cost of living – titled Cost of Living Co-ordinator. This post will build on the substantial operations we already have in place including customer services, housing and welfare support and external partnerships to ensure that partners are talking to each other in meeting people's needs. In exceptional circumstances this post will also provide a case management function that focuses on delivering appropriate outcomes for people and their families at the cusp of crisis. The post will work across both Babergh and Mid Suffolk and will be funded by a payment received by the Council from DLUHC.

### **Recap of the work we have been undertaking**

- 4.16 The County Council are bringing together a range of stakeholders from across the districts to form a Poverty Board. This will help us to bring resources, understand issues and implement joint initiatives to manage the impact of the emerging crisis.
- 4.17 We therefore already have well established systems to provide support and advice to build on. The Council provides funding to Sudbury & District CAB with a rolling 3-year core grant provision to ensure there is longevity in providing support to people; this complements current housing/welfare support provision within the Council and the circa 30% one-off in year uplift to CAB in response to increased demand for the service, which will undoubtedly continue to rise further as the impact of the cost of living crisis is felt even more deeply by households. As with all organisations receiving grants, the CAB will be expected to use these funds in the most efficient way to meet the expected outcomes.
- 4.18 Through our tenancy support management, our approach is one of support first. Income Officers look at each tenant individually, assessing their wider situation rather than just rent owed. This may involve signposting to other agencies that can assist,

such as CAB or referring to our in-house Tenancy Support Officers, who can help with maximising income, budgeting and negotiating with creditors.

- 4.19 We joined the Suffolk Information Partnership (SIP) initiative, led by Suffolk County Council across Customer Services and Housing to ensure that we are able to securely make referrals to over 70 statutory and voluntary organisations.
- 4.20 As part of our Shared Revenues Partnership we make best use of the Discretionary Housing Payment budget, which supports customers whose rent is restricted due to the Local Housing Allowance, Bedroom Tax or Benefit Cap.
- 4.21 Our Council Tax Reduction Scheme offers up to 95% reduction in Council Tax for working age residents and 100% reduction for pension age residents.
- 4.22 New tenants that have homes as part of our own housing stock are called by their rent officer within the first 2 weeks of their tenancy. This identifies issues and provides greater support to tenants at an earlier stage. This is beneficial as it builds rapport and tenants know who to go to should they get into difficulties with their rent. It also means the Council can assist with benefit claims earlier on or help with referrals for debt. This support also includes utilisation of the Household Support Grant.
- 4.23 Alongside positive interventions locally to support people to cook healthier meals, the Department for Education have committed to three years' funding for the Holiday Activity and Food (HAF) Programme which provides free activities and meals during school holidays to young people who are eligible for free school meals. Our officers are coordinating this programme, making sure that it is available to those families most in need. The Family Park Cooking sessions are a great example of this whereby families are encouraged to cook inexpensive, healthy meals together and minimise food waste.
- 4.24 We will be looking to expand our social prescribing offer/model to include additional partners so that we are able to support our residents to maintain good health, whether that be use of our green spaces or having affordable access to leisure provision.
- 4.25 We will continue to explore with our partners how we can address issues like isolation and loneliness by considering interventions such as a discretionary travel voucher scheme in appropriate circumstances where there is hardship. In essence we will continue to monitor the crisis and respond accordingly.

### **The 5 Point Plan**

- 4.26 The measures we are bringing together, and introducing, can be listed under the following 5 Points:

#### **Cost of Living:**

- 1) Co-ordinating Government Support to ensure it reaches those people who need it.
- 2) Exercising discretion when providing welfare support and advice to support those people who could potentially fall on hard times.

- 3) Maximise partnership working and established systems to provide targeted support in localities where there is a particular trend and need, implementing a targeted ‘family-first approach’.

**Preventing Crisis:**

- 4) Maintain Good Health – whether that be referrals for mental health support, discounts at our gyms and swimming pools, promotion of free local exercise activities and sports clubs, engaging in community-led “wellbeing” initiatives, volunteering and socialising via local initiatives.
- 5) Access to food and nutrition – whether that be participating in healthy eating exercises/initiatives, organising a community garden to grow produce, setting up a Community Larder or providing extra support to local food banks to meet any unmet need.

