



## AGENDA

### COUNCIL MEETING

**WEDNESDAY, 20TH MARCH 2024 – 5.30 PM**

---

Members of the Council are summoned to a meeting of the Mid Suffolk District Council at King Edmund Chamber, Endeavour House, 8 Russell Road, Ipswich on Wednesday, 20th March, 2024 at 5.30 pm.

**Note – there will be a Presentation and Q&A session on the proposed Devolution Deal for Suffolk: <https://www.suffolk.gov.uk/council-and-democracy/devolution> at 5.30pm before the meeting formally commences.**

A handwritten signature in black ink, appearing to read 'Arthur Charvonja'.

Arthur Charvonja  
Chief Executive

---





<b>MSDC COUNCIL</b>	
<b>DATE:</b>	<b>WEDNESDAY, 20 MARCH 2024 5.30 PM</b>
<b>VENUE:</b>	<b>KING EDMUND CHAMBER, ENDEAVOUR HOUSE, 8 RUSSELL ROAD, IPSWICH</b>

This meeting will be broadcast live to YouTube and will be capable of repeated viewing. The entirety of the meeting will be filmed except for confidential or exempt items. If you attend the meeting in person, you will be deemed to have consented to being filmed and to the possible use of the images and sound recordings for webcasting/ training purposes.

The Council, members of the public and the press may record/film/photograph or broadcast this meeting when the public and the press are not lawfully excluded.

**PART 1  
MATTERS TO BE CONSIDERED WITH THE PRESS AND PUBLIC PRESENT**

Page(s)

**1 APOLOGIES FOR ABSENCE**

To receive apologies for absence.

**2 DECLARATION OF INTERESTS BY COUNCILLORS**

**3 MC/23/43 TO CONFIRM THE MINUTES OF THE MEETING HELD ON 22 FEBRUARY 2024** 7 - 20

**4 MC/23/44 CHAIR'S ANNOUNCEMENTS** 21 - 22

**5 LEADER'S ANNOUNCEMENTS**

**6 TO DEBATE THE PROPOSED SUFFOLK DEVOLUTION DEAL**

To debate the [proposed devolution deal for the county](#) to enable the Leader to formulate a response to Suffolk County Council.

**It is RECOMMENDED:**

**To delegate authority to the Leader of the Council to collate the views of the Council and respond to Suffolk County Council.**

- 7        **TO RECEIVE NOTIFICATION OF PETITIONS IN ACCORDANCE WITH COUNCIL PROCEDURE RULES**
- In accordance with Council Procedure Rule 11, The Chief Executive will report the receipt of any petitions. There can be no debate or comment upon these matters at the Council meeting.
- 8        **QUESTIONS BY THE PUBLIC IN ACCORDANCE WITH COUNCIL PROCEDURE RULES**
- The Chair of the Council to answer any questions by the public of which notice has been given no later than midday three clear working days before the day of the meeting in accordance with Council Procedure Rule No. 12.
- 9        **QUESTIONS BY COUNCILLORS IN ACCORDANCE WITH COUNCIL PROCEDURE RULES**
- The Chair of the Council, Chairs of Committees and Sub-Committees and Portfolio Holders to answer any questions on any matters in relation to which the Council has powers or duties or which affect the District of which due notice has been given in accordance with Council Procedure Rule 13.
- 10       **MC/23/45 COMMUNITY INFRASTRUCTURE LEVY (CIL) - CIL EXPENDITURE FRAMEWORK SIXTH REVIEW - MARCH 2024**       23 - 118
- Cabinet Member for Heritage, Planning and Infrastructure
- 11       **MC/23/46 JOINT HOMELESSNESS REDUCTION AND ROUGH SLEEPING STRATEGY 2024**       119 - 256
- Cabinet Member for Housing and Property
- 12       **MC/23/47 COMMUNITY GOVERNANCE REVIEW - BATTISFORD AND COMBS**       257 - 308
- Head of Electoral Services and Land Charges
- 13       **MC/23/48 DESIGNATION OF THE SECTION 151 OFFICER ROLE**       309 - 312
- Chief Executive
- 14       **MC/23/49 REVISED PAY POLICY STATEMENT**       313 - 324
- Leader of the Council



15      **COUNCILLOR APPOINTMENTS**

To agree the following appointments:

**Suffolk Joint Standards Board**

Lavinia Hadingham

**Council Investment Portfolio Working Group**

John Whitehead

1 x Lib Dem TBC

16      **MOTIONS ON NOTICE**

**Date and Time of next meeting**

Please note that the next meeting is scheduled for Thursday, 25 April 2024 at 5.30 pm.

**Webcasting/ Live Streaming**

The Webcast of the meeting will be available to view on the Councils Youtube page:

[https://www.youtube.com/channel/UCSWf\\_0D13zmegAf5Qv\\_aZSg](https://www.youtube.com/channel/UCSWf_0D13zmegAf5Qv_aZSg)

For more information about this meeting, including access arrangements and facilities for people with disabilities, please contact the Committee Officer, Committee Services on: 01473 296472 or Email: [Committees@baberghmidsuffolk.gov.uk](mailto:Committees@baberghmidsuffolk.gov.uk)

### **Introduction to Public Meetings**

Babergh/Mid Suffolk District Councils are committed to Open Government. The proceedings of this meeting are open to the public, apart from any confidential or exempt items which may have to be considered in the absence of the press and public.

### **Domestic Arrangements:**

- Toilets are situated opposite the meeting room.
- Cold water is also available outside opposite the room.
- Please switch off all mobile phones or turn them to silent.

### **Evacuating the building in an emergency: Information for Visitors:**

If you hear the alarm:

1. Leave the building immediately via a Fire Exit and make your way to the Assembly Point (Ipswich Town Football Ground).
2. Follow the signs directing you to the Fire Exits at each end of the floor.
3. Do not enter the Atrium (Ground Floor area and walkways). If you are in the Atrium at the time of the Alarm, follow the signs to the nearest Fire Exit.
4. Use the stairs, not the lifts.
5. Do not re-enter the building until told it is safe to do so.

# Agenda Item 3

## MID SUFFOLK DISTRICT COUNCIL

Minutes of the meeting of the **MSDC COUNCIL** held in the King Edmund Chamber, Endeavour House, 8 Russell Road, Ipswich on Thursday, 22 February 2024

### PRESENT:

Councillor: Rowland Warboys (Chair)  
Dr Daniel Pratt (Vice-Chair)

Councillors:	David Bradbury	Terence Carter
	James Caston	Teresa Davis
	Rachel Eburne	Lucy Elkin
	Nicholas Hardingham	Matthew Hicks
	Terry Lawrence	Colin Lay
	Anders Linder	Sarah Mansel
	Adrienne Marriott	John Matthissen
	Andrew Mellen	Gilly Morgan
	Jen Overett	James Patchett
	Janet Pearson	David Penny
	Miles Row	Keith Scarff
	Andrew Stringer	Ollie Walters
	Tim Weller	John Whitehead
	Nicky Willshere	Richard Winch

### In attendance:

Officers: Chief Executive (AC)  
Interim Monitoring Officer (JR)  
Director – Planning & Building Control (TB)  
Director – Corporate Services (SW)  
Head of Service – Strategic Policy (JH)  
Head of Service – Housing Solutions (AA-Y)  
Head of Service - Finance, Commissioning & Procurement (KW) – hybrid  
Shared Revenues Partnership – Operations Manager (AW)  
Assistant Manager – Financial Accountant (MH) – hybrid  
Senior Finance Business Partner (SC)  
Finance Business Partner – HRA (JS)  
Assistant Manager - Governance (HH)

**Apologies:** Austin Davies  
Lavinia Hadingham  
David Napier  
Dr Ross Piper

## 97 DECLARATION OF INTERESTS BY COUNCILLORS

97.1 The Monitoring Officer granted a dispensation for all Councillors with regard to the budget papers.

97.2 Councillor Mansel declared an interest as an owner of a second property in the district.

**98 MC/23/38 TO CONFIRM THE MINUTES OF THE MEETING HELD ON 25 JANUARY 2024**

98.1 Councillor Weller raised that in points 87.4 and 87.7 references to 4g pitches should be amended to read *3g pitches*.

98.2 Councillor Lay raised that paragraph 74.4 should be amended to read *Councillor Andrew Stringer and Councillor Colin Lay declared an interest as Directors of Gateway 14*.

98.3 Councillor Lawrence questioned the accuracy of the wording of paragraph 87.11.

98.4 It was agreed that this paragraph be changed to read: - Councillor Lawrence welcomed that the Council had done financial balances between 5g and 3g pitches and similar considerations of financial costs should be used when considering third parties in the future.

**It was RESOLVED:-**

**That subject to the proposed amendments being added to the Minutes, the Minutes of the meeting held on 25 January 2024 be confirmed and signed as a true record.**

**99 LEADER'S ANNOUNCEMENTS**

99.1 The Chair invited the Leader, Councillor Mellen, to make the following announcements.

**1. Shortlisted for UK Council of the Year**

I am delighted to announce that Babergh & Mid Suffolk Councils have been named as a finalist for UK Council of the Year at the prestigious iESE Public Sector Transformation Awards 2024.

This is a fantastic recognition for the hard work, innovation and dedication of officers and the progress the organisation has made over the last few years. We can all take pride in this nomination. Although we face many challenges in local government, our officers go the extra mile to deliver for residents and communities.

The awards ceremony is on 6 March in London, and I am sure we all have our fingers crossed. I would also like to congratulate our Building Control team, who have won a national industry award for their work on Black Pheasant Barn in Sudbury.

## **2. Getting the phones answered**

I am also happy to report an improvement in one important area of our customer service. Getting the council's phones answered without long delays was an issue that regularly came up on the doorsteps during last year's election campaign. Our target is to answer phone calls to the council in 1min 45 seconds, and the average wait has been coming down over recent months. So far in February phones have been answered on average in 1 min 9 seconds, an above target performance. I would like to thank Sara Wilcock, Sam Lake and the team for their efforts in achieving this.

## **3. Deadline for locality awards**

I am sure all councillors are aware, but I would like to remind you that we have until 22 March to spend any remaining locality award budgets. These are not carried over so do make sure your funds have been allocated.

Our website contains guidance as to how locality funding can be spent, including the full eligibility criteria and a breakdown of eligible projects. Also, the grants team stand ready to assist and advise members so that the funding gets out there to support community projects and initiatives.

At the end of the financial year, our communications team will be doing a broad celebration of all the ways in which you all have helped communities using the awards.

## **4. Retrofit solutions conference**

Finally, I would like to raise awareness of a free event focused on making Suffolk's older homes more energy efficient, which takes place at The Hold in Ipswich on 6 March.

The Retrofit Solutions Conference is open to homeowners, landlords and building professionals. It will feature case studies and expert advice on providing innovative retrofit solutions to help increase energy efficiency in properties of all types. You can sign up on the Green Suffolk website.

### **100 TO RECEIVE NOTIFICATION OF PETITIONS IN ACCORDANCE WITH COUNCIL PROCEDURE RULES**

100.1 None received.

### **101 QUESTIONS BY THE PUBLIC IN ACCORDANCE WITH COUNCIL PROCEDURE RULES**

101.1 None received.

### **102 QUESTIONS BY COUNCILLORS IN ACCORDANCE WITH COUNCIL PROCEDURE RULES**

102.1 None received.

## **103 MC/23/39 EMPTY HOMES AND SECOND HOMES POLICY**

- 103.1 The Chair invited Councillor Winch, Cabinet Member for Housing & Property to introduce the report.
- 103.2 Councillor Winch introduced the report and proposed the recommendations. Councillor Walters seconded this motion.
- 103.3 Councillor Caston questioned how susceptible the Council was to fraudulent second home exemption claims. Councillor Winch responded that the Council was already looking into this and whilst some exemptions were not clear, all applications had to be reviewed. The Shared Revenues Partnership Operations Manager added that processes were already in place and that data matching with other organisations was used to determine activity of properties and if fraud was suspected the application would be referred to the internal fraud team.
- 103.4 Councillor Patchett queried where second homes that were rented out infrequently fell under the scheme. Councillor Winch responded that to classify as a business, the home had to be let for a minimum of 70 days per year and had to be available to be rented for 140 days of the year.
- 103.5 Councillor Caston questioned whether it had been considered if people needed to leave their homes due to education and left them empty. Councillor Winch responded that the detailed list of exemptions had not been published. The Shared Revenues Partnership Operations Manager added that owners of second properties would be written to enquire into their circumstances and the Council had the ability to waive premiums under exceptional circumstances if required.
- 103.6 Councillors debated the issues including whether the policy would have an impact on housing availability in the district, and the fairness of the scheme.

By 29 votes for and 1 against.

**It was RESOLVED: -**

- 1.1 That Council approve the empty homes and second homes premiums policy for 2024-25 attached in appendix A.**
- 1.2 That Council delegate authority to the Director of Housing in consultation with the Cabinet Member for Housing and Property to make technical amendments to the policy to ensure it meets the criteria set by Government and the Council.**

## **104 MC/23/40 GENERAL FUND BUDGET 2024-2025 AND FOUR-YEAR OUTLOOK**

- 104.1 The Chair invited Councillor Eburne, Cabinet Member for Finance and Resources, to introduce the report.

- 104.2 Councillor Eburne introduced the report and proposed the recommendations. Councillor Mellen seconded this motion.
- 104.3 The Chair invited Councillor Whitehead to introduce the amendment as detailed in the tabled papers.
- 104.4 Councillor Whitehead proposed the budget amendments as set out in the tabled papers. Councillor Caston seconded this amendment.
- 104.5 Councillor Eburne rejected the amendment.
- 104.6 Councillor Lawrence outlined the borrowing debt currently owed by the Council and stated that he did not support the amendment due to these debts.
- 104.7 Councillor Hicks supported the amendment and highlighted the surplus that the Council had along with the dividend from Gateway 14 and how a rise in Council Tax could affect residents.
- 104.8 Councillor Mellen outlined that the administration did not approve of the amendment as whilst the Council were in a good financial position the future was uncertain. He highlighted that the raise in Council Tax was below the inflation rate and would prevent larger increases in the future.
- 104.9 Councillor Winch outlined the mandate the Council had for community lead projects and how collaboration between communities and the Council was necessary to undertake projects.
- 104.10 Councillor Linder stated that he did not support a raise in Council Tax during the Cost of Living Crisis.
- 104.11 Councillor Davis outlined that when there were inflation rates of 6% in 2022, and 10% in 2023 the Council did not increase Council Tax and this impacted the real value of the council tax collected, so an increase of 2% now was modest recovery. Additionally, the Council Tax increase from the Council was at a lower level than at other levels of government.
- 104.12 Councillor Stringer outlined that the amendment was a short-term solution and unpredictable impacts from external sources could be mitigated by the rise in Council Tax and surpluses should be used to provide value for money in Council services. He added that small increases to Council Tax gave a greater stability to the Council and would allow the Council to put residents first.
- 104.13 Councillor Caston outlined that the proposed working group would be open to any option and as the Council was in a good position it would be good to give back to residents.

- 104.14 Councillor Scarff stated that he supported small increases in Council Tax within the base budget, and he raised concern on the uncertainty of one year funding from Central Government and how this meant long-term financial security was unpredictable.
- 104.15 Councillor Row outlined that in the long term the increase of Council Tax would benefit residents and decrease their costs as it would increase their access to Council services.
- 104.16 Councillor Patchett outlined that he had been reassured by Cabinet on the Council Tax rises and that due to the current inflation rates valuations on CIFCO could be uncertain in future.
- 104.17 Councillor Whitehead outlined that the proposed working group would have been politically balanced giving the administration a greater voice, additionally he outlined that the Gateway 14 dividend was the difference on previous years and put the Council in a greater financial position that could give back to residents.
- 104.18 Councillor Eburne thanked the opposition for their amendment and highlighted that the raise in council tax was for sustainability and would inhibit future service delivery if there was not an increase. She added that the Council wanted to be open and honest about the Gateway 14 dividend despite not knowing the amount or when it would be paid. She added that collaborative cross-party working had been used in the development of long-term strategies.

**In accordance with Council Procedure Rule 19.3, the vote was recorded as follows:**

<b>For</b>	<b>Against</b>	<b>Abstain</b>
James Caston	David Bradbury	
Matthew Hicks	Terence Carter	
Anders Linder	Teresa Davis	
Tim Weller	Rachel Eburne	
John Whitehead	Lucy Elkin	
	Nicholas Hardingham	
	Terry Lawrence	
	Colin Lay	
	Sarah Mansel	
	Adrienne Marriott	
	John Matthissen	
	Andrew Mellen	
	Gilly Morgan	
	Jen Overett	
	James Patchett	
	Janet Pearson	
	David Penny	
	Daniel Pratt	



	Miles Row	
	Keith Scarff	
	Andrew Stringer	
	Ollie Walters	
	Rowland Warboys	
	Nicky Willshere	
	Richard Winch	

By a vote of 5 votes for, 25 against and 0 abstentions.

**It was RESOLVED:-**

**1.1 That the amendment proposed by the Conservative Group was not accepted.**

- 104.19 Councillor Mellen thanked Councillor Eburne and the Finance team for their work preparing the budget. He outlined the uncertainties in future funding due to factors such as the upcoming general election, the upcoming review of local government funding, and the baseline reset of business rates. Other factors such as the war in Ukraine and the effect on the global economy, the status of Freeports, and the reduction in funding of Suffolk County Council services would put greater pressure on the Council and increase the demand on Council services.
- 104.20 Councillor Caston referred to page 77 of the report and questioned the increase in the Capital Programme budget for Disabled Facilities Grants. Councillor Eburne responded that some funds such as discretionary housing payments did run out previously. However, in relation to the Disabled Facilities Grants greater publicity to communities was being put in place and work to increase the amount residents could apply for was ongoing and would be communicated to Councillors and Parish Councils.
- 104.21 Councillor Matthissen outlined that cross party working was ongoing and in future the governance structure of the Council would be reviewed to consider the committee system which would be more collaborative.
- 104.22 Councillor Mansel highlighted that the Council needed to be responsible with public funds and provide high quality services and the increase in Council Tax would help deliver services and achieve the priorities in the Mid Suffolk Plan.
- 104.23 Councillor Scarff highlighted that residents had high expectations for the Council to deliver services. He hoped the use of collaborative working would continue as it was a constructive way of working and brought forward good ideas.
- 104.24 Councillor Patchett stated that he was pleased that the General Fund accounts were in a good position and that praised the funds that had been released for the SHELF project and investment in Gateway 14.

- 104.25 Councillor Lay supported the budget and praised that the approach was not reactive and addressed the needs of residents and would make changes in the community.
- 104.26 Councillor Willshere outlined that whilst it was a difficult decision to raise Council Tax there were schemes in place such as discretionary housing benefit to aid those on the lowest incomes. She added that investments should be made in Mid Suffolk, especially in the communities.
- 104.27 Councillor Carter outlined that whilst it was a difficult decision, the raise in Council Tax would maintain Council services for residents.
- 104.28 Councillor Walters supported the budget and stated that he wanted to see the economic, social and environmental benefits to residents as a result.
- 104.29 Councillor Eburne thanked Members for their contributions to the debate and outlined that now the Council wanted to look to the future and money needed to be put into working in the communities. She highlighted that there was an ongoing review on grants to maximise the funding received by communities, and support for the most vulnerable residents in the district was being carried out.

**In accordance with Council Procedure Rule 19.3, the vote was recorded as follows:**

<b>For</b>	<b>Against</b>	<b>Abstain</b>
David Bradbury	James Caston	
Terence Carter	Matthew Hicks	
Teresa Davis	Anders Linder	
Rachel Eburne	Gilly Morgan	
Lucy Elkin	John Whitehead	
Nicholas Hardingham		
Terry Lawrence		
Colin Lay		
Sarah Mansel		
Adrienne Marriott		
John Matthissen		
Andrew Mellen		
Jen Overett		
James Patchett		
Janet Pearson		
David Penny		
Daniel Pratt		
Miles Row		
Keith Scarff		
Andrew Stringer		
Ollie Walters		
Rowland Warboys		

Tim Weller		
Nicky Willshere		
Richard Winch		

By a vote of 25 votes for, 5 against and 0 abstentions.

**It was RESOLVED:-**

**1.1 The Council approves:**

**a) The General Fund Budget proposals comprising:**

- the 2024/25 revenue budget estimates as set out in Table 1.
- The 2024/25 to 2027/28 capital programme and it's funding as set out in Appendix A
- The movement in, and creation of, reserves as set out in Table 6.

**b) A 2% increase in the Band D Council Tax for 2024/25 from £171.59 to £175.03, an increase of £3.44 for a Band D property.**

**c) The new income bands and contribution rates for the 2024/25 100% Local Council Tax Reduction (Working Age) Scheme as set out in Table 5.**

**d) The 2024/25 Council Tax resolution set out in Appendix B. 3.2.**

**1.2 That Council notes:**

**e) The Medium-Term forecast set out in Table 9.**

**f) The section 25 report on the robustness of estimates and adequacy of reserves in Appendix C.**

104.30 A short break was taken between 7:00pm and 7:12pm.

**105 MC/23/41 HOUSING REVENUE ACCOUNT (HRA) 2024/25 BUDGET**

105.1 The Chair invited Councillor Eburne, Cabinet Member for Finance and Resources to introduce the report.

105.2 Councillor Eburne introduced the report and proposed the recommendations. Councillor Winch seconded this motion.

105.3 Councillor Matthissen asked for more detail on the issue of compliance. Councillor Winch responded that as gas and electricity checks were behind the Council self-referred to the regulator, and the Council had made progress on their notice.

Councillor Eburne added that following the referral fire safety issues were also discovered and it was requested that issues with damp and mould be addressed under the referral.

- 105.4 Councillor Hicks referred to recommendation E in the report and questioned whether the utility charge to tenants would be lowered if charges fell. Councillor Eburne responded that if costs did fall charges would be reduced. The Finance Business Partner – HRA added that the utility charge costs were backdated costs from the previous year.
- 105.5 Councillor Mansel questioned whether the increased charges in recommendations D and E in the report made the Council cost neutral. The Finance Business Partner – HRA responded that work was ongoing for cost neutrality, and low costs were taken so tenants were not overcharged.
- 105.6 Councillor Scarff questioned whether sheltered housing schemes would be made more energy efficient to reduce the increase in cost to tenants. Councillor Eburne responded that sheltered housing had been identified as an area that needed work and was currently being reviewed.
- 105.7 Councillor Caston queried the time period used to calculate the increased charge as it was when energy charges were above average. Councillor Eburne responded that under the rules in which the accounts work in the HRA this time period was used, however looking forward to these rules could be changed under the upcoming 30-year business plan.
- 105.8 During the debate, Councillor Patchett outlined that the funding model agreed by the Council in 2012 was a model that relied on interest only loans that needed to be refinanced, and a solution to this model was needed.
- 105.9 Councillor Mansel highlighted that the Council did not have any other option on the HRA and whilst this was not an easy decision for the Council to make groups needed to work together to find a solution going forward.
- 105.10 Councillor Scarff highlighted the period of 5 years with 1% rent reductions enforced by central Government and uncertainty due to Government restrictions on when rents could be raised or reduced, and that the Council would have been in a different position if restrictions were not enforced.
- 105.11 Councillor Carter outlined that essential services needed to be sustained and maintained and the backlog on maintenance and repairs which could not get worse as it would create further costs.
- 105.12 Councillor Stringer highlighted that the Council did not know when the HRA was originally agreed that rent reductions would be enforced by Central Government, and a better way to run this was needed.
- 105.13 Councillor Hicks stated that he did not support the report and increase in utility charges for tenants, and that splitting this charge over a period of two years would be a better approach.

- 105.14 Councillor Caston outlined that whilst he supported the increase in rents, he did not support the increase in utility charges and the period that heating costs were calculated over was not a reflection of current costs and he believed tenants were being overcharged.
- 105.15 Councillor Lawrence supported the report and outlined that if the utility charges were covered over the current year, then the tenants would see the benefit the following year. Additionally, for many of the tenants paying rent the costs would be covered by housing benefits and was not a true reflection of costs to residents.
- 105.16 Councillor Matthissen outlined that the HRA was a dysfunctional system and when the debt was taken on there was doubt as to how the housing stock had been paid for and how the Right to Buy scheme reduced the housing stock available, and the Council was left paying the mortgages on these houses due to the reduced cost to residents.
- 105.17 Councillor Davis outlined that whilst there was an increase in rents, in comparison to private rents the cost was lower and would help residents who could not afford private rents.
- 105.18 Councillor Lay highlighted the need for cross party working to find a solution to the HRA, and thanked Cabinet and officers for their work on the HRA.
- 105.19 Councillor Whitehead outlined that many issues such as a backlog on repairs from Covid, increased labour and material costs, and the long term borrowing system put in place by central Government to finance Council Housing contributed to the position the Council was in. However, he did not support the increase in rents and utility costs for tenants.
- 105.20 Councillor Walters commended the suggestions for cross party working to develop a better system, and he supported the recommendations in the report, as it was important for the Council to hold onto Council Houses and provide value for money as landlords.
- 105.21 Councillor Eburne thanked Members for their contributions to the debate and thanked officers for their work on the report. Whilst many tenants of Council Homes received housing benefit, the local housing allowance had increased and would make increases in charges less noticeable. Additionally, for residents most in need the Council was working with other organisations to provide support for tenants. The Council's duty was to the tenants, and it was necessary to ensure that funds were in place to maintain their homes. She encouraged Members to contribute to and engage with the upcoming 30 Year HRA Business Plan.

**In accordance with Council Procedure Rule 19.3, the vote was recorded as follows:**

<b>For</b>	<b>Against</b>	<b>Abstentions</b>
David Bradbury	James Caston	John Whitehead
Terence Carter	Matthew Hicks	
Teresa Davis	Anders Linder	
Rachel Eburne	Gilly Morgan	
Lucy Elkin		
Nicholas Hardingham		
Terry Lawrence		
Colin Lay		
Sarah Mansel		
Adrienne Marriott		
John Matthissen		
Andrew Mellen		
Jen Overett		
James Patchett		
Janet Pearson		
David Penny		
Daniel Pratt		
Miles Row		
Keith Scarff		
Andrew Stringer		
Ollie Walters		
Rowland Warboys		
Tim Weller		
Nicky Willshere		
Richard Winch		

By a vote of 25 votes for, 4 against and 1 abstention.

**It was RESOLVED: -**

**1.1 That the Council approves:**

- a) The HRA Budget proposals for 2024/25 set out in the report.**
- b) An increase of 7.7% for council house rents, equivalent to an average rent increase of £7.33 for social rent and a RPI + 0.5% (9.4%) increase for affordable rent of £10.65, a week be implemented.**
- c) That the RPI increase of 8.9% in garage rents, equivalent to an average rent increase of £3.84 a month, be implemented.**
- d) That an increase of 18% for sheltered housing service charges, equivalent to £27.19 a month, be implemented.**
- e) That an increase of 44% for sheltered housing utility charges, equivalent to £29.63 a month, be implemented.**

**106 MC/23/42 JOINT CAPITAL, INVESTMENT AND TREASURY MANAGEMENT STRATEGIES 2024-2025**

106.1 The Chair invited Councillor Matthissen, Joint Chair of the Joint Audit and Standards Committee to introduce the report.

106.2 Councillor Matthissen proposed the recommendations as set out in the report. Councillor Patchett seconded this motion.

106.3 Councillor Hicks queried whether the Council was still investing in the Schroder Income Maximiser L Income Fund. Councillor Matthissen responded that the Council was currently investing in the fund however investments would be reviewed. The Assistant Manager – Financial Accountant added that a series of workshops would be held with officers, Councillors, and financial advisors to balance the return of investments and keep in line with ESG (Environmental, Social and Governance) policy.

106.4 During the debate Members raised issues including the Council's investments in non ESG funds.

By 29 votes for and 1 against.

**It was RESOLVED: -**

**That the following be approved:**

- 1.1 The Joint Capital Strategy for the period 2023/24 to 2027/28, including the Prudential Indicators, as set out in Appendix A.**
- 1.2 The Joint Investment Strategy for service and commercial investments for the period 2023/24 to 2027/28, as set out in Appendix B.**
- 1.3 The Joint Treasury Management Strategy for the period 2023/24 to 2027/28, including the Joint Annual Investment Strategy as set out in Appendix C.**
- 1.4 The Joint Treasury Management Indicators as set out in Appendix D.**
- 1.5 The Joint Treasury Management Policy Statement as set out in Appendix G.**
- 1.6 The Joint Minimum Revenue Provision Policy Statement as set out in Appendix H**
- 1.7 The amendment to the 2023/24 Joint Minimum Revenue Provision Policy Statement, also set out in Appendix H**
- 1.8 That the key factors and information relating to and affecting treasury management activities set out in Appendices E, F, and I be noted.**

**1.9 That Workshops to inform and guide the evolution of the Councils investment portfolio be scheduled.**

**107 COUNCILLOR APPOINTMENTS**

107.1 Councillor Mellen proposed the appointments as set out in the agenda and tabled papers. Councillor Eburne seconded this motion.

By a unanimous vote.

**It was RESOLVED: -**

**That the Councillor appointments as set out in the agenda and tabled papers be approved.**

**108 MOTIONS ON NOTICE**

108.1 There were no motions on notice.

The business of the meeting was concluded at 8:07pm.

.....  
Chair



# Agenda Item 4

## MC/23/44

### MID SUFFOLK DISTRICT COUNCIL - 20 MARCH 2024

#### CHAIR'S ANNOUNCEMENTS

<b>EVENT</b>	<b>LOCATION</b>	<b>DATE</b>	<b>CHAIR</b>	<b>VICE CHAIR</b>
<b>FEBRUARY 2024</b>				
Empowering Community Energy	Portcullis House, Westminster	27-Feb	✓	
<b>MARCH 2024</b>				
Babergh Chair's Civic Service	Holy Trinity Church, Long Melford	03-Mar	✓	
The Suffolk Justice Service	St Edmundsbury Cathedral	17-Mar	✓	
Spring is Sung Charity Concert	The Apex, Bury St Edmunds	17-Mar	✓	

This page is intentionally left blank

# Agenda Item 10

## BABERGH DISTRICT COUNCIL and MID SUFFOLK DISTRICT COUNCIL

<b>TO:</b> BDC Council MSDC Council	<b>REPORT NUMBER:</b> <b>MC/23/45</b>
<b>FROM:</b> Cllr Sallie Davies, Cabinet Member for Planning Cllr Andrew Stringer, Cabinet Member for Heritage Planning and Infrastructure	<b>DATE OF MEETINGS:</b> 19 March 2024 (Babergh) 20 March 2024 (Mid Suffolk)
<b>OFFICER:</b> Tom Barker, Director Planning and Building Control. Interim Director Communities and Wellbeing	<b>KEY DECISION REF NO.</b> N/A

### COMMUNITY INFRASTRUCTURE LEVY (CIL) – CIL EXPENDITURE FRAMEWORK SIXTH REVIEW – MARCH 2024

#### 1. PURPOSE OF REPORT

- 1.1 The Community Infrastructure Levy (CIL) Expenditure Framework, the CIL Expenditure Framework Communications Strategy and the Timeline for Implementation and Review were all originally adopted by both Councils on the 24<sup>th</sup> April 2018 (Babergh) and 26<sup>th</sup> April 2018 (Mid Suffolk). A first review of these documents took place, and the changes were adopted at both Councils meetings on the 18<sup>th</sup> March 2019 (Mid Suffolk) and 19<sup>th</sup> March (Babergh). Second and third reviews took place in the winter 2019/20 and 2020/21 and a fourth review occurred in May 2022. Changes were agreed and adopted by both Councils in April 2020, March 2021 and July 2022 (Mid Suffolk) and October 2022 (Babergh). A fifth review occurred in January 2023 and was adopted by both Councils in March 2023. Both Councils agreed that they wished to keep the CIL Expenditure Framework under review and agreed the need for a sixth review which would take place during winter 2023/24 with any amendments being adopted and in place before Bid round 13 (May 2024). The sixth review was carried out in January 2024 and this report sets out the changes being proposed through this review (Background Documents refer)
- 1.2 It was also agreed that the Joint Member Panel who informed the content of the original CIL Expenditure Framework and successive reviews would remain to inform the sixth CIL Expenditure Framework review (accompanied by some new Members)
- 1.3 This sixth review process has now taken place as follows: -
- The involvement of the Joint Member Panel comprising the following Members: Leigh Jamieson, Mary McLaren, Lee Parker, Sarah Mansel, Keith Scarff, David Bradbury and James Caston.
  - Joint Member Panel meetings took place on the 3<sup>rd</sup> 4<sup>th</sup> 8<sup>th</sup> 10<sup>th</sup> 11<sup>th</sup> and 15<sup>th</sup> January 2024 to discuss the scope of the review and to agree outcomes.

- 1.4 This report together with the attached appendices A, (amended CIL Expenditure Framework) B, (CIL Expenditure Framework Communications Strategy) C, (Key CIL Dates Calendar for 2024/25) represent the conclusions and outcomes of the sixth CIL Expenditure Framework review process. These will be discussed in the report under Key information (see below) and constitute the foundation for the recommendations below.
- 1.5 Since the second review, a provision within the CIL Regulations of 2019 has taken effect and an annual Infrastructure Funding Statement (IFS - including an Infrastructure List) for each Council has been produced each year. These were agreed for both Councils in November 2020 to 2022 (inclusive) and December 2023. These documents have replaced the CIL Position Statements for each Council which were abolished (under this new legislation). The Councils published their Infrastructure Funding Statements (including the Infrastructure List) on the Councils website in December 2020, November 2021, November 2022 and December 2023. These documents (to be reviewed each year for each Council) are key documents that the CIL Expenditure Framework rest on. (The current IFS documents for both Councils can be accessed by the hyperlinks (Background Documents refer)
- 1.6 A further recommendation under cover of this report involves the need for a further (seventh) CIL Expenditure Framework review (to be informed by the Joint Member Panel) whilst Bid round 14 is taking place (October 2024) so that any amended scheme is in place before Bid round 15 opens (May 2024).

## **2. OPTIONS CONSIDERED**

- 2.1 There is a diverse spectrum of approaches to CIL expenditure across the country from Unitary Authorities who have absorbed CIL into their individual Capital Programmes to others who ringfence all funds to be spent locally. A range of different approaches was identified in Appendix A of the Framework for CIL Expenditure report provided to Cabinet's on the 5<sup>th</sup> and 8<sup>th</sup> of February 2018 and discussed in full during the workshops with the Joint Member advisory panel. Members adopted the documents set out in paragraph 1.1 above by Council decision in April 2018. Five reviews of the CIL Expenditure Framework and the CIL Expenditure Framework Communication Strategy have subsequently taken place with changes informed by the Joint Member Panel which were adopted by both Councils in March 2019, April 2020, March 2021 and July 2022 (Mid Suffolk) and October 2022 (Babergh) and March 2023.

## **3. RECOMMENDATIONS**

### **Babergh District Council only**

- 3.1 That Babergh District Council approve the amendments to the CIL Expenditure Framework – March 2024 (arising from the sixth review) - (Appendix A) and the CIL Expenditure Framework Communications Strategy – March 2024 (Appendix B).
- 3.2 That Babergh District Council agree that the CIL Expenditure Framework and the CIL Expenditure Framework Communications Strategy be reviewed again whilst Bid round 14 is being considered (October 2024) so that any amended scheme can be in place before Bid round 15 occurs (May 2025).
- 3.3 That Babergh District Council agree that the Joint Member Panel be retained to inform this (seventh) review.

### **Mid Suffolk District Council only**

- 3.4 That Mid Suffolk Council approve the amendments to the CIL Expenditure Framework – March 2024 (arising from the sixth review) - (Appendix A) and the CIL Expenditure Framework Communications Strategy – March 2024 (Appendix B).
- 3.5 That Mid Suffolk District Council agree that the CIL Expenditure Framework and the CIL Expenditure Framework Communications Strategy be reviewed again whilst Bid round 14 is being considered (October 2024) so that any amended scheme can be in place before Bid round 15 occurs (May 2025).
- 3.6 That Mid Suffolk Council agree that the Joint Member Panel be retained to inform this (seventh) review.

### **Both Babergh and Mid Suffolk District Councils**

*(Appendix C comprises the yearly Key CIL Dates Calendar which is produced under delegated powers (to the Director of Planning and Building Control/Interim Director Communities and Wellbeing in consultation with the Cabinet Members for Planning and Heritage Planning and Infrastructure and the Cabinet Members for People and Place ( West) and East) and Cabinet Member for Thriving Towns and Rural Communities each year (as part of the outcomes of the first review of the CIL Expenditure Framework) and is for reference purposes only.*

### **REASON FOR DECISION**

Community Infrastructure Levy (CIL) monies have been collected since the implementation of CIL in April 2016. There is no prescribed way for Councils to decide upon the spend of money collected through CIL, so Councils must agree their own approach and review processes.

## **4. KEY INFORMATION**

- 4.1 All the information captured in paragraph 4.5 has formed the substance of discussion by the Joint Member Panel at their meetings on the 3<sup>rd</sup> 4<sup>th</sup> 8<sup>th</sup> 10<sup>th</sup> 11<sup>th</sup> and 15<sup>th</sup> January 2024.
- 4.2 Since the first review of the CIL Expenditure Framework, the Infrastructure Delivery Plan (IDP) has been produced and updated in 2020 and is published as evidence for the Joint Local Plan. This document significantly changes the context for CIL expenditure as it identifies infrastructure priorities for both Districts to support growth. It classifies the infrastructure as critical, essential, or desirable and in doing so it signals that greater weight needs to be given to some infrastructure projects if compared with others as those listed as critical or essential are necessary where growth has taken place. This document is currently under review and work is taking place to update it.
- 4.3 In addition since the second review, the provisions of the CIL Regulations 2019 have taken place requiring all Councils to produce a yearly Infrastructure Funding Statement (IFS). This document captures monitoring information about the income and expenditure of CIL and s106 together with the allocation of Neighbourhood CIL and its expenditure by Parishes on a yearly basis. In addition, the legislation requires all Councils to produce an Infrastructure List within the IFS which is a list of all specific infrastructure projects that the Council expect to spend CIL and s106 on.

For Babergh and Mid Suffolk, this Infrastructure List (which is different for both Councils) is largely but not wholly comprised of infrastructure projects resulting from the Infrastructure Delivery Plan.