**6) LINKS TO CORPORATE PLAN**

- a. The joint Corporate Plan is designed to address the challenges and provide opportunities for the wellbeing of our communities. Its vision is to have ‘Great communities with bright and healthy futures that everyone is proud to call home’.
- b. The joint Corporate Plan is underpinned by six strategic priorities. The 5 Point Plan seeks to support ambitions that cut across all six strategies.

**7) LEGAL IMPLICATIONS**

- a. There are no legal implications associated with this report.

**8) RISK MANAGEMENT**

Risk Description	Likelihood	Impact	Mitigation Measures
Those most vulnerable and in most need do not receive the support they need	Medium	High	Co-ordinating and promoting Government support to ensure that available help gets to those people who need it.  Exercising discretion when providing welfare support and advice to support those people who could potentially fall on hard times.
Support provided to our communities and those most in need is not	Medium	High	Maximise partnership working and established systems to provide targeted support in localities where there is a particular trend and need, implementing a

sufficient, aligned or coordinated.			targeted 'family-first approach'.  Appointment of a dedicated Cost of Living officer to co-ordinate work and maintain strong partnership arrangements.
The impacts of the Cost of Living Crisis reduces the overall wellbeing and resilience of our communities	Medium	High	Continued support for communities to maintain good health – whether that be referrals for mental health support, discounts to our gyms, engaging in community-led “wellbeing” initiatives, volunteering and socialising via local initiatives.  Continued support for communities to access food and nutrition – whether that be participating in healthy eating exercises/initiatives, organising a community garden to grow produce, setting up of a Community Pantry or providing extra support to local food banks to meet any unmet need.

## 9) CONSULTATIONS

- a. A number of Member briefings have already taken place where the 5 point plan has been shared, most recently at an all Member briefing on 28<sup>th</sup> April 2022.
- b. Discussions have also taken place with partners including Health Partners, advisory services and the Suffolk Collaborative Communities Board.
- c. There have been internal officer discussions with the Senior Leadership Team, Finance, Housing, Shared Revenues Partnership, Communities and Customer Services.

## 10) EQUALITY ANALYSIS

- A. There is no requirement to complete an EQIA at this time. The plan is intended to tackle and prevent inequalities and these will be monitored by the pulling together of the data set under point 2 of the plan.

## 11) ENVIRONMENTAL IMPLICATIONS

- a. There are no environmental implications directly associated with this report.

## **12) FINANCIAL IMPLICATIONS**

- a. Costs and funding for each task are set out in the action plan. At this stage, the action plan does not require additional funding from the council over and above that already set aside in the budgets for 2022/23. The availability of the range of external funding sources referenced in the action plan at Appendix One of this report, including the new Cost of Living Co-ordinator post, is noted.

## **13) BACKGROUND DOCUMENTS**

Meeting pack for Suffolk Health and Wellbeing Board Agenda – 12 May 2022 (with specific note to the cost of living report, including tackling poverty action plan) [Meeting Documents - Committee Minutes \(suffolk.gov.uk\)](#)

## **14) REPORT AUTHORS**

Nadeem Murtuja, Assistant Director for Communities and Wellbeing

Vicky Moseley, Corporate Manager for Communities

Samantha Lake, Corporate Manager for Customer Operations

# Agenda Item 10

## BABERGH DISTRICT COUNCIL

<b>COMMITTEE: CABINET</b>	<b>REPORT NUMBER: BCa/22/4</b>
<b>FROM: CLLR JOHN WARD LEADER</b>	<b>DATE OF MEETING: 8<sup>th</sup> June 2022</b>
<b>OFFICER: EMILY ATACK ASSISTANT DIRECTOR - ASSETS AND INVESTMENTS</b>	<b>KEY DECISION REF NO. CAB355</b>

### BABERGH FORMER HQ SITE DEVELOPMENT

#### 1. PURPOSE OF REPORT

- 1.1 This report provides an update and review of the redevelopment of the former HQ Site in Hadleigh, because of significant market changes in the construction sector, it is no longer possible to start on site in July 2022 as intended. A copy of the development plan is attached as appendix A, showing the main phases.
- 1.2 This report reviews the options available at this time and recommends option 2 is progressed, increasing the peak debt to £7m so that phase 1 of the development can commence prior to the expiry of the planning consent in September 2022. Phase 2 will be reviewed further following progress of phase 1.