- 4.4 The current Infrastructure Funding Statements for both Councils were produced in November 2023 and the separate IFS documents for Babergh and Mid Suffolk were published on the Councils web site in December 2023. (These documents are capable of being read using the hyperlinks in Background Papers - see below).
- 4.5 For the sixth review, the Joint Member Panel discussed revisions and have made the following suggestions for changes to the CIL Expenditure Framework (Appendix A) and the CIL Expenditure Framework Communication Strategy (Appendix B) as follows:

### **CIL EXPENDITURE FRAMEWORK (Appendix A)**

#### **Key recommended changes: -**

- **Clarity around funding investment through District CIL for new pavilions and extensions to Sports clubs, Tennis and Cricket clubs who charge admittance fees for usage.** The Joint Member Panel agreed that the use of District CIL would be appropriate for Sports clubs, Tennis and Cricket Clubs subject to the prevailing community threshold limitations of £100,000 (maximum) and not more than 75% of total eligible project costs of the project. **The Joint Member Panel also requested that a Community User Agreement be signed by the Sports/Tennis/Cricket Club which should be secured before any CIL Bid is determined. This should be based on a statement in the CIL Bid application form on the community usage benefits that would accrue from any such CIL Bid. Joint Member Panel Members also agreed that it would not be appropriate to use District CIL for Golf facilities** as these are normally run as businesses for profit and it would be inappropriate for a private business to benefit from District CIL investment.
- **Clarity around use of District CIL for community led infrastructure projects involving community shops and cafes run by a properly constituted organisation for non for profit.** The Joint Member Panel agreed it would be appropriate for District CIL to be used for extension/alteration or improvement (for environmental purposes) of publicly owned buildings (Parish Council or Village Hall Management organisations) or such buildings which are the subject of a lease for no shorter period than 25 years subject to the following additional limitations/caveats :-
  - All the criteria and the prevailing community threshold limitations of £100,000 (maximum) and not more than 75% of total eligible project costs of the project
  - the submission of a business case (for the non for profit project) for a three year period (going forward) containing details of:
    - how the organisation proposing the CIL Bid is properly constituted for non for profit,

- how the non for profit community shop or café will operate including all expected expenditure for staff /management,
  - how much investment there will be on a yearly basis going forward for repairs and maintenance of the building (to be improved)
  - Where the non for profit asset elements of the community shop or café operation will be invested and what they will be used for such that the community receives maximum benefit from the operation
  - Submission of financial accounts for all the previous years if the use is already in existence.
- **In respect of such a non for profit community shop or café project, Joint Member Panel Members also considered the following caveats were appropriate given that it would be inappropriate for a private business to benefit from District CIL investment:-**
    - Any successful CIL Bid offer letter for such a CIL Bid will specify there would be no business (for profit) element within the floorspace affected by the CIL Bid.
    - There would also be no sublets for any other business purposes going forward.
- **Clarity around use of District CIL for community pubs – as community pubs are not classed as infrastructure and given the risks around these operations, the Joint Member Panel recommend that District CIL should not be used for such projects and that any such proposals would be termed to fall outside the terms of the CIL Expenditure Framework and not be considered eligible for funding.**
  - **With all car park proposals/projects, the Joint Member Panel recommend that the CIL bid forms be altered to allow for statements to be made (at the time of the CIL Bid) about the use of EV charging points and cycle provision (cycle parking/racks)**
  - **Review of continued District CIL funding for Churches where capital projects are proposed. The Joint Member Panel recommend that Churches can continue to apply for District CIL if there is strong evidence of community involvement through a statement of community involvement which would need to be submitted and assessed with the CIL Bid.** Such cases would be considered on a case-by-case basis and in accordance with all other provisions of the CIL Expenditure Framework (including being subject to community led infrastructure project financial thresholds - -£100K maximum and not more than 75% of the total eligible project costs). Repairs and maintenance would continue to be classed as not eligible for District CIL expenditure.
  - **Review of Approved and Implemented CIL Bid Projects – The Joint Member Panel recommend that Infrastructure Officers carry out a review of completed CIL Bid projects which would also ensure they are being satisfactorily used in accordance with any Community User Agreement which is in place.** The Joint Member Panel recommended trailing this review process for a one year period (to determine its effectiveness and to gain feedback for the next CIL Expenditure Framework) as follows;-

- Recommend review comprises a questionnaire and a follow up meeting with the CIL Bidder a year after the completion of the project.
  - Where any problems are identified (such as any projects community benefits having not yet been realised), the Joint Member Panel recommend Infrastructure Officers work with the CIL Bidder, the Ward Member, and the Town/Parish Council so that any problems can be resolved in a positive and constructive way (rather than in any financially punitive way).
- **Delivery of Library improvements/extensions – continuation of current District CIL funding position such that these can be supported through CIL Bids where there is proven evidenced need for improvement /expansion.** Such proposals for funding would be treated in the same way both Councils treat education proposals (wrapping up design costs in the final funding application). **Library projects must continue to be linked to business case based on housing growth and all CIL Bids and their funding strategies to be agreed prior to submission through the emerging CIL Bid process.** Design costs will not be claimed by SCC if there is ultimately no intention by SCC to deliver that library project. **However, in all cases projects for a new Library provision would need to be sought through s106 funding (rather than District CIL).**
- **CIL Bid Offers and Claims for payment (mainly Community Led development). Following some experiences of changes made to projects before financial claims are made, the Joint Member Panel recommend that:-**
    - Infrastructure Officers amend practices and procedures and strengthen communication with CIL Bidders.
    - Infrastructure Officers review the CIL Bid Offer letter (including list of eligible and non-eligible costs).
    - Infrastructure Officers Improve the formal briefings to Members and Parishes to highlight and address identified issues.
- **Clarity around use of District CIL for District Council infrastructure projects - The Joint Member Panel recommend the following:-**
    - **Continue with the current agreed position on District CIL usage for District Council infrastructure projects (i.e. that projects can be funded 100%).**
    - **Review the Councils Capital programme so that capital projects where District CIL could be used for infrastructure are identified such that District CIL becomes part of the funding strategy for those projects.**
- **Clarity around the use of District CIL for early years settings –** Given the likely impact of new reforms (the increase to 30 hours of free childcare for children aged 9 months to 4 years old, the Joint Member Panel recommend the following in respect of District CIL expenditure:-



- S106 contributions will need to be sought for new buildings.
  - District CIL can support extensions of existing schools where early years settings are part of the school.
  - District CIL cannot be used for business purposes so is not expected to be used to support privately run ventures.
  - In view of the three funding caveats above, this situation which is evolving should be kept under regular (yearly) review as there could be significant implications for the use of District CIL and the Infrastructure Delivery Plan (IDP).
- **Continuing review of the current £100,000 threshold (maximum) and not more than 75% of the total eligible costs of the project for Infrastructure Bids submitted by the Community** – agreed retention of current thresholds of maximum £100,000 and not more than 75% of total eligible project costs.
  - **Continued funding for Walking/Cycling and footpaths – projects in the LCWIP, ISPA, Infrastructure Delivery Plan (IDP) and Infrastructure Funding Statements (IFS) – Continuation of the pilot period/scheme with 100% District CIL funding for another one year period.** Continuation of the current proactive work for bringing LCWIP schemes forward. **Position on this pilot scheme /period to be reviewed again at next review (seventh) CIL Expenditure Framework.** This review would measure progress, methodology and outcomes for deliverability of schemes and consider options for District CIL funding going forward.
  - **CIL monies collected need to be spent. Encourage greater spending of CIL (including Neighbourhood CIL).** Continue with current proactive approaches towards expenditure and progression of CIL Bids as follows-, produce capital project workplans (for next 5 years) with other infrastructure providers (Health, SCC Waste etc). Continue with review alongside the IFS where Neighbourhood CIL spend is occurring and if necessary, carry out focused discussion with the Parish about capital CIL projects that are underway. Better targeted website advice with specific guidance note to aid project development as well as PIIPs (Parish Investment Infrastructure Plans) development. Look at the “chipping in” of Neighbourhood CIL – on a case-by-case basis and keep this matter under review for the next (seventh) review of CIL Expenditure Framework.
  - **Agreement to keep CIL Expenditure Framework under review.** Suggested that another CIL Expenditure Framework review (seventh) should occur whilst Bid round 14 is underway (October 2024) so that any revisions are adopted before Bid round 15 occurs in May 2025.
  - **Agreed the Joint Member Panel remain to inform the next seventh CIL Expenditure Framework and Communication Strategy review.**

## CIL EXPENDITURE FRAMEWORK COMMUNICATION STRATEGY (Appendix B)

### Key recommended changes: -

- **Continuation of three briefings each year to be given to Members and Parishes on CIL collection/processes of CIL expenditure/project development/use of Exacom** – to improve knowledge and facilitate expenditure of District and Neighbourhood CIL. This will allow Members to attend with their Parish/Town Council if desired. The Joint Member Panel suggested that any training of Exacom with Parishes be held on a “cluster of parishes” basis so that maximum reach to parishes can be enabled as effectively as possible.
- **The Joint Member Panel recommend that one Member training session be held in the forthcoming year as a joint briefing session with officers of SCC and Infrastructure Officers so that the roles and responsibilities for SCC for pupil placement and the role of Academies together with the changes coming forward to Early Years settings can be more fully understood by Members.** (SCC Officers have agreed to this suggestion.)
- **Inclusion of Parish Investment Infrastructure Plans – (PIIPs) and People and Place Plans (PPPs) into the subject matter for Member and Parish briefings each year**

### KEY OUTCOMES FROM THE CHANGES SUGGESTED BY THE JOINT MEMBER PANEL

#### 4.6 The key outcomes would be as follows: -

- Clarity around use of District CIL so as to allow sports clubs, tennis and cricket clubs to apply for District CIL thereby affording another opportunity for community infrastructure to take place. However, golf facilities (normally run as a private business) are specifically excluded as it would be inappropriate for a private business to benefit from District CIL investment.
- Clarity around use of District CIL so as to allow non for profit community shops and cafes to apply for District CIL thereby allowing another opportunity for community infrastructure to take place (whilst specifically excluding any business use of District CIL)
- District CIL is specifically excluded for community public house projects as any such proposals would not be regarded as infrastructure and fall outside the terms of the CIL Expenditure Framework (and not be considered eligible for funding).
- For all CIL Bid car parking projects consideration will need to be given to EV charging points and also the provision of cycle parking.
- Greater use of Community User Agreements and Statements of Community involvement for some community development proposals to ensure that maximum community benefit is derived from these CIL Bids.

- A suggested review of completed CIL Bid projects after a year (on a trial basis) so that all stated community benefits are fully realised and if any problems are identified it is suggested that these can be constructively resolved locally.
- Clarity around new library provision being funded through s106 rather than District CIL (with the latter being used for library expansion /improvement and alteration) where there is a proven business case linked to housing growth.
- Continuation of use of District CIL for District Council infrastructure projects alongside a review of the Councils Capital programme so that proposed capital projects (where District CIL could be used for infrastructure) are identified such that District CIL becomes part of the funding strategy to aid delivery of those projects.
- Regular (yearly) review of Early years setting provision (given the government reforms) as this could have a significant impact on District CIL expenditure.
- Continuation of the current pilot period/scheme for CIL funding for Walking and cycling schemes (from the LCWIP for each District) to be operated for a one year period with 100% District CIL funding. The success of the pilot scheme/period to be evaluated at the next (seventh) CIL Expenditure Framework review.
- Continue with current proactive approaches towards expenditure and progression of CIL Bids and in addition, produce capital project workplans (for next 5 years) with other infrastructure providers (Health, SCC Waste etc). This will ensure that a programme of infrastructure to be delivered by the Infrastructure providers can be developed. This will provide for a planned investment programme of infrastructure which will allow for budgeting and forecasting of CIL funds (subject to fluctuating levels of housing growth). Proactive measures for expenditure of CIL and Neighbourhood CIL suggested to assist with expenditure and delivery of infrastructure.
- Continue to improve communication around CIL particularly for Members and Parishes by continuation of three briefing sessions each year (to improve knowledge and facilitate expenditure of both District and Neighbourhood CIL). A further training session to be undertaken jointly with SCC in 2024 so that Members understand more about the roles of SCC as education pupil place provider and Academies and the impact of new reforms around Early years settings.
- Continue to keep the CIL Expenditure Framework and the CIL Expenditure Framework Communication Strategy under regular yearly review. Continue the work of the Joint Member Panel to inform changes through the yearly reviews.

4.7 It is recommended that both Councils agree these changes under the specific recommendations in Section 3 above.

## **5. LINKS TO OUR PLAN FOR BABERGH AND TO THE MID SUFFOLK PLAN**

- 5.1 The effective spending of CIL monies will contribute to four of the five priority areas in the Our Plan for Babergh and the Mid Suffolk Plan which both set out a vision approach and strategic priorities for each Council for the period 2023-2031( Climate Change, Lack of Infrastructure, Transport and Communities and Well Being).

## **6. FINANCIAL IMPLICATIONS**

- 6.1 The adopted CIL Expenditure Framework is critical to the funding of infrastructure to support growth and sustainable development.
- 6.2 The CIL Regulations stipulate that CIL monies which are collected must be spent on Infrastructure. Before 1<sup>st</sup> September 2019, each Council was required to publish a list of infrastructure that they will put the CIL monies towards. These lists were known as the "Regulation 123 Lists". However, on the 1<sup>st</sup> of September 2019, new CIL Regulations were enacted, with the CIL 123 Lists being abolished, and in order to provide clarity given this changing situation, each Council adopted a CIL Position Statement containing a list of infrastructure that it would spend its CIL monies on. The authority for this was provided by a Council decision in March 2019 when the first review of the CIL Expenditure Framework was undertaken, and a revised scheme was agreed (by both Councils). The CIL Position Statements were identical for both Councils. Under the 2019 CIL Regulations each Council has to produce a yearly Infrastructure Funding Statement (IFS); the first one was agreed by both Councils Cabinets, and they were published on the Councils web site in December 2020. The subsequent yearly Infrastructure Funding Statements contain an Infrastructure List which is founded not wholly but partly on the Infrastructure Delivery Plan. Upon the publication of each Councils IFS under the 2019 CIL Regulations, each Council's CIL Position Statements were abolished.
- 6.3 CIL is collected and allocated in accordance with the CIL Regulations 2019. Each Council retains up to 5% of the total CIL income for administration of CIL. From the remainder, 15% (capped at £100 per Council Tax dwelling indexed linked) is allocated to Parish or Town Councils, but where there is a made Neighbourhood Plan in place this figure rises to 25% (with no cap). For those Parishes where there is no Parish or Town Council in place the Council retains the monies and spends the Neighbourhood CIL funds through consultation with the Parish concerned.
- 6.4 At the time that the Parish pay-outs are made (by 28<sup>th</sup> April and 28<sup>th</sup> October each year), the 20% save for the Strategic Infrastructure fund is also undertaken as required by the CIL Expenditure Framework. The Strategic Infrastructure Fund money is stored separately to the Local Infrastructure Fund at this point. At the same time, the ringfencing of CIL monies (for developments of ten houses or more) occurs; these are known as Ringfenced Infrastructure Funds. This ringfencing of funds occurs in order to ensure that infrastructure provision for major housing developments is prioritised and ringfenced for spend. As this accounting requires Finance to verify the figures, daily accounting in this way would be too cumbersome and resource hungry to carry out. There is no adverse impact on the Bid Round process or cycle to this method of accounting. Indeed, these dates work well with the Bid round process.
- 6.5 The remaining 80% of the CIL monies comprises the Local Infrastructure Fund. Each Bid round, the available funds for expenditure from the Strategic Infrastructure Fund, the Ringfenced Infrastructure Funds and the Local Infrastructure Fund are calculated. The CIL Bids are then paid for from these different funds of money.

6.6 Infrastructure delivery in CIL expenditure terms is as follows: - .

**Total of allocated/expenditure of CIL funding for Babergh District Council**

BDC Year	Total of CIL allocated to projects	Total of CIL Expenditure for projects	Total of CIL allocated not spent returned to the District Reserve
2018/19	£417,104.54	£12,575.85	£0.00
2019/20	£526,496.48	£296,675.19	£11,110.25
2020/21	£782,064.09	£249,247.96	£138,662.01
2021/22	£702,109.99	£960,894.28	£52,975.14
2022/23	£839,945.93	£402,726.12	£111.63
2023/24 to end of quarter 3	£209,647.15	£984,108.31	£54,372.86
<b>TOTAL</b>	<b>£3,477,368.18</b>	<b>£2,906,227.71</b>	<b>£257,231.89</b>

**Total Expenditure as at the 31<sup>st</sup> December 2023 for Babergh District Council**

Infrastructure Type	No of CIL Bids	Amount Allocated	Amount Spent to the 31 <sup>st</sup> December 2023
COMMUNITY BIDS	55	£2,836,142.18	£2,286,829.21
EDUCATION BIDS	2	£583,110.00	£583,110.00
HEALTH BIDS	1	£3,526.00	£3,526.00
WASTE BIDS	1	£50,000.00	£32,762.50
WALKING AND CYCLING BIDS	1	£4,590.00	£0.00
<b>TOTAL</b>	<b>60</b>	<b>£3,477,368.18</b>	<b>£2,906,227.71</b>

**Number of completed projects and ongoing projects funded by CIL for Babergh District Council**

DISTRICT CIL FUNDED PROJECTS	NUMBER OF COMPLETED PROJECTS	NUMBER OF ONGOING PROJECTS
COMMUNITY INFRASTRUCTURE	43	12
EDUCATION INFRASTRUCTURE	2	0
HEALTH INFRASTRUCTURE	1	0
WASTE INFRASTRUCTURE	1	0

DISTRICT CIL FUNDED PROJECTS	NUMBER OF COMPLETED PROJECTS	NUMBER OF ONGOING PROJECTS
WALKING AND CYCLING INFRASTRUCTURE	1	0
<b>TOTAL</b>	<b>48</b>	<b>12</b>

**Total of allocated/expenditure of CIL funding for Mid Suffolk District Council**

MSDC Year	Total of CIL allocated to projects	Total of CIL Expenditure for projects	Total of CIL allocated not spent returned to the District Reserve
2018/19	£235,276.99	£13,240.10	£0.00
2019/20	£3,647,775.26	£314,297.46	£1,372.37
2020/21	£1,049,474.70	£2,025,900.00	£51,819.10
2021/22	£3,849,927.97	£2,443,749.02	£67,806.25
2022/23	£2,267,990.89	£796,045.96	£115,476.62
2023/24 to end of quarter 3	£510,163.22	£4,199,614.56	£1,020,597.12
<b>TOTAL</b>	<b>£11,560,609.03</b>	<b>£9,792,847.10</b>	<b>£1,257,071.46</b>

**Total Expenditure as at the 31<sup>st</sup> December 2023 for Mid Suffolk District Council**

Infrastructure Type	No of CIL Bids	Amount Allocated	Amount Spent to the 31 <sup>st</sup> December 2023
COMMUNITY INFRASTRUCTURE	42	£1,867,867.46	£1,518,836.06
EDUCATION INFRASTRUCTURE	6	£7,354,355.21	£7,354,355.21
HEALTH INFRASTRUCTURE	3	£367,170.34	£353,058.34
WASTE INFRASTRUCTURE	1	£26,762.50	£26,762.50
RAIL INFRASTRUCTURE	1	£100,000.00	£72,961.93
WALKING AND CYCLING INFRASTRUCTURE	5	£120,509.00	£0.00
GREEN INFRASTRUCTURE	1	£10,263.00	£10,263.00
BUS PASSENGER TRANSPORT INFRASTRUCTURE	4	£24,870.06	£24,870.06
EMERGENCY SERVICES INFRASTRUCTURE	1	£431,740.00	£431,740.00
<b>TOTAL</b>	<b>64</b>	<b>£10,303,537.57</b>	<b>£9,792,847.10</b>

**Number of completed projects and ongoing projects funded by CIL for**

## Mid Suffolk District Council

DISTRICT CIL FUNDED PROJECTS	NUMBER OF COMPLETED PROJECTS	NUMBER OF ONGOING PROJECTS
COMMUNITY INFRASTRUCTURE	30	12
EDUCATION INFRASTRUCTURE	6	0
HEALTH INFRASTRUCTURE	2	1
WASTE INFRASTRUCTURE	1	0
RAIL INFRASTRUCTURE	0	1
WALKING AND CYCLING INFRASTRUCTURE	0	5
BUS PASSENGER TRANSPORT INFRASTRUCTURE	4	0
GREEN INFRASTRUCTURE	1	0
EMERGENCY SERVICES INFRASTRUCTURE	1	0
<b>TOTAL</b>	<b>45</b>	<b>19</b>

## 7. LEGAL IMPLICATIONS

7.1 Both the original and amended CIL Expenditure Frameworks are legally sound and robust. A legal representative from the Councils Shared Legal Service has been directly involved in the majority of the reviews and has reviewed the documentation and changes in this review and is satisfied that the proposed amendments are legally sound and robust.