#### 2. OPTIONS CONSIDERED

The options that have been considered are: -

##### 2.1 Option 1 – Freehold Disposal of the site.

The Council could look to sell the HQ site on the open market with the benefit of planning consent, however the planning consent is due to lapse if not implemented by September 2022. Informal marketing advice has been received recently which identified a negative land value based on the current planning consent but suggests that a maximum gross capital receipt of circa £500,000 could potentially be achieved. It is likely that any third party would seek to increase the density of the scheme and to mitigate the costs of development, which could result in a less favourable scheme than currently consented.

Whilst this option would enable the Council to receive a capital receipt this would need to be offset against development costs incurred by Babergh Growth to date (circa £320k) and any future control over the delivery of the site could only be gained through the Council's regulatory powers. This would not guarantee that development would be forthcoming in the near future, as seen with other former HQ sites across the County.

## **2.2 Option 2 – Increase Peak Debt Threshold to align with current market conditions**

In December 2018, Cabinet and Council approved capital funding of £3.77m against the development capital expenditure costs of £12.8m. Current development capital expenditure following tendering the works is anticipated to be £11m for phase 1 and likely to exceed £12.8m for both phases due to significant price inflation in the construction market.

Due to market changes it is no longer possible to deliver the development within the authorised peak debt threshold. The authorised peak debt threshold would need to increase to £7m to progress the scheme. Increasing the peak debt threshold would enable the build contract to be awarded for phase 1 before the expiry of the tender period, thus reducing further potential for price increases and a start on site to occur before the expiry of the planning in September 2022.

Phase 1 is currently forecast to make a small loss (£250k) but potentially could break even if the construction contingency isn't required. Phase 1 would provide 41 new homes. Phase 2 would be reviewed once phase 1 has progressed, to manage exposure to market conditions. Phase 2 comprises two elements, 4 properties on Corks Lane (Phase 2a) which is anticipated to deliver a profit of £300,000, and 4 properties on Bridge Street (Phase 2b) which need to be reviewed further and as such for this purpose we are currently taking a cautious approach and assuming no profit attached to these properties. On this basis Phase 1 and phase 2a currently show a break-even development with the potential for a small profit (c. £50-100k), further profit could subsequently be available from phase 2b.

### **Option 3 – Progress Phase 1 with lower peak debt threshold by agreeing to deliver 13 properties to the Housing Revenue Account (HRA) for affordable housing.**

The scheme could be delivered within a peak debt threshold of £5.25m if 13 properties are delivered to the HRA for affordable housing. The HRA would pay for the properties on a drawdown basis against works completed on site (similar to the process for acquiring S106 homes on other schemes). This would improve the cashflow of the development and reduce the need to increase the peak debt threshold to the full amount set out in option 2, however this would reduce the viability of the development further.

The affordable properties would cost the HRA in the order of £2.7m (build cost) this shows a negative Net Present Value of c.£500,000 for the HRA, ordinarily the HRA only acquires/builds units which show a positive Net Present Value. This option would however deliver much needed modern affordable properties in the heart of Hadleigh.

The Council delivered Angel Court, in Hadleigh, a fully affordable scheme, providing 19 homes last year, providing a mix of affordable rent and shared ownership homes. All of the shared ownership homes have now been sold or reserved and the scheme is well occupied.



Allocating 13 homes for affordable purposes within the scheme would reduce the viability of the scheme further and would result in a loss of approximately £250,000. This is therefore unlikely to be a viable option without further subsidy.

### **2.3 Option 4 – Do Nothing**

This is not a viable option. The property has been vacant since 2017 and would be an under-utilised asset if no further actions were progressed. There is full time security on site to mitigate the risks of anti-social behaviour in the area. The costs for security are approximately £110,000 p.a.

The property is not capable of being occupied without considerable expenditure and as such doing nothing would result in the property remaining vacant and under-used. It would fail to deliver any benefits either financial, social or economic for the community and increasingly become a magnet for anti-social behaviour with further deterioration of the listed buildings within the property.

The recommended option to enable housing delivery at the former HQ site within Hadleigh, is Option 2. This option enables the Council to deliver housing in a timely manner prior to the expiry of the tender validity period and planning consent and mitigate further construction cost increases in a highly inflationary construction market. It will control the quality of the housing and support further housing delivery within the district.

### **2.4 Option 5 – Alternative phasing of development to minimise peak debt threshold**

Alternative phasing has been considered including extending the period of construction to keep the peak debt below the agreed threshold, however this is not a viable option as contractors will not agree to a fixed price on this basis and there would be increased costs of site set up for the longer period as well as inflationary pressures, which could result in significant losses for Babergh Growth and its shareholder and ultimately would delay the completion of the whole development.

### **2.5 Option 6 – Alternative mixed-use development**

Alternative developments have been considered including retaining some office/commercial uses within the development. Office/commercial uses would require more car parking to be delivered to serve this use compared to residential units and as such this would reduce the overall built area and the gross development value of the scheme, whilst build costs would be high in terms of creating additional car parking and refurbishing and upgrading any commercial space to meet current standards. This option is less financially viable than the current consented scheme, a high-level appraisal has indicated a negative return to the shareholder in the order of minus

£1.4m, compared to breakeven or small return if phase 1 and 2a are delivered as set out in option 2 above.

An alternative development could not be delivered under the current planning consent and as such a new planning application would need to be submitted. Progressing this option would delay any start on site for at least a further circa 12 months whilst the scheme was re-designed, consulted on and planning obtained as well as incurring further professional fees and holding costs. Due to the current market conditions any alternative scheme would also require an increased peak debt threshold. This option is therefore not viable at the current time.

### **3. RECOMMENDATIONS**

#### **That Cabinet :-**

- 3.1 Approves the increase in peak funding threshold for Babergh Growth Ltd to £7m for use to deliver the redevelopment of the former HQ site in Hadleigh.
- 3.2 Authorises the Section 151 Officer, in consultation with the Monitoring Officer and the Leader, to negotiate and vary the necessary legal agreements between Babergh District Council and Babergh Growth Ltd to enable the delivery of housing on the former HQ site within Hadleigh.

#### **REASON FOR DECISION**

To enable and support the delivery of housing within the district and support the economic prosperity of Hadleigh as a key market town.

### **4. KEY INFORMATION**

- 4.1 In September 2016 Full Council made the decision to relocate from the HQ buildings at Corks Lane, Hadleigh to Endeavour House as the current HQ was not fit for purpose to fulfil modern local government functions with Mid Suffolk District Council.
- 4.2 In April 2017 Executive Committee gave approval for the appointment of a design and planning team following a full and compliant procurement process. The appointment of the design and planning team was required to support the team with developing options for the future use of the existing headquarter building and associated car park sites at Corks Lane Hadleigh and to develop a programme of work which will ensure the successful delivery of a developed design for the site, that would enable the determination of a detailed planning application for the site.
- 4.3 In December 2018 Babergh Cabinet and Council agreed to setting up a Commercial Joint Venture Vehicle to deliver the redevelopment of the former HQ building and agreed a peak debt loan facility of £3.77m to the commercial vehicle for this purpose. This peak debt threshold was based on the options

appraisal and estimated construction cost at that time. Babergh Growth Limited was incorporated in March 2019. The summary of the original business case background is illustrated in Appendix C.