7.2 Regular monitoring reports required by the CIL Regulations have been produced for each year for both Councils on CIL expenditure between the years 2016-2019 inclusive. The reports for both Councils are different and are published on the Councils website which can be accessed using the following hyperlink as follows: -

[CIL Collection & Spending - Mid Suffolk District Council - Babergh & Mid Suffolk District Councils - Working Together](#)

7.3 Under the CIL Regulations of 2019 it is necessary for each Council to produce an Infrastructure Funding Statement (IFS) containing monitoring information in relation to income and expenditure of CIL and s106 and allocation and expenditure of Neighbourhood CIL by Parishes on a yearly basis. In addition, the IFS for each Council contains an Infrastructure List. All this information is different for both Councils and for the years 2019/20 2020/21, and 2021/22 the information can be accessed using the following hyperlinks:-

[CIL Collection & Spending - Mid Suffolk District Council - Babergh & Mid Suffolk District Councils - Working Together](#)

7.4 The current Infrastructure Funding Statement (including the Infrastructure List) for both Councils for the year 2022/23 are different for both Councils and can be accessed using the hyperlink:-

**Year 2022/23 – Babergh**

<https://www.midsuffolk.gov.uk/documents/d/asset-library-54706/bdc-infrastructure-funding-statement-22-23>

<https://www.babergh.gov.uk/documents/d/asset-library-54706/appendix-b-bdc-ifs-22-23-infrastructure-list>

**Year 2022/23 - Mid Suffolk**

<https://www.midsuffolk.gov.uk/documents/d/asset-library-54706/msdc-infrastructure-funding-statement-22-23>

<https://www.babergh.gov.uk/documents/d/asset-library-54706/appendix-b-msdc-ifs-22-23-infrastructure-list>

**8. RISK MANAGEMENT**

8.1 Key risks are set out below (taken from the Strategic Planning Operational Risk Register) as follows:-

Key Risk Description	Likelihood 1-4	Impact 1-4	Key Mitigation Measures	Risk Register and Reference*
Development may be unsustainable if we do not secure investment in infrastructure. Here is a risk that Infrastructure is not delivered where it is needed.	3	2	Infrastructure needs are detailed through a published Infrastructure Delivery Plan (IDP), which is updated periodically.	Strategic Planning Operational Risk register 18
Level of Community Infrastructure Levy (CIL) being charged is low. There is a risk that insufficient funds would be available for critical and essential infrastructure.	3	3	Publish revised CIL Charging Schedules for consultation.	Strategic Planning Operational Risk register 19
Unable to progress CIL Charging Schedules to Examination and Adoption. There is a risk that insufficient funds would be available for critical and essential infrastructure.	2	3	Be clear on the purpose and content of the CIL Charging Schedules prior to consultation.	Strategic Planning Operational Risk register 20



Non-payment of CIL or non-collection of s106 payments. There is a risk that Insufficient funds would be available for infrastructure.	3	3	Appointment of a Debt recovery officer in 2021 to ensure improved recovery of CIL and s106 debt.	Strategic Planning Operational Risk register 21
Planning reforms meaning changes to the development plan system and infrastructure delivery resulting in different approaches needing to be followed. There are risks that Changes to the plan-making process and the replacement of CIL with an Infrastructure Levy.	3	3	Ensure prepared for any forthcoming changes.	Strategic Planning Operational Risk register 22
Absence of clarity on where expenditure is to be made as a result of plans and strategies being incomplete or out-of-date. There is a risk that Failure to allocate expenditure such that if we do not secure investment in infrastructure (schools, health, public transport improvements etc.), then development is stifled and/or unsustainable.	2	3	Adopted Community Infrastructure Levy (CIL), secures investment on infrastructure via the planning process (which includes S106). Creating the Joint Corporate Plan, the emerging Joint Local Plan with associated Infrastructure strategy and Infrastructure Delivery Plan and Infrastructure Funding Statement will ensure that infrastructure across both Councils is addressed.	Strategic Planning Operational Risk register 33
Failure to produce a yearly Regulation 62 report would result in non-compliance with the CIL Regulations 2010 (as amended) and may mean that Members and the public are not aware of CIL income and expenditure activities. Under the CIL Regulations 2019 an annual Funding Statement is required to address CIL and s106 developer contributions and a list of infrastructure projects ("Infrastructure List"). Failure to so will also result in non-compliance with the CIL Regulations (as amended).	1	2	The Infrastructure Team produces the required report which is checked and verified by Financial services/open to review by External Audit. Reminders are set to ensure the report is published by the statutory date. The format of the Monitoring report which in future will be known as the annual Infrastructure Funding Statement (IFS) is laid out in the CIL Regulations, so there is no risk in relation to the way the information is presented	Strategic Planning Operational Risk register 34

<p>Failure to monitor due to an absence of staff undertaking this task. There is a risk that failure to monitor expenditure may result in CIL expenditure not being effective.</p>	<p>2</p>	<p>3</p>	<p>The software which supports CIL collection will be used to support CIL expenditure. In addition, it is envisaged that a twice yearly (at least) CIL Expenditure Programme will be produced which will include details of all allocated and proposed CIL expenditure and this together with the software will be used for effective monitoring.</p>	<p>Strategic Planning Operational Risk register 35</p>
<p>If too high a value is allocated into the Strategic Infrastructure Fund, there is a risk that there would be insufficient Local Infrastructure Funding available to deliver the infrastructure required to mitigate the harm, thereby ensuring sustainable development.</p>	<p>2</p>	<p>3</p>	<p>The Infrastructure Team will continue to monitor all allocations of CIL Funds and the CIL Expenditure Framework review will include this risk as a key element of the review to ensure the level set remains appropriate.</p>	<p>Strategic Planning Operational Risk register 36</p>
<p>If 25% Neighbourhood CIL is automatically allocated to any Parish/Town Councils where there is no Neighbourhood Plan in place, there is a risk that there would be insufficient CIL Funding to allocate to the Strategic Infrastructure Fund and also the risk that there would be insufficient Local Infrastructure Funding available to deliver the infrastructure required to mitigate the harm, thereby ensuring sustainable development.</p>	<p>2</p>	<p>3</p>	<p>The Infrastructure Team will continue to monitor all allocations of Neighbourhood CIL and other CIL Funds and the CIL Expenditure Framework review will include this risk as a key element of the review to ensure allocations of CIL remain appropriate and projects to make development sustainable are able to be delivered.</p>	<p>Strategic Planning Operational Risk register 37</p>

If commencements of major housing developments were not correctly monitored or the incorrect apportionment of CIL monies were to occur such that monies could not be allocated towards major housing developments, inadequate infrastructure provision would result.	2	4	The Infrastructure Team will continue to monitor all commencements of development through the service of the required Commencement Notice by developers such that correct apportionment of CIL Funds can be undertaken. The CIL Expenditure Framework review will include this risk as a key element of the review to ensure allocations of CIL remain appropriate and projects to make development sustainable are able to be delivered.	Strategic Planning Operational Risk register 38
--	---	---	---	---

### Assurances (for collection of CIL monies)

8.2 In September 2016 Internal Audit issued a report in relation to CIL governance processes. The Audit Opinion was High Standard and no recommendations for improvement to systems and processes were made. Table 5 provides a definition of this opinion:

**Table 5**

	Operation of controls	Recommended action
High standard	Systems described offer all necessary controls. Audit tests showed controls examined operating very effectively and where appropriate, in line with best practice.	Further improvement may not be cost effective.
Effective	Systems described offer most necessary controls. Audit tests showed controls examined operating effectively, with some improvements required.	Implementation of recommendations will further improve systems in line with best practice.
Ineffective	Systems described do not offer necessary controls. Audit tests showed key controls examined were operating ineffectively, with a number of improvements required.	Remedial action is required immediately to implement the recommendations made.
Poor	Systems described are largely uncontrolled, with complete absence of important controls. Most controls examined operate ineffectively with a large number of non-compliances and key improvements required.	A total review is urgently required.

8.3 On the 18<sup>th</sup> December 2017 Joint Overview and Scrutiny received a fact sheet on collection and current thinking on CIL expenditure and questions were answered in relation to it. Members of that Committee were advised of the route map towards getting a framework for CIL expenditure formally considered. The resulting joint CIL Expenditure Framework, the CIL Expenditure Communications Strategy and the Timeline for the Expenditure of CIL and its Review were adopted by both Councils on the 24<sup>th</sup> April 2018 (Babergh) and 26<sup>th</sup> April 2018 (Mid Suffolk).

8.4 In May 2018 the results of an investigation by Internal Audit on behalf of the Director Planning and Building Control were produced following complaints regarding the CIL process in place for Babergh and Mid Suffolk. The investigation concluded: -

“The information provided to the public in relation to the CIL process is superior to that found for some other Councils and the team go over and above the requirements when supporting applicants where resources allow them to do so. It is Internal Audit’s opinion that the Infrastructure team, even though working under challenging conditions with increasing numbers of applications, are providing a good service to customers and pro-actively looking for ways to improve where possible.”

“The audit opinion is therefore high standard” – (paragraph 8.3 Table 5 defines)

8.5 In September 2018 Internal Audit conducted a review of CIL processes and released a written report. It contains a Substantial Assurance audit opinion (with two good practice points needing to be addressed relating to further clarification of “best value” (one of the criteria for assessing CIL Bids) and storage of all electronic communication. Both these matters have been addressed. The first point by including further explanation about Best Value in Appendix A; the second point through resource adjustments.

8.6 Within the first review process, information was captured from a wide array of sources and all feedback was shared with the Joint Member Panel including the recommendations of Overview and Scrutiny who met to discuss and review the operation of the CIL Expenditure Framework on the 19<sup>th</sup> November 2018. Their recommendations were considered as part of the first review of the CIL Expenditure Framework process by the Joint Member Panel.

8.7 On the 19<sup>th</sup> September 2019, a report was prepared for consideration by Joint Overview and Scrutiny on CIL expenditure with five witnesses including Infrastructure Providers, Cockfield Parish Council and a member of the Joint Member Panel; the latter of which worked to inform the second review of the CIL Expenditure Framework. Joint Overview asked questions of the witnesses and concluded the following: -

- Joint Overview and Scrutiny Committee endorses the work of the CIL team (and the CIL Member Working Group) and notes that a fit and proper process is in place in respect of the bidding and allocation of CIL funds

8.8 In line with the fifth review, both Councils agreed for the Joint Member Panel to inform a sixth review during Bid round 12 (in October 2023) so that any changes could be in place before Bid round 13 commences in May 2024. This report captures the work of the Joint Member Panel on the sixth review.

## 9. CONSULTATIONS

9.1 The amended CIL Expenditure Communications Strategy continues the requirement for both Councils to consult the following bodies or organisations (14 days) where Bids for their Wards or Parish have been submitted: -

- Division County Councillor
- District Member(s)
- Parish Council

9.2 Where appropriate as part of the CIL process and assessment of the Bids, Officers have also taken advice from other Officers within the Council; including the Communities team, Public Realm, Development Management and Environmental Protection.

9.3 Regular Parish events and Member briefings will continue to be held to familiarise all with the CIL Expenditure Framework (including amendments) and how we can continue to work together to provide infrastructure for the benefit of both Districts communities.

## 10. EQUALITY ANALYSIS

10.1. Please see attached screening report.

## 11. ENVIRONMENTAL IMPLICATIONS

11.1 It is important that appropriate infrastructure mitigates harm which could be caused by new development without its provision. CIL is one way in which infrastructure is provided. The CIL Expenditure Framework requires two Bid rounds per year supported by the provision of a CIL Expenditure Programme for each Bid round and Council report. The twice-yearly CIL Expenditure Programme for Babergh and Mid Suffolk contains the CIL Bid decisions for each Bid round together with updates on progress of delivery on CIL Bids and details of emerging infrastructure projects. There is no EIA Assessment required.

## 12. APPENDICES

Title	Location
(a) Amended CIL Expenditure Framework – March 2024	Attached
(b) Amended CIL Expenditure Framework Communications Strategy – March 2024	Attached
(c) Key Dates for CIL Calendar 2024/2025	Attached
(d) EQIA Screening report for Equality Analysis	Attached

## 13. BACKGROUND DOCUMENTS

13.1 The CIL Expenditure Framework (March 2023) the CIL Expenditure Framework Communications Strategy (March 2023), Key dates for the CIL Calendar 2023/24 all constitute background papers for this report. These are as follows: -

- **The CIL Expenditure Framework (adopted March 2023 (by bpth Councils))**

[https://www.midsuffolk.gov.uk/documents/54707/115216/Appendix+A+The+CIL+Expenditure+Framework+Babergh+and+Mid+Suffolk+Final+amended+March+2023\\_.pdf/66c1b676-37fe-2acf-516f-61db9b627937?t=1684840147720](https://www.midsuffolk.gov.uk/documents/54707/115216/Appendix+A+The+CIL+Expenditure+Framework+Babergh+and+Mid+Suffolk+Final+amended+March+2023_.pdf/66c1b676-37fe-2acf-516f-61db9b627937?t=1684840147720)

- **The CIL Expenditure Framework Communications Strategy (adopted by both Councils in March 2023)**

<https://www.midsuffolk.gov.uk/documents/54707/115216/Appendix+B+CIL+Expenditure+Framework+Communication+Strategy+Final+March+2023.pdf/8e6cf5c7-7388-6aa9-8c0f-c575e097a5ef?t=1684840148421>

- **Key Dates in CIL Calendar 2023/24**

<https://www.midsuffolk.gov.uk/documents/54707/115216/Appendix+C+CIL+Expenditure+Calender+Key+dates+2023-24.pdf/6940d595-3511-6b24-4147-59f376f1c94c?t=1684840148988>

#### **14. REPORT AUTHOR**

Authorship: Christine Thurlow.

Tel No. 01449 724525

Professional Lead - Key Sites and Infrastructure.

Email [christine.thurlow@babberghmidsuffolk.gov.uk](mailto:christine.thurlow@babberghmidsuffolk.gov.uk)

# **The Community Infrastructure Levy Expenditure Framework**

**Babergh and Mid Suffolk  
District Councils**

Appendix A – Amended March 2024

## **The Community Infrastructure Levy Expenditure Framework.**

### **1. BACKGROUND**

- 1.1 The development of a detailed framework for Community Infrastructure Levy (CIL) expenditure for consideration and adoption by both Councils is required as there is no set approach for CIL expenditure prescribed either by Central Government or through the CIL Regulations 2010 (as amended).
- 1.2 As such all Councils across the country where a CIL charging regime has been adopted and is being implemented have brought in their own schemes for how CIL monies are spent.

### **CIL Expenditure – Key Documents**

- 1.3 The CIL Regulations stipulate that CIL monies which are collected must be spent on infrastructure. On the 1<sup>st</sup> September 2019 new CIL Regulations were introduced. Prior to this each Council was required to publish a list of infrastructure types that would be funded wholly or partially through CIL. These lists, known as the “Regulation 123 Lists”, were adopted by Babergh and Mid Suffolk and published in January 2016. However, the new CIL Regulations abolished Regulation 123 and in order that both Councils had clarity over the infrastructure that it would provide through CIL funding, both Councils adopted a CIL Position Statement (identical in content) regarding CIL expenditure.
- 1.4 Under the CIL Regulations of 2019 there was a further new requirement for each Council to produce an Infrastructure Funding Statement (IFS) each year with a deadline for the production (and publication on the web site) of the first IFS (for each Council) by the 31<sup>st</sup> December 2020. The IFS comprise a yearly document containing data on the collection and expenditure of CIL and s106 together with details relating to the allocation of Neighbourhood CIL to Parishes and its expenditure by Parishes. In addition, the IFS for each Council has to include an Infrastructure List of specific projects that District CIL (and s106) would be spent on.
- 1.5 Under the 2019 CIL Regulations there was also a requirement placed on all Councils to abolish any existing general type of infrastructure lists once any IFS had been produced and published. Both Councils produced an Infrastructure Funding Statement in November 2020 and published them in December 2020 (on the Councils web site). In addition, both Councils abolished their CIL Position Statement and will be regularly reviewing and producing/publishing a new IFS each year. Consequently, the yearly Infrastructure Funding Statements for each Council represent key documents in relation to the CIL Expenditure and should be read in conjunction with this Framework.

### **Reviews of the CIL Expenditure Framework and Adoption of CIL Expenditure Arrangements**

- 1.6 The CIL Expenditure Framework and the CIL Expenditure Framework Communication Strategy were originally agreed and adopted by both Councils



(in April 2018). Since then, the key documents have been reviewed on six separate occasions as follows: -

- A first review was undertaken through consideration of the scheme by Babergh and Mid Suffolk's Joint Overview and Scrutiny (in November 2018) and then informed by a Joint Member Panel when changes were agreed by both Councils. These revisions (identified at the back of this document under first review) were adopted by both Councils in March 2019.
- A second review was also undertaken by consideration of the scheme by Babergh and Mid Suffolk's Joint Overview and Scrutiny (in September 2019) and then informed by a Joint Member Panel when changes were proposed and ultimately agreed by both Councils. These second review revisions (identified at the back of this document) were adopted by both Councils in April 2020.
- A third review of the CIL Expenditure Framework was undertaken by the Joint Member Panel from October 2020 through to February 2021. These third review revisions (identified at the back of this document) were adopted by both Councils in March 2021
- A fourth review of the CIL Expenditure Framework was undertaken by the Joint Member Panel in May 2022. These fourth review revisions (identified at the back of this document) were adopted by Mid Suffolk in July 2022 and by Babergh in October 2022.
- A fifth review of the CIL Expenditure Framework was undertaken by the Joint Member Panel in December 2022 and January 2023. These fifth review revisions (identified at the back of this document) were adopted by both Councils in March 2023)
- A sixth review of the CIL Expenditure Framework was undertaken by the Joint Member Panel in January 2024. These sixth review revisions (identified at the back of this document) were adopted by both Councils in March 2024)

- 1.7 This CIL Expenditure Framework key document will be kept under periodic (likely yearly) review with details of any forthcoming review to be set out in the yearly CIL Key dates calendar published on the Councils' websites.

### **The Key CIL Expenditure Framework Documents for CIL Expenditure**

- 1.8 The following documents comprise the key components of the CIL Expenditure Framework: -
- **CIL Expenditure Framework** - this document is the key document that sets out the parameters, processes and governance arrangements for spending CIL monies. It is available on the Councils' websites.
  - **CIL Expenditure Framework Communication Strategy** - this separate document is the key document that sets out the parameters and

arrangements for communication around spending CIL monies. It is available on the Councils' websites.

- **Key CIL dates calendar** - produced each year to allow all to understand important dates around CIL.
- **Infrastructure Funding Statement (IFS) for Babergh** - produced each year and contains monitoring information for income and collection of CIL, s106 and the allocation and expenditure of Neighbourhood CIL. In addition, it contains an Infrastructure List which is a list of specific infrastructure projects for Babergh that CIL can be spent on (which are largely but not wholly made up of infrastructure projects contained in the Infrastructure Delivery Plan. It is produced annually, and the current version represents the key document for allowing CIL expenditure.
- **Infrastructure Funding Statement (IFS) for Mid Suffolk** - produced each year and contains monitoring information for income and collection of CIL, s106 and the allocation and expenditure of Neighbourhood CIL. In addition, it contains an Infrastructure List which is a list of specific infrastructure projects for Mid Suffolk that CIL can be spent on (which are largely but not wholly made up of infrastructure projects contained in the Infrastructure Delivery Plan. It is produced annually, and the current version represents the key document for allowing CIL expenditure.