- 4.4 The Development Agreement and Finance Agreements between Babergh District Council and Babergh Growth Limited were completed in March 2021, following the receipt of planning consent. To date £319,117.74 plus VAT has been paid to Babergh Growth Ltd in line with the development agreement to cover additional design and planning fees and further site and building surveys required to bring forward the development.
- 4.5 There were considerable delays in achieving planning consent for the redevelopment of the site due to negotiations with third parties in relation to the adjacent cricket club site and the necessary mitigation measures required to ensure the sites could coexist successfully. Planning consent was granted in March 2021. However further planning amendments were required to deliver a market facing and deliverable scheme. Planning consent for the amended phase 1 scheme (49 units) was achieved in February 2022. The original planning consent has an 18 month start on site provision- requiring start on site by 9<sup>th</sup> September 2022.
- 4.6 The whole development comprises 57 new homes (23 new build and 33 converted within the existing building) providing 20 one bed homes, 20 two bed homes 10 three bed homes, 5 four bed homes and 2 five bed homes. The development has been split into two principal phases, the first being the delivery of the main HQ site comprising the main conversion and the second being new build properties at Corks Lane and Bridge Street.
- 4.7 Phase 1 of the scheme was tendered by Babergh Growth earlier this year following the receipt of the necessary planning amendments and listed building consents. Tender returns were analysed by Babergh Growth Company QS team and a recommendation to appoint the main contractor was made at the March board meeting. This was agreed by Directors subject to exploring phasing and cashflow drawdowns against the Council's peak of £3.77m to ensure the scheme was deliverable prior to appointing the contractor.
- 4.8 We are currently experiencing significant inflationary market pressures in the construction sector because of Brexit, the pandemic, rising inflation, and the war in Ukraine. This means that we are in a period of rapidly increasing costs, supply chain issues and uncertainty from the market.
- 4.9 The market has unfortunately changed considerably over the past few months with many contractors not engaging in competitive tendering or offering fixed price contracts. This has been completely unprecedented and mean that previous methodologies of phasing and controlling the flow of construction are now subject to either limited buy-in from the contracting market or are associated with the risk of inflation. This has resulted in a significant change of approach in the construction market.

- 4.10 Following the March board meeting, Babergh Growth Limited entered discussions with the preferred contractor and were exploring the potential content and value of a Letter of Intent to enable them to secure initial materials and make a start on site. Unfortunately, during these initial discussions, it became clear from the main contractor's supply chain that the quotations offered in the tender period had expired and given the significant and unforeseen inflationary pressures on the market, the sub-contractors, would not stand by their original tenders.
- 4.11 This resulted in an increase tender cost of c.£680,000. Babergh Growth have managed to identify opportunities to mitigate this increase, however, reviewing the contractors initial phasing plan against the cashflow, this exceeded Babergh Growth authorised peak debt threshold. Alternative phasing has been considered including extending the period of construction to keep the peak debt below the threshold, however the contractor will not agree to a fixed price on this basis and there would be increased costs of site set up for the longer period as well as inflationary pressures, which could result in significant losses for Babergh Growth and its shareholder.
- 4.12 Babergh Growth is therefore unable to award the construction contract at the current time as they do not have funds secured to deliver the project and are therefore seeking an increase in the peak debt threshold. The Contractor is only able to hold their current price until 10<sup>th</sup> June.

## **5. LINKS TO JOINT CORPORATE PLAN**

- 5.1 The development of the former HQ site in Hadleigh supports the joint corporate plan by delivering new homes and supporting our local towns to thrive.

## **6. FINANCIAL IMPLICATIONS**

- 6.1 The delivery of phase 1 of the Hadleigh former HQ scheme in line with option 2 outlined above requires total funding of approximately £11m over this phase of the scheme's development, with a peak cashflow required of £7m.
- 6.2 The funding required to meet the peak cashflow is through a loan to Babergh Growth. The Council will loan the company finances at 2% above base rate, in line with the current funding arrangements. The additional funding required to increase the peak debt threshold is within the approved capital programme, £3.66m for Babergh Growth and former HQ site and the remainder from the £6.3m approved regeneration fund.
- 6.3 **Table 1 - Cost of borrowing**

	<b>Total £'000</b>	<b>2021/22 £'000</b>	<b>2022/23 £'000</b>	<b>2023/24 £'000</b>	<b>2024/25 £'000</b>
<b>Loan Amount</b>	<b>7,000</b>	<b>319</b>	<b>2,227</b>	<b>2,227</b>	<b>2,227</b>
<b>Cumulative Loan Balance</b>		<b>319</b>	<b>2,546</b>	<b>4,773</b>	<b>7,000</b>
<b>Borrowing Costs (2.22%)</b>	325	7	57	106	155
<b>Loan Repayment (4.22%)</b>	-618	- 13	- 107	- 201	- 295
<b>Net Profit</b>	<b>-291</b>	<b>-6</b>	<b>-50</b>	<b>-95</b>	<b>-140</b>

6.4 The proposed funding arrangement, as detailed above, demonstrates the profiling of the funds required to deliver the Hadleigh former HQ redevelopment scheme. The Council will benefit through the provision of funds, in the form of a loan, to Babergh Growth a total income of £291K over the 4yr period. This interest is a development cost and if the scheme fails to make a profit will need to be absorbed by the Council.

6.5 The delivery of this development scheme via Babergh Growth offers wider financial benefits to the public purse. These are set out in Appendix B and includes the original 2018 estimate and implications of options 1,2 &3.

## 7. LEGAL IMPLICATIONS

7.1 The Council entered into development and facility agreements with Babergh Growth Limited in March 2021 and as such there are legal contracts in place to provide the legal framework for this relationship. Babergh Growth Limited is a Joint Venture company between Babergh District Council and Norse Group.

7.2 The development of the Former HQ site is to be fully funded by Babergh District Council and any capital receipts will be retained by the Council. The objective of the development agreement is to deliver the development without incurring any losses. The development agreement can be terminated by the Council subject to all outstanding costs being paid. To date approximately £320,000 has been paid to Babergh Growth for consultancy fees.

## 8. RISK MANAGEMENT

8.1 Key risks are set out below:

<b>Risk Description</b>	<b>Likelihood</b>	<b>Impact</b>	<b>Score</b>	<b>Mitigation Measures</b>
If we didn't explore fully the development options for the former HQ site, and other sites, the Council may not achieve the	(2)	(2)	(4)	The recommended option will deliver high quality housing, in the most timely manner now that the scheme is in

best economic, social and financial outcomes.				a deliverable position.
Increasing the peak debt from £3.77m to £7m could result in other corporate growth priorities being potentially delayed until the debt is repaid. NB: there is no increase to the Council's planned debt, it is utilising the planned borrowing from the Babergh Growth Capital allocation within the approved Capital Programme.	(2)	(2)	(4)	The growth company would use the debt funding on the projects for open market housing for sale and as such this is a short-term borrowing facility. The Growth Company will pay interest for the loan.
Other project risks:				
Continued construction cost inflation	(2)	(3)	(6)	Progress scheme in phases and review each phase and market prior to progressing. Phases to be tendered separately. Phase 1 fully tendered and updated fixed price available until 10 <sup>th</sup> June.

There is a market downturn which means that the viability position is altered for the project.	(2)	(3)	6	The Council could consider holding properties for private rent whilst the market recovers.
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## 9. CONSULTATIONS

9.1 The approach that is being recommended within this report has been consulted on with the board members of Babergh Growth Limited.

## 10. EQUALITY ANALYSIS

10.1 Equality Impact Assessment (EIA) is not required as there are no equality issues arising from the contents of this report and the recommendations.

## 11. ENVIRONMENTAL IMPLICATIONS

11.1 The recommended option allows the Council to take control of environmental factors in the design and build of the proposed new housing and development facilities within the district.