## **2. THE CIL EXPENDITURE FRAMEWORK**

2.1 This document sets out the key elements, parameters and information relating to the CIL Expenditure Framework in a clear and concise format under the following headings: -

- **Key Principles of The CIL Expenditure Framework**
- **Processes of The CIL Expenditure Framework**
- **Validation and Screening of bids and Prioritisation Criteria of Bids Under the CIL Expenditure Framework (to Allow Bids to be Considered and Determined)**
- **Governance of The CIL Expenditure Framework**

2.2 Each of these sections are set out in detail below including funding parameters where appropriate.

### **KEY PRINCIPLES OF THE CIL EXPENDITURE FRAMEWORK**

2.3 These are set out in the following Table 1

**Table 1 - Key Principles**

Key Principles of the CIL Expenditure Framework	Further detail where appropriate
1. The process should encourage openness and transparency of decision taking.	The Infrastructure team publish all key information about CIL expenditure on the Councils web site.
2. CIL data must be 100% accurate and software database must have integrity and be “trusted”.	The software that the Council uses is Exacom. There is a public facing module (known as PFM) which is accessible on the Councils website under the tab of developer Contributions database.
3. Decisions must be compliant with the CIL Regulations 2010 (as amended including the CIL Regulations of 2019) and expenditure must follow the yearly Infrastructure Funding Statement for each Council.	The yearly Infrastructure Funding Statement is a legal requirement for all Councils dating from the CIL Regulations 2019 (1 <sup>st</sup> September 2019).
4. The expenditure approach must be legally sound	All reviews of the CIL Expenditure Framework review and CIL Expenditure Programme are reviewed by the Shared Legal Service
5. Deliverability and Timeliness – a “can do” approach towards delivery of infrastructure to be employed (subject to the infrastructure project being in accordance with the CIL Expenditure Framework and the yearly Infrastructure Funding Statement (Infrastructure List) for each Council.	Infrastructure officers can be contacted about all aspects of CIL including CIL expenditure
6. CIL expenditure should support the Joint Corporate Plan, other Council strategies, the Joint Local Plan objectives and the Infrastructure Delivery Plan (which is evidence that underpins the Joint Local Plan) and the Infrastructure Funding Statement for each Council.	This is a requirement of the CIL Expenditure Framework
7. The apportionment of CIL monies into three separate funds: - <ul style="list-style-type: none"> <li>• Strategic Infrastructure Fund,</li> <li>• Ringfenced Infrastructure Fund and the</li> <li>• Local Infrastructure Fund</li> </ul>	<p>The <b>Strategic Infrastructure Fund</b> allows for monies to be saved towards strategic projects for the betterment of either or both Districts and facilitates the prospect of collaborative spend with other funding organisations and/or funding streams to achieve strategic infrastructure.</p> <p>The amount to be saved into the <b>Strategic Infrastructure Fund</b> occurs after the 5% administrative costs are removed and then the Neighbourhood CIL portion of monies is</p>

Key Principles of the CIL Expenditure Framework	Further detail where appropriate
<p>All such apportionment allows saving of monies towards infrastructure projects.</p>	<p>taken out (either 15% for Parishes – (subject to a cap) with no made Neighbourhood Plan or 25% for Parishes (without a cap) where a Neighbourhood Plan is made.</p> <p>Following this 20% of the remaining CIL monies would be saved into the <b>Strategic Infrastructure Fund</b> leaving the remaining 80% to go into the <b>Local Infrastructure Fund</b> (with the exception of the following paragraph which sets out the saving of monies into a <b>Ringfenced Infrastructure Fund</b>)</p>
<p>8.Planning decisions which approve housing (ten dwellings and over) /employment which carries Infrastructure to be provided by CIL and necessary for an approved growth project (those with planning permission) shall be supported and considered a priority and these monies are ringfenced into the Ringfenced Infrastructure Fund. Infrastructure provided to support these schemes ensures that the approved development which is ultimately carried out is sustainable.</p>	<p>This is a requirement of the CIL Expenditure Framework</p>
<p>9. Publication of all expenditure, the twice yearly CIL Expenditure Programme (formerly known as the CIL Business Plan) and the Technical Assessments on the website, means all CIL information is readily accessible and transparent. A list of all valid Bids for CIL monies from either the Strategic Infrastructure Fund Ringfenced Infrastructure Fund or the Local Infrastructure Fund will be published after each Bid round has been closed.</p>	<p>This is a requirement of the CIL Expenditure legislation</p>
<p>10. CIL expenditure will be regularly audited, including the CIL Expenditure Framework Review process.</p>	<p>This is a requirement of the Councils regarding CIL</p>
<p>11. A Communications Strategy for the CIL Expenditure Framework is necessary and constitutes a key document to this Framework and should be read alongside it.</p>	<p>This is a requirement of the CIL Expenditure Framework and is a key document that should be read alongside the CIL Expenditure framework</p>
<p>12.Infrastructure projects that are funded by each Council’s CIL funds (whether from the Strategic, Ringfenced or Local Infrastructure Funds) shall be carried out</p>	<p>This is a requirement of the CIL Expenditure Framework</p>

Key Principles of the CIL Expenditure Framework	Further detail where appropriate
<p>on publicly owned or controlled land/buildings or where public access is guaranteed (unless exceptional circumstances apply). However where leased buildings or land is involved and a CIL Bid is made for infrastructure, the lease must be long (i.e. no shorter than 25 years with a break clause no sooner than 15 years). Shorter leases will normally be regarded as unacceptable.</p>	
<p><b>13. No Member referral of CIL Bid cases to Cabinet for decision taking</b></p>	<p>Governance arrangements contained in this CIL Expenditure Framework for CIL do not permit this.</p>
<p><b>14. Whilst Ward Member(s) of a CIL Bid can ask a question at Cabinet (at the discretion of the Chairman) they may not make representations or join in with the debate at Cabinet.</b></p>	<p>To ensure that the process satisfactorily addresses both Council's Constitution</p>
<p><b>15. Where offers of CIL funds are made to authors of Bids, the monies will be allocated to the infrastructure project for a period of no longer than 2 years whereupon the allocation of funds would be withdrawn and it would be necessary to reapply through the Bid process to secure CIL funds for that project.</b></p>	<p>The CIL Bid Offer letter is a contract and cannot be altered or extended.</p> <p>A new CIL Bid would need to be submitted to continue with the infrastructure project</p> <p>A template to assist with this and a guidance note is available.</p>
<p><b>16. Delivery of infrastructure projects where CIL monies are approved – Where problems arise which threaten the delivery or completion of a project (for reason which may include Covid or where delivery costs exceed Bid amounts or there are delivery issues for legal or other reasons and the scheme cannot be delivered within the 2 year period, it is open to authors of Bids to reapply stating the reasons why delivery has not been fully or partly possible.</b></p> <p><b>A template will be available for Bidders to complete so that their original information can be updated. However, it will be important to resubmit all financial information and complete a CIL Bid application form so that the details of this scheme can be both updated and</b></p>	<p>This is a requirement of the CIL Expenditure Framework</p>

Key Principles of the CIL Expenditure Framework	Further detail where appropriate
<p>considered against the Framework parameters.</p>	
<p><b>17. CIL funds can be used for an infrastructure project to make it Disability Discrimination Act compliant.</b></p>	<p>This is a stipulation of the CIL Expenditure Framework</p>
<p><b>18. All CIL Bids must be discussed with an Infrastructure officer before CIL Bid submission when Bid rounds open. Details of the Infrastructure to be provided must be submitted on a CIL Project Enquiry Form and be completed by all Infrastructure Providers, Parish or Community groups. This will allow for a discussion (and the involvement of District Ward Members, County Councillors and Parishes) and the approach towards the project should be in accordance with the procedures listed elsewhere in this Framework.</b></p>	<p>This is a requirement of the CIL Expenditure Framework</p>
<p><b>19. Agreement to a structured approach to discussions at pre Bid stage for both large infrastructure projects (total costs over £250,000) and medium infrastructure projects (total costs between £50,000-under £250,000) with community engagement with Ward Member(s) Parish Council and Ward County Councillor together with reporting to an Infrastructure Sub Programme Board (of officers). Ward Members to be notified only of receipt of small infrastructure projects (total costs of 50,000 or less). This structured approach is set out in the diagram at the back of this document.</b></p>	<p>This is a requirement of the CIL Expenditure Framework</p>

Key Principles of the CIL Expenditure Framework	Further detail where appropriate
<p><b>20. Continue to ringfence funds for housing developments over 10 dwellings so that the infrastructure to support the growth is provided. However, such CIL monies will only continue to be held for that settlement in the Ringfenced Infrastructure Fund for 5 years.</b></p> <p><b>If no projects come forward for this ringfenced money within that period, it will be returned to the Local Infrastructure Fund for expenditure.</b></p>	<p>This is a requirement of the CIL Expenditure Framework</p>
<p><b>21. Neighbouring communities need to contribute to larger infrastructure projects within settlements (through the use of Ringfenced Infrastructure Funds) where they would be used by the wider area (e.g. catchment areas of schools and together with catchment areas for health hubs and rail together with Strategic Leisure centres) will be considered and brought into the funding strategy so that ringfenced funds for the infrastructure project can be brought forward.</b></p>	<p>This is a requirement of the CIL Expenditure Framework</p>
<p><b>22. Evidence of need for the proposed Infrastructure project must be submitted with all CIL Bids.</b></p>	<p>This is a requirement of the CIL Expenditure Framework</p>
<p><b>23. Parishes and Community groups should show at the time of the submission of any CIL Bids whether they have any of their own funds (including Neighbourhood CIL) that could be used.</b></p>	<p>This is a requirement of the CIL Expenditure Framework</p>
<p><b>24. No 100% funding requests for CIL Bids by Parishes/Community groups for community infrastructure. Maximum limit of £100,000 and 75% (of the total costs) for CIL Bids (per project/CIL Bid) for infrastructure submitted by Parishes or Community groups with the exception of sporting leisure or recreation facilities (see below).</b></p>	<p>These are requirements of the CIL Expenditure Framework</p> <p>(The previous infrastructure threshold for infrastructure led by the community of not more than £75,000 was increased to £100,000 as a result of the fourth review of the CIL Expenditure Framework. These maximum thresholds were reviewed as part of the fifth review and retained without alteration ).</p>
<p><b>25. For sporting and recreation facilities no 100% funding requests and a maximum funding limit on funding of these bids of £200,000 and up to 75% of the total costs of the project whichever is the smaller amount for such infrastructure listed within the IDP for CIL Bids (per project/CIL</b></p>	<p>This is a requirement of the CIL Expenditure Framework</p>

Key Principles of the CIL Expenditure Framework	Further detail where appropriate
<b>Bid.</b> If the project is not listed in the IDP the maximum limit will be £75,000 and 75% (of the total costs) for CIL Bids (per project/CIL Bid).	
<b>26. Minimum CIL Bid of not less than £2000 on Infrastructure submitted by all Infrastructure Providers and Parishes and Community groups.</b>	This is a requirement of the CIL Expenditure Framework
<b>27. In respect of CIL Bids from Parishes and Community groups for Community Infrastructure, CIL Bids arising from a PIIP (Parish Investment Infrastructure Plan) will not be prioritised over those coming from a Parish without one.</b>	<p>Parish Investment Infrastructure Plans (PIIPs) are a “conversation starter” and will not be mandatory to gain CIL funds. They are a tool for Parish Councils and are informal guidance documents only.</p> <p>They are encouraged as a useful way of prioritising local infrastructure.</p> <p>(The Councils will consider publishing PIIPs on the Website as help to other Parishes in the future).</p>
<b>28. Monthly meetings between the Councils Infrastructure officers and Infrastructure providers will take place to develop an Infrastructure delivery programme (e.g., for Rail, Health and Suffolk County Council – Education and Bus Passenger transport). Monthly meetings may also occur with other Councils to discuss cross boundary infrastructure issues and to address infrastructure mitigation.</b>	This is a requirement of the CIL Expenditure Framework
<b>29. Those CIL Bids that are within either the Infrastructure Delivery Plan (IDP), each Council’s Infrastructure Funding Statement (IFS) and/or part of a Corporate Local Plan or as part of a Council Strategy will have greater weight when prioritisation criteria are used in the technical assessments of each CIL Bid. In addition, greater weighting towards Bids will be given where those CIL Bids align with spend with priorities designated in JLP/IDP/IFS and Neighbourhood Plans and District Council infrastructure projects.</b>  <b>Agreed critical/ essential infrastructure identified in the IDP/IFS will carry more weight than desirable infrastructure.</b>	These are requirements for judging CIL Bids under the CIL Expenditure Framework
<b>30. No monies will be awarded through a CIL Bid towards costs which have already been paid for a project (i.e. no claiming</b>	This is a requirement of the CIL Expenditure Framework



Key Principles of the CIL Expenditure Framework	Further detail where appropriate
retrospectively) -except where school extensions are planned as part of a pupil placement creation which is a statutory function on the part of Suffolk County Council – these costs to include design and build costs and costs for the making of a planning application – see paragraph 3.1 of the CIL Expenditure Framework).	
<b>31. Feasibility costs will be awarded for rail feasibility studies only where a rail infrastructure project is critical/essential in the Infrastructure Delivery Plan (IDP) and definite in delivery terms (and one which the Council would be likely to support (i.e. for instance it is listed as critical/essential in the IDP).</b>	This is a requirement of the CIL Expenditure Framework
<b>32. Improvement or replacement of existing infrastructure (forming part of and /or total) must include a statement on additionality (some significant tangible betterment of the existing facility) must be involved otherwise the works would be termed to be maintenance or repair and therefore not eligible under the CIL Expenditure Framework. This must be more than the materials will represent an upgrade. For example, like for like replacement is not a strong enough example of an upgrade it must address additionality.</b>	This is a requirement of the CIL Expenditure Framework
<b>33. Churches are not excluded from CIL funding (despite there being many other funding opportunities for Churches) but proposed projects must be for infrastructure and the proposal must benefit the community in the widest sense by offering wide community benefits and be capable of being used by the whole community Any Bids must also address additionality (see above) and not include maintenance or church restoration costs.</b>	This is a requirement of the CIL Expenditure Framework
<b>34. Public electric vehicle charging points will be classed as community facility infrastructure. However, they are seen as a District wide benefit and will therefore be treated as an exception to the maximum limit on community facility infrastructure.</b>	This is a requirement of the CIL Expenditure Framework
<b>35. Best value criteria should include land values where CIL Bids involve purchase of land for infrastructure.</b>	This is a requirement of the CIL Expenditure Framework

Key Principles of the CIL Expenditure Framework	Further detail where appropriate
<p><b>36. CIL Bids that have green and sustainability characteristics shall carry greater weight in determination terms than those CIL Bids which do not.</b></p>	<p>These are requirements for judging CIL Bids under the CIL Expenditure Framework</p>
<p><b>37. If a CIL Bid is invalid upon submission opportunity will be given for the next 12-month period (from the date of its submission) to be made valid. If it is still invalid after the expiry of the 12-month period, the CIL Bid will be treated as withdrawn and no formal decision (Cabinet or delegated) will be made on it.</b></p>	<p>This is a requirement of the CIL Expenditure Framework</p>
<p><b>38. Spending outside each Councils geographical boundaries is acceptable where appropriate to the circumstances of the infrastructure to be provided and where there is clear benefit to the residents of either or both Districts. Additional parameters and criteria relating to this expenditure are contained in this Table 2 below.</b></p> <p><b>In addition, it may be necessary for each Council to seek CIL or s106 contributions for infrastructure where impacts upon either Councils infrastructure is impacted upon by development outside its administrative geographical boundaries. The Councils approach to secure such contributions is set out in Table 3 below.</b></p>	<p>These are requirements of the CIL Expenditure Framework</p>

**CIL Expenditure Outside of Each Councils Administrative Geographical Boundaries Where Development Occurs Within Babergh And Mid Suffolk And Which Results In An impact On Infrastructure Beyond Its Boundaries.**

2.4 Where this occurs, it will be necessary to complete an appropriate CIL Bid application form and its consideration must adhere in all respects to the principles processes, prioritisation criteria and governance arrangements within this CIL Expenditure Framework. In addition, it will to necessary to provide information to meet the following requirements /parameters set out in the following Table (Table 2).

**Table 2 - Key Principles of CIL Expenditure for Infrastructure Beyond Babergh's And Mid Suffolk's Administrative /Geographical Boundaries**

Key Principles of the CIL Expenditure Framework	Further detail where appropriate
1. Must be collaboratively funded Bids – Babergh/Mid Suffolk will not contribute 100%.	This is a requirement of the any CIL Bid to be considered under the CIL Expenditure Framework
2. Babergh's and Mid Suffolk's spend must be proportionate to what is being provided and linked by way of evidence to impacts of growth within BDC and MSDC and must address evidence-based impacts.	This is a requirement of the any CIL Bid to be considered under the CIL Expenditure Framework
3. Must be specific deliverable projects with timescales and oven ready schemes with all necessary formal approvals in place.	This is a requirement of the any CIL Bid to be considered under the CIL Expenditure Framework
4. Babergh and Mid Suffolk must be final funding part of the jig saw so that money is not tied up in projects that will not be delivered.	This is a requirement of the any CIL Bid to be considered under the CIL Expenditure Framework
5. Must be capital based specific infrastructure projects that address growth impacts.	Otherwise, this would be termed outside the CIL Expenditure Framework
6. Will not fund projects which are not infrastructure.	This is termed outside the terms of the CIL Expenditure Framework
<p>7. Specific infrastructure projects must be listed in the Infrastructure Delivery Plan and within the Infrastructure Funding Statement (Infrastructure List) for Districts where spend is going to occur and be developed through Statements of Common Ground or through collaborative work with neighbouring Local Authorities.</p> <p>Consider whether the infrastructure mitigation required is classed as essential within the other Districts Infrastructure Delivery Plan, Infrastructure Funding Statement and Statement of Common Ground.</p> <p>Collaborative spend outside the District shall be limited to Infrastructure Provider projects only.</p>	These matters will be important considerations in any decision on any CIL Bid
8. Same engagement process for spends over £50,000 with Parish Councils Ward Members and County Councillors as set out elsewhere in this Framework.	This is a requirement of the any CIL Bid to be considered under the CIL Expenditure Framework

<b>Key Principles of the CIL Expenditure Framework</b>	<b>Further detail where appropriate</b>
<b>9. All spend shall be Cabinet decisions with no delegated decisions.</b>	This is a requirement of the any CIL Bid to be considered under the CIL Expenditure Framework
<b>10. Technical Assessment for such CIL Bids shall include a separate section where spend outside the District to responds to the additional key principles in this Table (Table 2).</b>	This is a requirement of the any CIL Bid to be considered under the CIL Expenditure Framework
<b>11. Normal Bid round process twice a year will apply.</b>	This is a requirement of the any CIL Bid to be considered under the CIL Expenditure Framework
<b>12. CIL Project Enquiry form must be submitted to allow discussions to take place before formal CIL Bid submission.</b>	This is a requirement of the any CIL Bid to be considered under the CIL Expenditure Framework
<b>13. It will be necessary to demonstrate that the infrastructure cannot be provided through other funding and practicable means (including through culminative growth means).</b>	This is a requirement of the any CIL Bid to be considered under the CIL Expenditure Framework
<b>14. All such CIL Bids must come from adjoining Local Authorities or Infrastructure Providers. Any requests from Parishes Community Groups/other organisations (such as Health Hubs, Schools) outside Babergh and Mid Suffolk administrative boundaries will be regarded as falling outside the terms of our CIL Expenditure Framework and not eligible for the submission of CIL Bids.</b>	This is a requirement of the CIL Expenditure Framework

2.5 Both Councils will seek to secure s106 monies or CIL for cross boundary development impacts upon infrastructure within our Babergh and Mid Suffolk where impacts are caused by development beyond Babergh and Mid Suffolk's administrative geographical boundaries. The following approach will be used as set out in Table 3.

**Table 3 - Key Principles of Seeking to Secure s106 and /or CIL Contributions For Development Impacts Upon Infrastructure Within Babergh And Mid Suffolk Are Caused By Development Beyond Babergh And Mid Suffolk's Administrative Geographical Boundaries.**

<b>Key Principles of the CIL Expenditure Framework</b>	<b>Further Detail where appropriate</b>
<b>1. Proactively track developments that are submitted to our neighbouring Districts.</b>	Proactive work required
<b>2. Proactively discuss the impacts with Districts and Counties where appropriate.</b>	Proactive work required
<b>3. Ensure these views are captured in any responses to neighbouring Local authorities' consultations and ensure through discussion our infrastructure and s106 and CIL needs are met.</b>	Proactive work required
<b>4. Track outcomes of these applications and monitor their commencement where appropriate to secure money (whether through s106 or CIL).</b>	Proactive work required
<b>5. Secure s106 and CIL monies and work towards delivery of projects to deliver infrastructure when monies are secured.</b>	This approach continues to be followed
<b>6. Hold regular meetings with adjoining Councils/Infrastructure Providers and work collaboratively.</b>	Such meetings are being held and will continue

#### **Elements of CIL Bids That Will Not Be Classed As Eligible Under This CIL Expenditure Framework.**

2.6 There are some elements of CIL Bids that will not be classed as eligible under this CIL Expenditure Framework. These are set out in the following Table (Table 4).

**Table 4 – Elements of CIL Bids That Will Not Be Classed As Eligible Under This CIL Expenditure Framework.**

<b>Key Principles of the CIL Expenditure Framework</b>	<b>Further detail where appropriate</b>
<b>1. Feasibility studies for infrastructure projects (except for rail infrastructure).</b>	These are termed outside the terms of the CIL Expenditure framework (except for rail infrastructure).
<b>2. Maintenance or repair costs of buildings/ infrastructure/ projects.</b>	These are termed outside the terms of the CIL Expenditure framework
<b>3. Interests on loans for projects.</b>	This is termed outside the terms of the CIL Expenditure Framework
<b>4. No CIL funding for infrastructure that has already been carried out (i.e. retrospectively).</b>	This is termed outside the terms of the CIL Expenditure Framework
<b>5. No payment towards costs which have already been paid and are sought for reimbursement as part of the CIL Bid (except where school extensions are planned as part of</b>	This is termed outside the terms of the CIL Expenditure Framework

Key Principles of the CIL Expenditure Framework	Further detail where appropriate
pupil placement creation which is a statutory function on the part of SCC).	
6. Improvement or replacement of existing infrastructure as part of a project must include additionality (some significant tangible betterment of the existing facility otherwise it would be termed to be maintenance or repair.	This is a requirement of the CIL Expenditure Framework
7. Portable equipment or resources (e.g. books desks tables shelving and associated portable equipment/tools).	These are termed outside the terms of the CIL Expenditure framework
8. Lamp standards, light bulbs, information kiosks, parish notice boards, seats.	These are termed outside the terms of the CIL Expenditure framework
9. Telephone boxes, fire alarms, public drinking fountains, refuse bins or baskets.	These are termed outside the terms of the CIL Expenditure framework
10. Public art/ceremonial structures.	These are termed outside the terms of the CIL Expenditure framework
11. No professional fees or contingency costs.	These are termed outside the terms of the CIL Expenditure framework
12. CIL Bid requests direct from schools – all education funding must be because of a proven education need and CIL Bids will need to be submitted by the County Council. All other education Bids will be outside the CIL Expenditure Framework.	These are termed outside the terms of the CIL Expenditure framework
13. Highway traffic calming and highway/traffic equipment - Both Councils agreed that highway traffic calming measures, pedestrian crossings, village gateway measures and speed reduction measures and traffic equipment are considered as part of the planning process when granting planning permission for development. These are the Highways responsibility and therefore fall outside of the CIL Expenditure Framework for funding purposes. <b>The only exception to this is where funding is being considered for Active travel and LCWIP cycling and walking infrastructure project where it might be necessary to include a highway measure (e.g. like a pedestrian crossing) as part of the project in order to secure the required overall</b>	These are termed outside the terms of the CIL Expenditure framework  <b>The only exception to funding is stated here where it may be necessary to include a highway measure (e.g. like a pedestrian crossing) as part of the project in order to secure the required overall walking and cycling scheme (over and above any other highway measures that might be delivered by</b>

Key Principles of the CIL Expenditure Framework	Further detail where appropriate
<p>walking and cycling scheme (over and above any other highway measures that might be delivered by developments through s106 or under s278 of the Highways Act).</p>	<p>developments through s106 or under s278 of the Highways Act).</p> <p>This exception was included as part of the fifth review of the CIL Expenditure Framework to assist with the delivery of walking and cycling schemes.</p> <p>Parishes that have Neighbourhood CIL could consider using this for their own highway projects.</p>
<p>14. Costs for testing boreholes as part of a feasibility study for a District/Parish heating system</p>	<p>These are termed outside the terms of the CIL Expenditure framework</p>
<p>15. The use of District CIL for community led infrastructure projects involving business proposals/ventures</p>	<p>These are termed outside the terms of the CIL Expenditure Framework</p>
<p>16 It would not be appropriate to use District CIL for Golf facilities as these are normally run as businesses for profit and it would be inappropriate for a private business to benefit from District CIL investment.</p>	<p>This falls outside the terms of the CIL Expenditure framework</p>
<p>17. Clarity around use of District CIL for community pubs – as community pubs are not classed as infrastructure and given the risks around these operations, District CIL cannot be used for such projects and any such proposals are termed to fall outside the terms of the CIL Expenditure Framework and will not be considered eligible for District CIL funding.</p>	<p>This falls outside the terms of the CIL Expenditure framework</p>

**For clarification, the following items are eligible for CIL funding.**

2.7 The following items set out in Table 5 are eligible for CIL funding.

**Table 5 - For Clarification, The Following Items Are Eligible for CIL Funding**

Key Principles of the CIL Expenditure Framework	Further detail where appropriate
1. Hearing loops in village halls, sound bars and projectors which are permanently fixed.	This is termed within the CIL Expenditure Framework
2. Permanent telephony and telecommunication infrastructure required to carry out health services.	This is termed within the CIL Expenditure Framework
3. Parish/Heating system – Suggestion that a community building element (e.g., Village Hall) would be eligible for District CIL funding (even if part of a wider parish scheme). Community infrastructure threshold of £100,000 and not more than 75% of the project costs applies, together with other provisions of the CIL expenditure about being final funder and scheme being oven ready.	This is termed within the CIL Expenditure Framework
4. Eligibility for green infrastructure (Infrastructure which reduces the carbon footprint) – currently EV charging points are supported for up to 100% of project costs with a community infrastructure threshold of £100,000 together with other types of community infrastructure such as District CIL funding for upgrades or additionality for community buildings (but not for repair or maintenance); for example, heating systems, toilet handwashing systems, better roof/wall insulation and roof lights and ventilation (which could replace use or need for air conditioning). Walking and cycling infrastructure through the pilot/period scheme (LCWIPs).	These are termed within the CIL Expenditure Framework
5. Walking and cycling infrastructure through the pilot/period scheme (LCWIPs) - projects in the LCWIPs, ISPA, IDP and IFS –agreed that the pilot period/scheme be continued and operated with 100% District CIL funding for a further one year period until the seventh review of the CIL Expenditure Framework. Proactive work will occur for bringing LCWIP schemes forward. Position on this pilot scheme /period to be reviewed again at next review (seventh) CIL Expenditure Framework.	These are termed within the CIL Expenditure Framework. Both Councils reviewed the position on the pilot scheme /period and agreed that it be continued until the next (seventh) CIL Expenditure Framework review to measure progress methodology and outcomes for deliverability of schemes.



Key Principles of the CIL Expenditure Framework	Further detail where appropriate
<p><b>6. Clarity around charging admittance by the organisation for the infrastructure funded by CIL (museums/art galleries) - Continue to support Infrastructure for museums/art galleries but limited to community threshold levels (of £100,000 and not more than 75% of the total cost of the project). Organisation must have a charitable status and have a 25-year lease and/or the land is public land capable of access by the public.</b></p>	<p>This is termed within the CIL Expenditure Framework</p>
<p><b>7. Clarity around charging admittance by the organisation for the infrastructure funded by CIL (public open space) - For such CIL Bids to be considered as acceptable in principle the land must be in public ownership or leased for 25 years as public open space and the users of the public open space or play equipment should not be required to pay for admittance and the facility must be capable of use by all.</b></p>	<p>This is termed within the CIL Expenditure Framework on the set out parameters</p>
<p><b>8. Clarity around funding investment through District CIL for new pavilions and extensions to Sports clubs, Tennis and Cricket clubs who charge admittance fees for usage subject to all other community infrastructure criteria including the prevailing community threshold limitations of £100,000 (maximum) and not more than 75% of total eligible project costs of the project. A Community User Agreement must be signed by the Sports/Tennis/Cricket Club which should be obtained before any CIL Bid is determined. This should be based on a statement in the CIL Bid application form on the community usage benefits that would accrue from any such CIL Bid. Joint Member Panel Members also agreed that</b></p>	<p>This is termed within the CIL Expenditure Framework on the set out parameters</p>
<p><b>9. Clarity around use of District CIL for community led infrastructure projects involving community shops and cafes run by a properly constituted organisation for non for profit. District CIL can be used for</b></p>	<p>This is termed within the CIL Expenditure Framework on the set out parameters</p>

Key Principles of the CIL Expenditure Framework	Further detail where appropriate
<p>extension/alteration or improvement (for environmental purposes) of publicly owned buildings (Parish Council or Village Hall Management organisations) or such buildings which are the subject of a lease for no shorter period than 25 years for community shops or cafes subject to the following additional limitations/caveats :-</p> <ul style="list-style-type: none"> <li>➤ All the criteria and the prevailing community threshold limitations of £100,000 (maximum) and not more than 75% of total eligible project costs of the project</li> <li>➤ the submission of a business case (for the non for profit project) for a three year period (going forward)containing details of;- <ul style="list-style-type: none"> <li>➤ how the organisation proposing the CIL Bid is properly constituted for non for profit,</li> <li>➤ how the non for profit community shop or café will operate including all expected expenditure for staff /management,</li> <li>➤ how much investment there will be on a yearly basis going forward for repairs and maintenance of the building (to be improved)</li> <li>➤ Where the non for profit asset elements of the community shop or café operation will be invested and what they will be used for such that the community receives maximum benefit from the operation</li> </ul> </li> </ul>	

Key Principles of the CIL Expenditure Framework	Further detail where appropriate
<ul style="list-style-type: none"> <li>➤ Submission of financial accounts for all the previous years if the use is already in existence</li> </ul> <p>In respect of such a non for profit community shop or café project, the following caveats are applicable (given that it would be inappropriate for a private business to benefit from District CIL investment ) :-</p> <ul style="list-style-type: none"> <li>➤ Any successful CIL Bid offer letter for such a CIL Bid will specify there would be no business (for profit) element within the floorspace affected by the CIL Bid.</li> <li>➤ There would also be no sublets for any other business purposes going forward</li> </ul>	
<p><b>10. Review of continued District CIL funding for Churches where capital projects are proposed. Churches can continue to apply for District CIL if there is strong evidence of community involvement through a statement of community involvement which would need to be submitted and assessed with the CIL Bid. Such cases would be considered on a case-by-case basis and in accordance with all other provisions of the CIL Expenditure Framework (including being subject to community led infrastructure project financial thresholds - -£100K maximum and not more than 75% of the total eligible project costs). (Repairs and maintenance would continue to be classed as not eligible for District CIL expenditure.)</b></p>	<p>Changes made to the CIL Expenditure Framework as a result of the sixth review of the CIL Expenditure Framework</p>
<p><b>11. Clarity around use of District CIL for District Council infrastructure projects - Continue with the current agreed position on District CIL usage for District Council infrastructure projects (i.e. that projects can be funded 100%).</b></p>	<p>Changes made to the CIL Expenditure Framework as a result of the sixth review of the CIL Expenditure Framework</p>

Key Principles of the CIL Expenditure Framework	Further detail where appropriate
<p>Review the Councils Capital programme so that capital projects where District CIL could be used for infrastructure are identified such that District CIL becomes part of the funding strategy for those projects</p>	
<p><b>12. Clarity around the use of District CIL for Early years settings – Given the likely impact of new reforms (the increase to 30 hours of free childcare for children aged 9 months to 4 years old, the following in respect of District CIL expenditure is agreed:-</b></p> <ul style="list-style-type: none"> <li>➤ <b>S106 contributions will need to be sought for new buildings</b></li> <li>➤ <b>District CIL can support extensions of existing schools where early years settings are part of the school</b></li> <li>➤ <b>District CIL cannot be used for business purposes so is not expected to be used to support privately run ventures</b></li> </ul> <p>In view of the three funding caveats above, this situation which is evolving should be kept under regular (yearly) review as there could be significant implications for the use of District CIL and the Infrastructure Delivery Plan (IDP).</p>	<p>Changes made to the CIL Expenditure Framework as a result of the sixth review of the CIL Expenditure Framework</p>

## 5. PROCESSES OF THE CIL EXPENDITURE FRAMEWORK

5.1 The CIL Expenditure Framework will operate with the following approach as set out in the following Table (Table 6).

**Table 6 – Key Processes of the CIL Expenditure Framework**

Key Processes of the CIL Expenditure Framework	Further detail where appropriate
<p><b>1. Use of the Councils’ existing software.</b></p>	<p>The software that the Council uses is Exacom. There is a public facing module (known as PFM) which is accessible on the Councils website under the tab of developer Contributions database</p>
<p><b>2. The process is centred upon a bidding round with consideration on a twice-yearly basis, with email submission of bids by Infrastructure Providers (including officers of Babergh and Mid Suffolk where appropriate) and all Parishes including Community Groups.</b></p>	<p>See Diagram at Appendix B to the rear of this report.</p> <p>This is a requirement of the CIL Expenditure legislation</p>
<p><b>3. Full documentation of the process for lodging, consideration, and determination of the bids with supporting guidance documents for bid submission, bid application forms and prioritisation criteria to be used for assessment of the bids will be made available on the Councils’ websites.</b></p>	<p>This is a requirement of the CIL Expenditure legislation</p>
<p><b>4. The timetable for the twice-yearly bid process will be clearly documented on the Councils’ websites together with the inclusion of a flow chart. Three months of early advance notification of bid submission timescales (to facilitate bid submission) to all Infrastructure Providers (including officers of Babergh and Mid Suffolk where appropriate) and all Parish/Town Councils. Bids from Community Groups can also be submitted.</b></p>	<p>The timetable can be found at Appendix B to the rear of this document.</p> <p>There is also a yearly Key dates CIL calendar which can be seen on the Councils web site</p>
<p><b>5. The apportionment of CIL monies into three funds; Strategic Infrastructure Fund, Ringfenced Infrastructure Fund and Local Infrastructure Fund will occur twice yearly.</b></p> <p><b>This apportionment in particular allows saving of monies towards strategic infrastructure projects for the betterment of either or both Districts and facilitates the prospect of collaborative spend with other funding organisations and or funding streams to achieve strategic infrastructure.</b></p>	<p>Examples of the type of Infrastructure to be funded through the Strategic Infrastructure Fund, the Ringfenced Fund and the Local Infrastructure Fund can be found at Appendix A to the rear of this document.</p> <p>The way that both Councils store their money in separate names accounts is a requirement of the CIL Expenditure Framework.</p>

Key Processes of the CIL Expenditure Framework	Further detail where appropriate
<p>The division of monies between the three funds occurs in April and October each year immediately after the apportionment of/ payment of Neighbourhood CIL.</p>	
<p>6. All interest accrued on CIL monies will be paid into the Strategic Infrastructure Fund pot.</p>	<p>This is a requirement of the CIL Expenditure legislation</p>
<p>7. Distribution of CIL income - The Councils will retain up to 5% of the CIL income received within each District (for administrative costs). This will be apportioned at the same time as the Neighbourhood CIL allocation to Parishes. The Neighbourhood CIL allocation to Parish/Town councils (either 15% or 25% subject to a cap*) occurs in April and October each year. On the same 6 monthly basis, the CIL funds will be saved into three separate funding streams with the following apportionment and definitions: -</p> <ul style="list-style-type: none"> <li>• Strategic Infrastructure fund – 20 % of the CIL funds will be held in this account</li> <li>• Ringfenced Infrastructure Fund - ringfenced monies to deliver infrastructure to support housing schemes of 10 dwellings and above)</li> <li>• Local Infrastructure fund – 80% of the CIL funds will be held in this account</li> </ul>	<p>The Cap is explained in Appendix C to the rear of this document</p> <p>The way that both Councils store their money in separate names accounts is a requirement of the CIL Expenditure Framework.</p>
<p>8. Apportionment of Neighbourhood CIL. Currently six-monthly allocations to Parish/Town Councils (which occur in April and October) continue, and where Neighbourhood CIL is received, a proactive approach is used to encourage collaborative spend (using Parish Infrastructure Investment Plans (PIIP) documents if produced). The Parishes apportionment of CIL monies (set out in the CIL Regulations 2010 (as amended) will remain at 15% (where there is no Neighbourhood Plan) and 25% where a Neighbourhood Plan is made for three reasons: -</p> <ul style="list-style-type: none"> <li>• to safeguard the ability to secure strategic infrastructure and make the</li> </ul>	<p>This is a requirement under the CIL Regulation legislation and the terms of the CIL Expenditure Framework</p>

Key Processes of the CIL Expenditure Framework	Further detail where appropriate
<p>20% saving from the CIL funds into the Strategic Infrastructure Fund</p> <ul style="list-style-type: none"> <li>• to ensure that the CIL infrastructure requirements on the growth projects are met such that development is therefore sustainable</li> <li>• to meet legislative requirements.</li> </ul> <p>9. Collaborative approach towards expenditure working with Infrastructure Providers and Parishes to get projects delivered and to “add value” is important and supported.</p>	
<p>10. Explore and secure funding from other external funding streams (e.g., LEP and Government funding) and other internal funding streams (s106 monies Community Grants and where appropriate Locality funding) to spend alongside CIL where appropriate, especially in connection with Strategic Infrastructure projects but also for Ringfenced Infrastructure and Local Infrastructure Fund projects. Proactive work will be needed to identify and secure strategic infrastructure projects for both Districts.</p>	<p>This is a requirement under the CIL Expenditure Framework</p>
<p>11. Funding bids must provide adequate evidence/information to provide necessary certainty on timely delivery – “oven ready” schemes will be given priority.</p>	<p>This is a requirement under the CIL Expenditure Framework</p>
<p>12. Proactive work will also need to occur around CIL infrastructure such that the Infrastructure to be provided by CIL Funds (together with the s106 items) are known (and can be understood in terms of viability and the level of affordable housing to be provided). This work will provide clarity around Bids which are likely to come forward for growth projects in the future.</p>	<p>Proactive work required</p>
<p>13. The production and publication of at least twice yearly CIL Expenditure Programmes for both Councils (normal production/publication within 6 months of the Bid rounds opening.</p>	<p>This is a requirement under the CIL Expenditure Framework</p>

<b>Key Processes of the CIL Expenditure Framework</b>	<b>Further detail where appropriate</b>
<b>14. CIL monies can be spent flexibly alongside s106 monies, Community grants and Locality monies and any other external or internal funding streams but expenditure of s106 monies must be in accordance with the terms of the s106 agreement.</b>	This is a requirement under the CIL Expenditure Framework and the use of all s106 monies must be in accordance with the terms of the particular s106 Obligations where the monies are held
<b>15. Tiered approach to decision-taking involving some officer delegation and larger decisions by Cabinet.</b>	This is a requirement under the CIL Expenditure Framework
<b>16. All CIL Bid decisions to be final.</b>	This is a requirement under the CIL Expenditure Framework
<b>17. No appeals process in respect of any CIL Bid decisions.</b>	This is a requirement under the CIL Expenditure Framework
<b>18. Only one Bid per project and per bidding round.</b>	This is a requirement under the CIL Expenditure Framework
<b>19. After a refusal – no more Bids for this project unless funding circumstances are materially different and/or a time period passes of not less than 1 year.</b>	This is a requirement under the CIL Expenditure Framework
<b>20. Where Bids are to be submitted, evidence of Community support shall be required (From Division County Councillor, District Ward Member and Parish Council).</b>	This is a requirement under the CIL Expenditure Framework
<b>21. Validation - Once Bids are validated and screened (see below) Officers will direct any appropriate Bids towards other funding streams where this is considered to be more appropriate (each Councils unspent s106 monies – where the terms of the Legal Obligation would allow that spend to occur. In addition, work will be undertaken to see if other funding can be pulled into the scheme from internal (Community grants and Locality Funds - where appropriate) and external funds (LEP Government funding and other external sources) so that the CIL funds can be distributed as widely as possible.</b>	This is a requirement under the CIL Expenditure Framework
<b>22. Yearly report on CIL and s106 expenditure will be required as part of the CIL Regulations 2019. This document known as an Infrastructure Funding Statement (IFS)</b>	This is a requirement under the CIL Expenditure Framework