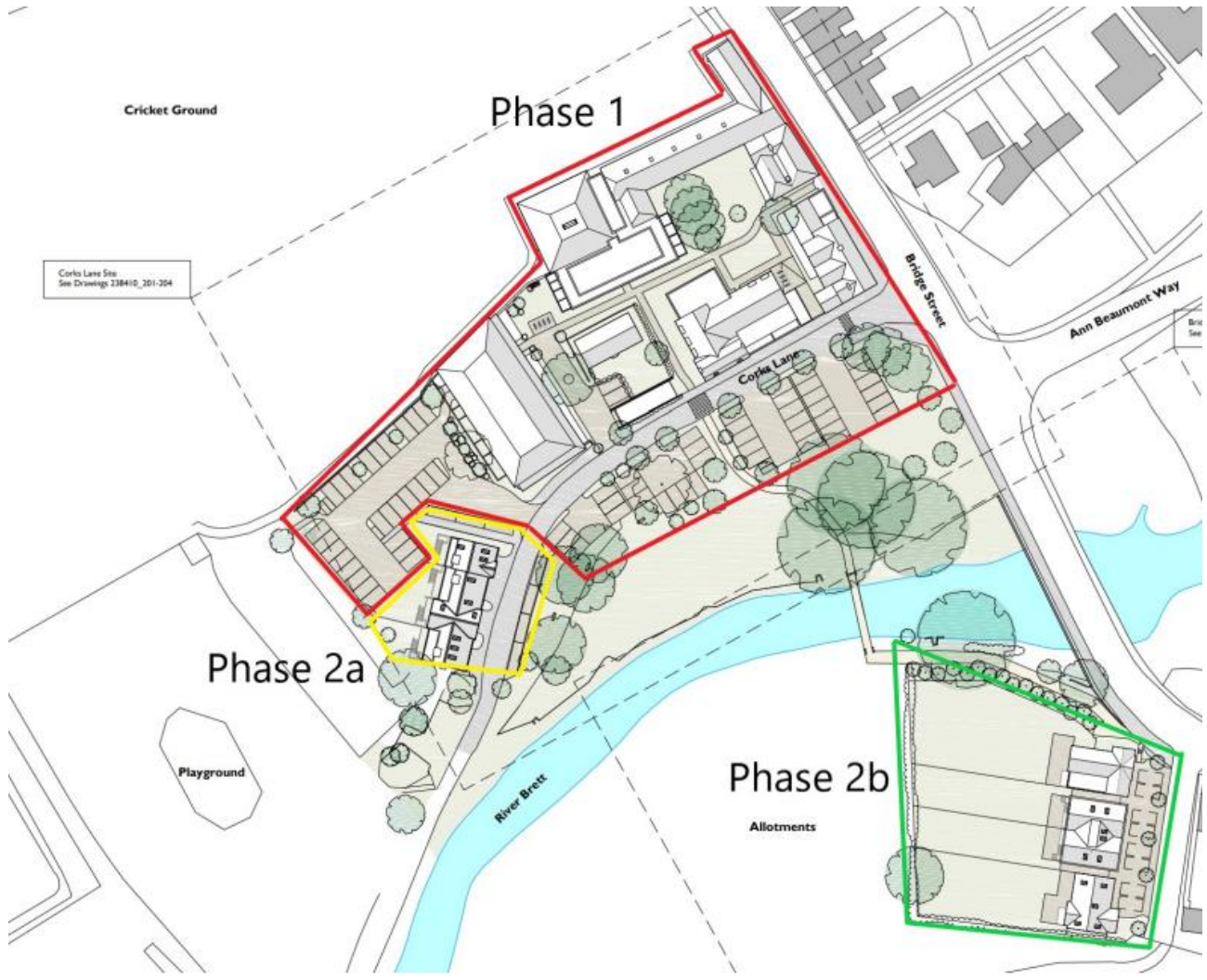
11.2 The scheme will benefit from a district heating network, meaning that all buildings are connected to a central source for heating and hot water. This can help to lower carbon emissions for the whole development and provide savings against energy bills and maintenance for residents. Due to the plant being centralised, space within properties can be optimised, creating better spaces for living.

11.3 Undertaking full refurbishment of the existing buildings will improve their efficiency and ensure they meet current building regulations, for example through enhanced insulation. The new build elements of the development will be built using a fabric first approach to optimise sustainability of the homes.

## 12. APPENDICES

Title	Location
(a) Development Plan- Phases	Attached
(b) Estimated return to the public purse appraisal	Attached

# APPENDIX A





## **APPENDIX B**

	<b>2018</b>	<b>2022</b>	<b>2022</b>	<b>2022</b>
	<b>Estimate</b>	<b>(Option 1)</b>	<b>(Option 2)</b>	<b>(Option3)</b>
Community Infrastructure Levy to BDC	£196k	Unknown	£200k	£200k
Receipt of Council tax [annual] to BDC	£86k (pa)	Unknown	£91k (pa)	£91k (pa)
New Homes Bonus to BDC	£97k (pa)	Unknown	£97k (pa)	£97k (pa)
Income to BDC Building Control & Planning	£61k	£24k (to date)	£61k	£61k
Shareholder profit to BDC (100%Share)	£866k	£0	£0	-£250k
Land value to BDC	£0k	£170k	£0k	£0
Private rent income	£TBC	N/A	N/A	N/A
Interest on loan repayments to BDC	£104k	N/A	£291k*	£105k*
<b>TOTAL</b> [return to the public purse]	<b>£1.400M</b>	<b>£0.19m</b>	<b>£0.74m</b>	<b>£0.3m</b>
<b>TOTAL</b> (without interest repayments)	<b>£1.3m</b>	<b>£0.19m</b>	<b>£0.45m</b>	<b>£0.2m</b>
*payable with breakeven/ profitable scheme only				

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