Key Processes of the CIL Expenditure Framework	Further detail where appropriate
<p>will need to be produced by the 31<sup>st</sup> December each year for each Council in addition to the at least twice yearly CIL Expenditure Programme for each Council.</p>	
<p>23. Payment of successful bids to be in accordance with CIL guidance to be published on the Councils' websites.</p>	<p>This is a requirement under the CIL Expenditure Framework</p>
<p>24. For all Community Infrastructure Bids three quotes to carry out the works will be required. These quotes must be offered to the Bidders and then submitted as part of the Bids on the basis that the cost of the works will remain held and not vary for a 1-2-month basis. (so as to be sure that when CIL monies are offered the project can be completed for the cost of the works submitted).Where Infrastructure Providers (such as Suffolk County Council -SCC) submit Bids for either education projects or bus passenger transport improvement proposals there will be no need to submit three quotes as Suffolk County Council is as an Infrastructure provider which has a contractual framework agreement in place. This ensures that the project will achieve Best value and thereby meet Best value objectives within the CIL Expenditure Framework. With regard to Bids for school extensions and education facilities (that are contained within the CIL Position Statement), the Infrastructure provider must pay for feasibility studies and planning application costs prior to the CIL Bid being made. Once any such Education CIL Bids are submitted these costs can then be included in the overall cost of the project (so these costs are recovered by SCC as part of the agreed project).</p>	<p>This is a requirement under the CIL Expenditure Framework</p> <p>The requirement to hold financial quotes for 1-2 month period only was varied under the fifth review of the CIL Expenditure Framework. Both Councils also agreed that updated quotes could be sought, if necessary, before decisions are made on CIL Bids.</p>
<p>25. Consultation on CIL Bids - Consultation will occur with the District Ward Member the Division County Councillor for the Ward affected and the Parish Council for that ward (except where the Parish Council is the Bidder for the Infrastructure project). The Consultation will occur by email and 14 days will be allowed for the submission of</p>	<p>This is a requirement under the CIL Expenditure Framework. The fifth review of the CIL Expenditure Framework and the CIL Expenditure Communication Strategy now allows the opportunity for Consultation to occur earlier than where a CIL Bid is made valid.</p>

Key Processes of the CIL Expenditure Framework	Further detail where appropriate
<p>comments. A copy of the CIL Bid application form and a location plan will be sent to the consultee. Infrastructure officers will carry out a site inspection and photographs will be taken.</p>	
<p><b>26. Determination of especially important Strategic Infrastructure Fund, Ringfenced Infrastructure Fund or Local Infrastructure Fund CIL Bids by Cabinet or using delegated powers (requiring approval or refusal or noting by Cabinet) can occur in advance of the normal twice yearly CIL Expenditure Programme process where appropriate.</b></p>	<p>This is allowed under the requirements of the CIL Expenditure Framework</p>
<p><b>27. Technical assessments of all CIL bids where decisions are being made will be undertaken and published as part of the CIL Expenditure Programme documentation so that decision taking is open and transparent.</b></p>	<p>This is a requirement under the CIL Expenditure Framework</p>
<p><b>28. Infrastructure for Community use – a CIL Project Enquiry form has been devised to allow early advice and support to be given to Parishes and Community groups where projects are identified (whether for CIL or other forms of funding) This must be used before any CIL Bid is submitted so that the structured approach towards infrastructure project development can commence before a CIL Bid is submitted and determined.</b></p>	<p>This is a requirement under the CIL Expenditure Framework. Under the fourth review of the CIL Expenditure Framework this CIL project enquiry form has been amended to allow for submission of more information and thereby more effective starts to project development for CIL funding.</p>
<p><b>29. Further amplification is contained in this document relating to the criteria for Value for money (or Best Value) - to address the internal Audit requirements of September 2018.</b></p>	<p>This is a requirement under the CIL Expenditure Framework</p>
<p><b>30. CIL Bid application forms are available on the Councils web site as follows: -</b></p> <ul style="list-style-type: none"> <li>• <b>CIL Bid application forms designed for community infrastructure projects both above and below the governance threshold of £10,000 to address different information requirements (e.g., a Business case where required)</b></li> </ul>	<p>The submission of CIL Bid application forms is required under the CIL Expenditure Framework and guidance forms are placed on the web site to help Bid authors.</p>

Key Processes of the CIL Expenditure Framework	Further detail where appropriate
<ul style="list-style-type: none"> <li>• CIL Bid application forms for Passenger Transport Improvement (shorter than before also recognising and adapting the Framework such that three quotes are not required as there is a contractual framework agreement in place for delivery which meets best value objectives)</li> <li>• CIL Bid application forms for Health facilities /proposals.</li> <li>• CIL Bid forms for Education facilities proposals.</li> <li>• CIL Bid forms for Library improvement/expansion projects.</li> <li>• Rail Bid forms for Rail infrastructure projects.</li> <li>• CIL Bid forms for adjoining Councils and Infrastructure Providers (outside of Babergh /Mid Suffolk’s administrative geographical boundaries</li> </ul>	<p>New forms added as part of the fifth review of the CIL Expenditure Framework</p>
<p><b>31. Engagement process for all CIL Bids over £50,000 and all CIL Bids where expenditure is required beyond Babergh and Mid Suffolk’s administrative and geographical boundaries as follows: -</b></p> <ul style="list-style-type: none"> <li>• A structured approach to discussions at pre Bid stage for both large (over £250,000) and medium (between £50,000-under £250,000) infrastructure projects with stakeholder engagement with Ward Member(s) Parish Council and Ward County Councillor (Stage 1) together with development of the project with all those parties (Stage 2) with both stages being signed off by an Council Infrastructure Sub Programme Board together with a third stage which represents project sign off before a CIL Bid is submitted.( The inception stage (stage 1 will have a project Initiation Document). Stage 2 will have a Development of Infrastructure project document. The third stage will have a</li> </ul>	<p>This is a requirement under the CIL Expenditure Framework</p>

Key Processes of the CIL Expenditure Framework	Further detail where appropriate
Sign off stage document before the submission of the CIL Bid).	
32. Copies of all CIL Bid application forms and a location plan for both Districts will be held on the Councils IT software (which is accessible to District Council Members only through Connect).	For ease of reference or all District Ward Members
33. Different portions of funding making up the total cost of a project shall be included in the CIL Expenditure Programme.	This is a requirement under the CIL Expenditure Framework
34. CIL Expenditure Programme should have Bid Offer date added so that the two year period for the offer is visible (so that the expiry of the CIL Bid offer letter and the ultimate delivery of the project is readily apparent and can be easily cross referenced).	This is a requirement under the CIL Expenditure Framework
35. Continue with monthly meetings with Infrastructure providers to develop an Infrastructure delivery programme (of five years). Publish a list of projects which is being developed called the Emerging Infrastructure Projects in the CIL Expenditure Programme.	These are requirements under the CIL Expenditure Framework. (Five year Infrastructure delivery programme requirement with Infrastructure providers brought in during the fourth review of the CIL Expenditure Framework)
<p>36. CIL Bid Guidance for application forms will include guidance on how the Council will pay the CIL monies, what information and approach is needed before monies are paid together with the need for photographs of part completed/completed infrastructure projects.</p> <p>This guidance will also explain the Ringfenced Infrastructure Fund and the role of the planning consultation responses on infrastructure</p> <p>Improved guidance on Neighbourhood CIL to be issued to Parishes and District Council Members.</p>	These are requirements under the CIL Expenditure Framework
37. Once CIL Bids are valid – the screening part of process commences– i.e., where CIL Bid is valid, screen all other opportunities for other forms of funding (external/unspent s106/community grant/neighbourhood CIL).	These are requirements under the CIL Expenditure Framework

Key Processes of the CIL Expenditure Framework	Further detail where appropriate
<p>Ensure that the outcomes of these other funding opportunities are known before committing to CIL expenditure so that CIL is last piece of jigsaw puzzle.</p> <p>Bidders are encouraged to explore all possible alternatives for other sources of funding alongside requests for CIL funding including using crowd funding/encouraging donations/gifts. (Other sources of funding that could also be considered are loans or Public Works Loan Board funding).</p> <p>Ensure that all other sources of funding have been secured so that CIL funding is the last piece of the jigsaw so that the scheme can be delivered.</p>	
<p><b>38. CIL Bids will be treated as withdrawn if no progress is made after 12 months and no further action will be taken on them (does not stop a resubmission).</b></p>	<p>This is a requirement under the CIL Expenditure Framework</p>
<p><b>39. Where a Bid is refused, the Councils will not reconsider an identical CIL Bid.</b></p>	<p>This is a requirement under the CIL Expenditure Framework</p>
<p><b>40. Provide a list of changes following the first second, third, fourth and fifth reviews of the CIL Expenditure Framework at the rear of the document outlining key changes to the Framework</b></p>	<p>This is a requirement under the CIL Expenditure Framework</p>
<p><b>41. Retain three advance emails to Parishes and infrastructure providers but stress the importance of the structured pre submission process.</b></p>	<p>This is a requirement under the CIL Expenditure Framework</p>
<p><b>42. Where infrastructure being proposed also carries a dual use (such as education provision which would also be used by the community) the completion of a Community User Contract is required so that the community use can be guaranteed. (This will be a bespoke legal Contract designed to suit the circumstances of the CIL Bid case.</b></p>	<p>This is a requirement under the CIL Expenditure Framework</p>
<p><b>43. Next (seventh) review to occur at the same time as Bid round 14 (October 2024) and be in place before Bid round 15 (May</b></p>	<p>This is a requirement under the CIL Expenditure Framework (following the sixth review of the CIL Expenditure framework)</p>

Key Processes of the CIL Expenditure Framework	Further detail where appropriate
2024). The Joint Member Panel will remain to inform this seventh review.	
44. All existing undetermined CIL Bids which are held over until CIL Bid round 7 – May 2021 (from Bid round 6 - October 2020 or any of the other earlier Bid rounds) and included as undetermined in the CIL Expenditure Programme will have a “one Bid round opportunity” to be determined following Bid round 6 without reference to any newly imposed restrictions following the third review of this Framework.	This is a requirement under the CIL Expenditure Framework
45. Improvements to the Website by the inclusion of a district wide map for both Districts to show where District CIL has been spent and a photographic reel of infrastructure projects showing before and after pictures and information of completed infrastructure projects where District CIL has been used.	This is a requirement under the CIL Expenditure Framework
46. Catchment areas for proposed infrastructure (e.g., schools, rail, health hubs) – Use of Ringfenced monies Where infrastructure delivery is proposed through the submission of CIL Bids, the financing of these Bids when recommended to Cabinet or through delegated decisions will be undertaken by using Ringfenced monies first, supplemented by use of Strategic or Local Infrastructure Funds secondly if necessary (if additional funds required). Catchment areas where defined for education projects will be used (e.g., education). For rail projects agreed that we look as widely as possible for funding for rail projects including from Network Rail. Rail infrastructure is strategic in nature (see CIL Expenditure Framework) so this fund together with Ringfenced funds in a reasonable catchment area together with s106 funds from the adjoining Councils would be the way forward as a funding strategy. For health projects investigate where patients come from attending the health hub and take a proportionate approach towards contributions from the Ringfenced funds for those parishes served	This is a requirement under the CIL Expenditure Framework

Key Processes of the CIL Expenditure Framework	Further detail where appropriate
<p>by the extended Hub including the parish where the health hub is based. Investigate whether any s106/CIL can be secured from adjoining Councils for health hubs expansions which are close to both Districts boundaries.</p>	
<p>47. Catchment areas for proposed infrastructure (infrastructure led and provided by the Community) – Use of Ringfenced monies for that Parish, and where insufficient or no funds exist use Local Infrastructure fund.</p>	<p>This is a requirement under the CIL Expenditure Framework</p>
<p>48. Encourage greater spending of CIL (including Neighbourhood CIL). Continue with current proactive approaches towards expenditure and progression of CIL Bids and in addition, produce capital project workplans (for next 5 years) with other infrastructure providers (Health, SCC Waste etc). In addition, number of CIL briefings per year to increase from two to three for both Members and also Parishes (with Members in attendance at Parish events, if desired). Review alongside the IFS where Neighbourhood CIL spend is occurring and if necessary, carry out focused discussion with the Parish about capital CIL projects that are underway. Better targeted website advice with specific guidance note to aid project development as well as PIIPs (Parish Investment Infrastructure Plans) development. Look at the “chipping in” of Neighbourhood CIL – on a case-by-case basis.</p>	<p>This is a requirement under the CIL Expenditure Framework</p> <p>Changes made to the associated CIL Expenditure Framework Community Strategy (in respect to frequency of member and Parish briefings) as a result of the fourth review and continued in the fifth of the CIL Expenditure Framework</p>
<p>49. Delivery of Library improvements /extensions – these can be supported through CIL Bids for District CIL where there is proven evidenced need for improvement /expansion. Such proposals for funding would be treated in the same way both Councils treat education proposals (wrapping up design costs in the final funding application). (New CIL Bid forms required for library improvement/expansion proposals – see Table 6 paragraph 30 above.)</p>	<p>Changes made to the CIL Expenditure Framework as a result of the fifth review of the CIL Expenditure Framework</p>

Key Processes of the CIL Expenditure Framework	Further detail where appropriate
<p><b>Library projects must continue to be linked to business case based on housing growth and all CIL Bids and their funding strategies to be agreed prior to submission through the emerging CIL Bid process. Design costs will not be claimed by SCC if there is ultimately no intention by SCC to deliver that library project</b></p> <p><b>New libraries funding would need to be sought through s106 funding.</b></p> <p><b>In all cases projects for a new Library provision would need to be sought through s106 funding (rather than District CIL.</b></p>	<p>Changes made to the CIL Expenditure Framework as a result of the sixth review of the CIL Expenditure Framework</p> <p>Changes made to the CIL Expenditure Framework as a result of the sixth review of the CIL Expenditure Framework</p> <p>Changes made to the CIL Expenditure Framework as a result of the sixth review of the CIL Expenditure Framework</p>
<p><b>50. Use of Claw Back (for the return of District CIL funding) where risks indicate that it would be both appropriate and reasonable. Both Councils agreed that a claw back provision was sensible when the risks or circumstances dictated that its use was appropriate (acknowledging that these cases were likely to be few and far between and the period of the claw back would be determined on a case by case basis).</b></p>	<p>Changes made to the CIL Expenditure Framework as a result of the fifth review of the CIL Expenditure Framework</p>
<p><b>51. With all car park proposals/projects, the alterations must be made to the CIL bid forms to allow for statements to be made by the CIL Bidder (at the time of the CIL Bid) about the use of EV charging points and cycle provision (cycle parking/racks)</b></p>	<p>Changes made to the CIL Expenditure Framework as a result of the sixth review of the CIL Expenditure Framework</p>
<p><b>52 Review of Approved and Implemented CIL Bid Projects –Infrastructure Officers will carry out a review of completed CIL Bid projects which would also ensure they are being satisfactorily used in accordance with any Community User Agreement which is in place. This review process will be trialled for a one year period (over 2024) (to determine its effectiveness and to gain feedback for the next CIL Expenditure Framework) as follows;-</b></p>	<p>Changes made to the CIL Expenditure Framework as a result of the sixth review of the CIL Expenditure Framework</p>



Key Processes of the CIL Expenditure Framework	Further detail where appropriate
<ul style="list-style-type: none"> <li>➤ Recommend review comprises a questionnaire and a follow up meeting with the CIL Bidder a year after the completion of the project.</li> <li>➤ Where any problems are identified (such as any projects community benefits having not yet been realised), Infrastructure Officers will work with the CIL Bidder, the Ward Member and the Town/Parish Council so that any problems can be resolved in a positive and constructive way (rather than in any financially punitive way).</li> </ul>	
<p><b>53. In respect of CIL Bid Offers and Claims for payment (mainly Community Led development) Infrastructure officers will:-</b></p> <ul style="list-style-type: none"> <li>➤ Infrastructure Officers amend practices and procedures and strengthen communication with CIL Bidders.</li> <li>➤ Infrastructure Officers review the CIL Bid Offer letter (including list of eligible and non-eligible costs).</li> <li>➤ Infrastructure Officers Improve the formal briefings to Members and Parishes to highlight and address identified issues.</li> </ul>	<p>Changes made to the CIL Expenditure Framework as a result of the sixth review of the CIL Expenditure Framework</p>

**6. Validation and Screening of Bids And Prioritisation Criteria of Bids Under The CIL Expenditure Framework (To Allow CIL Bids To Be Considered And Determined)**

6.1 Each Bid will be validated, screened, and prioritised and a technical assessment will be completed (and ultimately published on the web site as part of the CIL Expenditure Programme documentation) taking the following into account:

6.2 **Validation criteria for CIL Bids** is set out in the following table (Table 7).

**Table 7 – Validation Criteria**

Validation Criteria for CIL Bids	Further detail where appropriate
<p><b>1. The correct CIL Bid form must be submitted. All the questions on the Bid application form must be fully completed (where information known or where additional information is required (e.g. Business Case) together with evidence of need for the infrastructure).</b></p>	<p>These elements are the validation criteria for the CIL Bid process</p>
<p><b>2. Valid Bids on Bid Submission template to new CIL Expenditure email address <a href="mailto:CILexpenditure@baberghmidsuffolk.gov.uk">CILexpenditure@baberghmidsuffolk.gov.uk</a> including the following:</b></p> <ul style="list-style-type: none"> <li>▪ Description of infrastructure, location, purpose</li> <li>▪ Need /Justification</li> <li>▪ Costs and funding streams for provision</li> <li>▪ Quotations for works</li> <li>▪ How much financial support is sought from Babergh and Mid Suffolk District Councils and for what</li> <li>▪ Collaborative spend – yes/no and if yes give details</li> <li>▪ Who is leading on delivery</li> <li>▪ Delivery proposal and timescales</li> <li>▪ Will the Infrastructure be provided on Public or Private land – has the Bidder obtained all the necessary permissions to implement the infrastructure</li> <li>▪ If the infrastructure needs planning permission - has this been sought and obtained</li> <li>▪ has any State Aid already been received or offered from other government sources</li> <li>▪ Consideration of future funding/maintenance once project is complete</li> <li>▪ Business Plan required dependant on size of the project (see guidance documents)</li> </ul>	<p>These elements are the validation criteria for the CIL Bid process</p>

Validation Criteria for CIL Bids	Further detail where appropriate
<ul style="list-style-type: none"> <li>▪ When Bids are made valid consultation will occur with the District Ward Member the Division County Councillor for the Ward affected and the Parish Council for that ward (except where the Parish Council is the Bidder for the Infrastructure project). The Consultation will occur by email and 14 days will be allowed for the submission of comments. A copy of the CIL Bid application form and a location plan will be sent to the consultee. Infrastructure officers will carry out a site inspection and photographs will be taken.</li> </ul>	
<p>3. Any incomplete bids will be considered, and effort will be made to get the bid fully complete and capable of then being assessed against the screening and priority criteria.</p>	<p>These elements are the validation criteria for the CIL Bid process</p>

6.3 **Screening process** is set out in the following table (Table 8).

**Table 8 – Screening Criteria**

Screening Process for CIL Bids When Valid	Further detail where appropriate
<p>1. Must follow the Infrastructure Funding Statements for each Council where infrastructure to be provided.</p>	<p>These elements are the Screening criteria elements for the CIL Bid process</p>
<p>2. Consider whether this infrastructure bid could be provided using other internal and external funding streams that the Councils can either submit Bids for or support others or where the Council has access to other funding (e.g. LEP Government funding or other external funders s106, Community Grants. and Locality funding where appropriate – if so, can it be delivered using this without complete or any reliance on CIL funds).</p>	<p>These elements are the Screening criteria elements for the CIL Bid process</p>
<p>3. Where appropriate, information will be checked or sought to verify the information within the bid.</p>	<p>These elements are the Screening criteria elements for the CIL Bid process</p>
<p>4. Where there are CIL infrastructure “asks” under Development Management decisions on major projects, these will be given consideration in terms of devising the CIL</p>	<p>These elements are the Screening criteria elements for the CIL Bid process</p>

Expenditure Programme and through a programme of delivery working collaboratively with the Infrastructure Providers.	
--	--

6.4 **Prioritisation criteria** is as set out in the following table (Table 9).

**Table 9 - Prioritisation criteria**

<b>Prioritisation Criteria</b>	<b>Further detail where appropriate</b>
<b>1. Infrastructure necessary for an approved growth project (those with planning permission) in order that development carried out is sustainable</b>	This criteria is a requirement of the CIL Expenditure Framework
<b>2. Positively scores against provisions/objectives of Joint Corporate Plan and/or Joint Local Plan and/ or Infrastructure Strategies or other Babergh/Mid Suffolk Strategies or external strategies Babergh/Mid Suffolk support and/or input into</b>	This criteria is a requirement of the CIL Expenditure Framework
<b>3. It represents key infrastructure (critical/essential)</b>	This criteria is a requirement of the CIL Expenditure Framework
<b>4. Value for money (or Best Value.</b>	Guidance on Best Value is located at the rear of the document
<b>5. Clear community benefits</b>	This criteria is a requirement of the CIL Expenditure Framework
<b>6. Community support</b>	This criteria is a requirement of the CIL Expenditure Framework
<b>7. Deliverability (“oven ready” schemes)</b>	This criteria is a requirement of the CIL Expenditure Framework
<b>8. Affordability (from Strategic/Local infrastructure or Ringfenced Infrastructure Funds)</b>	Any infrastructure project must be affordable to gain favourable consideration
<b>9. Timeliness</b>	This criteria is a requirement of the CIL Expenditure Framework

Prioritisation Criteria	Further detail where appropriate
<b>10.By releasing CIL money can we achieve infrastructure provision through collaborative spend? (i.e. Infrastructure providers, Parish/Town Councils, Babergh/Mid Suffolk infrastructure provision, or LEP/Government funding)</b>	This criteria is a requirement of the CIL Expenditure Framework
<b>11.Supports housing and employment growth</b>	This criteria is a requirement of the CIL Expenditure Framework
<b>12.Have a package of measures been proposed and submitted which allow for ongoing maintenance of the infrastructure such that its longevity can be assured</b>	This criteria is a requirement of the CIL Expenditure Framework
<b>13.Must be based on the developing/adopted Infrastructure Delivery Plan/current Infrastructure Funding Statement unless circumstances dictate otherwise</b>	This criteria is a requirement of the CIL Expenditure Framework
<b>14.Does the provision of this infrastructure address a current inadequacy in infrastructure terms?</b>	This criteria is a requirement of the CIL Expenditure Framework
<b>15.By releasing funds, it would allow infrastructure to be realised such that the CIL funds are like the last piece of the jigsaw puzzle</b>	This criteria is a requirement of the CIL Expenditure Framework
<b>16.Will the infrastructure be capable of being used by the wider community.</b>	This criteria is a requirement of the CIL Expenditure Framework
<b>17.By provision of infrastructure it would unlock further opportunities within the District for housing and employment growth How does the proposal affect green infrastructure principles.</b>	This criteria is a requirement of the CIL Expenditure Framework
<b>18.How does the project address green/sustainability principles/infrastructure.</b>	This criteria is a requirement of the CIL Expenditure Framework
<b>19.How does the project affect state aid implications.</b>	This criteria is a requirement of the CIL Expenditure Framework
<b>20.How does the project affect security and safety in the community.</b>	This criteria is a requirement of the CIL Expenditure Framework

## 7. GOVERNANCE OF THE CIL EXPENDITURE FRAMEWORK

7.1 All decisions once validated screened and assessed and considered against the priority criteria will be collated and presented to Cabinet in the bi annual CIL Expenditure Programme for each District.

7.2 There will be tiered approach to decision taking in respect of bids submitted for Strategic Infrastructure Fund, Ringfenced Infrastructure Fund or Local Infrastructure Funds as follows: -

- **Delegated Decisions (to Director – Planning and Building Control)**
  - a) Decisions to approve infrastructure projects the subject of bids where the amount of monies sought from the Ringfenced Infrastructure Fund or the Local Infrastructure Fund is £10,000 or less
  - b) Decisions to refuse infrastructure projects the subject of bids where the amount of monies sought from the Ringfenced Infrastructure Fund or the Local Infrastructure Fund is £10,000 or less
  - c) Decisions to carry forward Infrastructure projects the subject of bids to the next Bid Round where the amount of monies sought from the Local Infrastructure Fund is £10,000 or less
  - d) Any decision which Officers consider may be of such significance or of a controversial nature such that Cabinet should take the decision in respect of the bid
- **Cabinet decisions**
  - a) Decisions to approve or refuse all Strategic Infrastructure Fund bids
  - b) All other decisions to approve or refuse all other Ringfenced and Local Infrastructure Fund bids which are not covered by the delegated decision taking outlined above under the delegated decisions listed above
  - c) Noting by Cabinet of all decisions on bids where delegated decisions are taken
  - d) All decisions on CIL Bids where CIL monies would be spent beyond the administrative and geographical boundaries of Babergh and Mid Suffolk.

---

### Guidance Foot note on Value for money or Best Value

**Best Value** was government policy in the United Kingdom affecting the provision of public services in England and Wales. In Wales, **Best Value** is known as the Wales Programme for Improvement. **Best Value** was introduced in England and Wales by the Local Government Act 1999, introduced by the UK Labour Government. Its provisions came into force in April 2000.

[Best value - Wikipedia, the free encyclopaedia](#)

en.wikipedia.org/wiki/Best value

## **BMSDC Procurement Manual**

Pages 50 and 51

### **2.12 Social Value**

2.12.1 The Councils have a duty to consider the creation of social value; which is to maximise the additional benefit that can be created by procuring the supplies, services and works above- and- beyond the benefit of merely the supplies and services themselves.

2.12.2 The delivery of Social Value aligns to the Councils' Joint Strategic Plan in the following areas: • Community Value – enabling communities to become more self -sufficient through the provision of self-help schemes, improvement of facilities, provision of education and employment opportunities.

- Regional Economic Development – subject to the test of fairness and equality for potential suppliers the opportunity to support the local economy.

- Environmental – using a solution which protects and /or enhances the environment.

### **2.16 Value for Money (Best Value)**

2.16 Value for Money (Best Value) 2.16.1 The Councils have a duty to ensure that best value is provided in the delivery of its services and this obligation shall be reflected across all the Councils' commissioning and procurement.

2.16.2 Achieving best value is about enabling the Strategic priorities of the Councils with the most effective use of financial resources and requires the consideration of quality factors in the evaluation of offers from suppliers as well as cost.

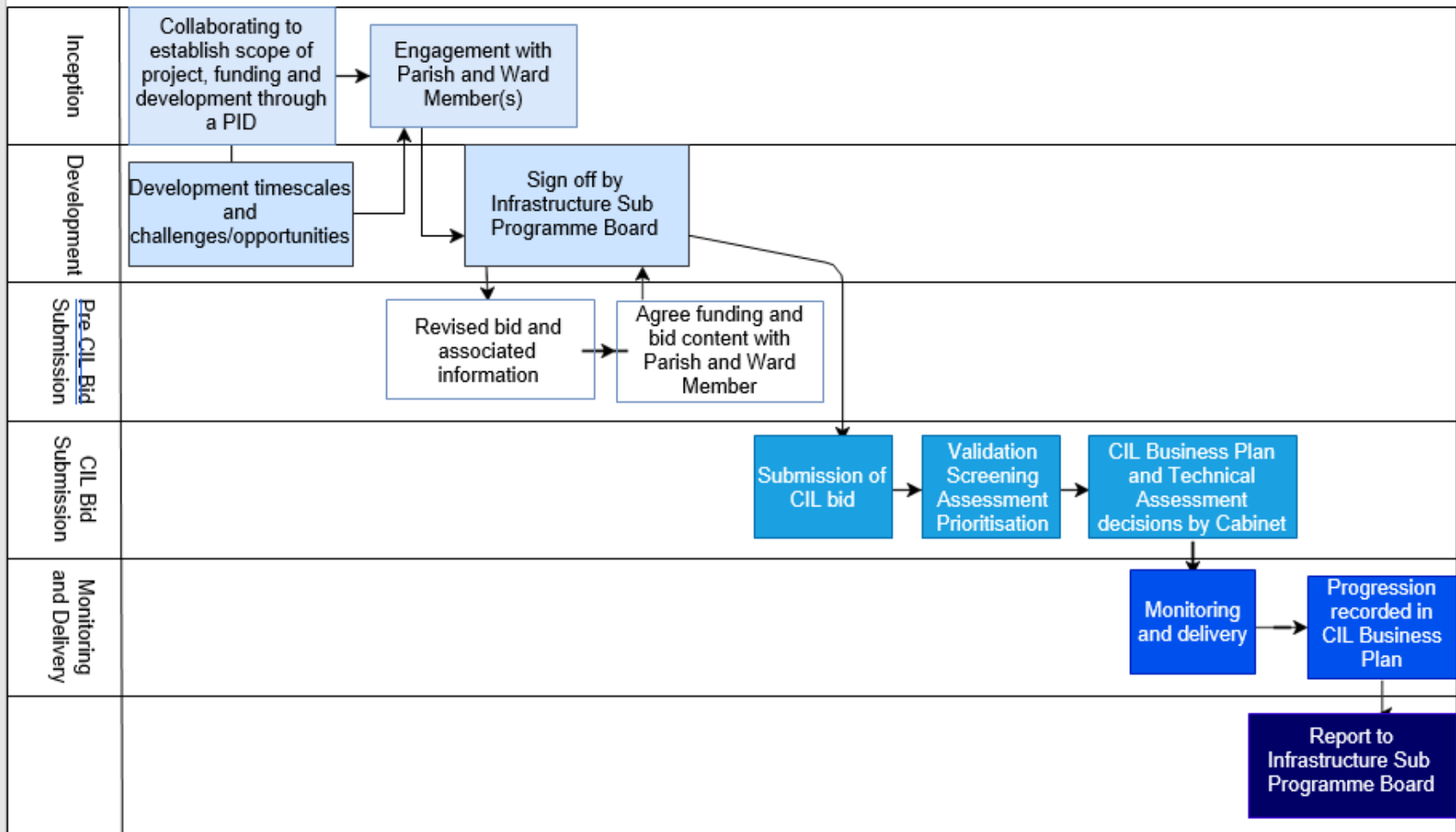
---

**Babergh and Mid Suffolk District Councils**  
**Endeavour House**  
**8 Russell Road**  
**IPSWICH**  
**IP1 2BX.**

## **THE CIL EXPENDITURE FRAMEWORK ENGAGEMENT PROCESSES**

The following documents are part of the CIL Expenditure Framework and constitutes the diagram of the new structured process around engagement with Parishes, Ward Members and County Councillors on Infrastructure project development incorporating Stages 1,2 and 3 documentation before CIL Bid submission.

## Delivery of Large/Medium Scale Infrastructure Projects





## Engagement Process

**Documentation** to support **the inception stage, the development stage and the pre submission stage** of the new structured process for the development of infrastructure projects prior to their submission as a CIL Bid (stage 4) as follows: -

### Infrastructure Delivery - Stage 1, 2 and 3 Documentation Template

<b>Task/Actions</b>	<b>Commentary</b>	<b>Lead Officer/Timescales</b>	<b>Activity/Outcomes</b>
<b>Project Initiation Document/ project Enquiry form for Community development - date completed</b>			
<b>Purpose</b>			
<b>Capacity of existing infrastructure and need for project</b>			
<b>Scale</b>			
<b>Shape</b>			
<b>Cost Multipliers</b>			
<b>Timescales and Delivery</b>			
<b>Local Issues through District Ward Member,</b>			
<b>Local Issues through Parish Council</b>			
<b>Local Issues through County Councillor</b>			
<b>Consider Joint Local Plan/IDP/NP/Other Council strategies</b>			
<b>Consider PIIPs</b>			
<b>Costs</b>			
<b>Funding opportunities What has been secured already What could be looked at to augment funding opportunities</b>			
<b>Other opportunities/ added value /additionality</b>			
<b>What other consultation is required/or is scheduled to take place together with timescales</b>			



## **APPENDIX A**

### **EXAMPLES OF DEFINITIONS OF STRATEGIC INFRASTRUCTURE PROJECTS, RINGFENCED INFRASTRUCTURE PROJECTS AND LOCAL INFRASTRUCTURE PROJECTS.**

#### **One or more of these elements constitute A PROJECT Strategic infrastructure:**

- is of strategic economic or social importance to the local Authority Areas or region in which it would be located.
  - would contribute substantially to the fulfilment of any of the objectives of the Joint Corporate Plan, Joint Local Plan, Infrastructure Delivery Plan (IDP) and each Councils Infrastructure Delivery Plan (IFS), The Joint BMSDC Economic 'Open for Business' Strategy, the Suffolk Framework for Growth, the Government's Industrial Strategy or Local Enterprise Partnership (LEP) New Economic Strategy for Norfolk and Suffolk objectives or in any regional spatial and economic strategy in respect of the area or areas in which the development would be located;
  - would have a significant effect on the area of more than one planning authority.
  - requires authorisation at Cabinet level.
  - will routinely be the subject of collaborative spend
- Illustrated Examples include strategic flood defence, hospitals and new rail infrastructure

#### **One or more of these elements constitute Ringfenced Infrastructure and Local infrastructure:**

- Infrastructure (under the Ringfenced Infrastructure Fund) constitutes infrastructure projects detailed within the Infrastructure Delivery Plan (IDP) and the Infrastructure Funding Statement (Infrastructure List) - (IFS) of each Council and which has been identified as being required to support the grant of planning permissions (for developments of 10 dwellings and above) in order to make the development sustainable in planning terms

#### **One or more of these elements constitute Local infrastructure:**

- Local Infrastructure constitutes infrastructure projects which are detailed on the CIL Position Statement and which are meeting need at a local level, can easily be identified as compliant with the CIL Position Statement infrastructure types and which support the expansion, improvement, provision of local services for the people living or visiting within the local area
- Illustrated examples include: extensions to early years, primary, secondary, or further education; bus stops and Real Time Passenger Information notice boards (RTPI); expansion of libraries or enhancement of the mobile library service; expansion to GP practices (where approved by NHS England); provision of leisure and community facilities, such as extensions to community buildings and leisure centres, provision of play equipment and areas, sports facilities and open space; and waste recycling facilities.

**March 2021**

## APPENDIX B – THE CIL BID ROUND CYCLE

The twice-yearly bid round cycle will be as follows:

<b>Bid Round 1 for the year</b>	
May	Open 1 <sup>st</sup> – 31 <sup>st</sup> May
June/July/August	Bids validated screened and assessed against prioritisation criteria
August	Information collated for production of CIL Expenditure Programme ready for presentation to Cabinet
September	Consideration of CIL Expenditure Programme by Cabinet. Letters issued confirming outcome of bids to applicants
<b>Bid Round 2 for the year</b>	
October	Open 1 <sup>st</sup> – 31 <sup>st</sup> October
November /December/January	Bids validated screened and assessed against prioritisation criteria
February	Information collated for production of CIL Expenditure Programme ready for presentation to Cabinet
March	Consideration of CIL Expenditure Programme by Cabinet. Letters issued confirming outcome of bids to applicants

March 2021

## **APPENDIX C – THE DEFINITION OF THE CAP RELATING TO NEIGHBOURHOOD CIL**

This cap is as follows: -

\* 25% of Neighbourhood CIL is paid where permissions are granted on or after the Neighbourhood Plan is made. 15% Neighbourhood CIL is paid where a Neighbourhood Plan is not made. There is a financial cap which relates to the total amount of the 15% Neighbourhood CIL receipts passed to a parish council. Any payment must not exceed an amount equal to £100 per council tax dwelling in that parish in each financial year. This financial cap does not apply in Parishes where a Neighbourhood Plan is made.

**March 2021**

---

## **March 2019 (Amended)**

# **FIRST COMMUNITY INFRASTRUCTURE LEVY (CIL) EXPENDITURE FRAMEWORK REVIEW (March 2019)**

## **Edition Amendments (March 2019) - Key Changes**

- The production of a yearly Key CIL Date calendar which will be published on the Councils web site each year.
- No CIL funding for infrastructure that has already been carried out (i.e. retrospectively).
- No payment towards costs which have already been paid and are sought for reimbursement as part of the CIL Bid (except where school extensions are planned as part of pupil placement creation which is a statutory function on the part of SCC).
- Improvement or replacement of existing infrastructure as part of a project must include additionality (some significant tangible betterment of the existing facility otherwise it would be termed to be maintenance or repair).
- No contingency costs will be eligible.
- CIL funds can be used for an infrastructure project to make it Disability Discrimination Act compliant.
- Three months of advance email notification before the Bid round opens to allow Bidders more Notice about Bid rounds opening in May and October each year.
- All interest accrued on CIL monies will be paid into the Strategic Infrastructure Fund pot.
- For all Community Infrastructure Bids three quotes to carry out the works will be required. These quotes must be offered to the Bidders and then submitted as part of the Bids on the basis that the cost of the works will remain held and not vary for a 6-month basis. (so as to be sure that when CIL monies are offered the project can be completed for the cost of the works submitted).
- Approach to CIL expenditure should be to secure funds alongside any CIL Bids from external (LEP Government funding and other sources) and internal funding sources (s106 Community grants and Locality funding where appropriate).
- Where Infrastructure Providers (such as Suffolk County Council -SCC) submit Bids for either education projects or bus passenger transport improvement proposals there will be no need to submit three quotes as Suffolk County Council as an Infrastructure provider has a contractual framework agreement in place which ensures that the project will achieve Best value and thereby meet Best value objectives. With regard to Bids for school extensions and education facilities (that are Regulation 123 list compliant), the Infrastructure provider must pay for feasibility studies and planning application costs prior to the CIL Bid being made. Once any such Education CIL Bids are submitted these costs can then be included in the overall cost of the project (so these costs are recovered by SCC as part of the agreed project).
- When Bids are made valid consultation will occur with the District Ward Member the Division County Councillor for the Ward affected and the Parish Council for that ward (except where the Parish Council is the Bidder for the Infrastructure project). The Consultation will occur by email and 21 days will be allowed for the submission of comments. A copy of the CIL Bid application form and a location plan will be sent to the consultee. Infrastructure officers will carry out a site inspection and photographs will be taken.
- Where infrastructure being proposed also carries a dual use (such as education provision to also be used by the community) the completion of a Community User Contract is required so that the community use can be guaranteed. (This will be a bespoke legal contract designed to suit the circumstances of the CIL Bid case).
- Determination of especially important Local Infrastructure Fund or Strategic Infrastructure Fund CIL Bids by Cabinet or using delegated powers (requiring approval or refusal or

noting by Cabinet) can be determined in advance of the biannual CIL Business Plan where appropriate.

- Infrastructure for Community use – a new CIL Project Enquiry form has been devised to allow early advice and support to be given to Parishes and Community groups where projects are identified (whether for CIL or other forms of funding).
- Further amplification contained in the document relating to the criteria for Value for money (or Best Value) - to address the internal Audit of September 2018.
- New CIL Bid application forms designed for community infrastructure projects both above and below the governance threshold of £10,000 to address different information requirements (for small/larger projects).
- The correct CIL Bid form must be submitted. All the questions on the Bid application form must be fully completed (where information known or where additional information is required e.g. Business Case).
- Business Plan required dependant on size of the project (see guidance documents).
- New CIL Bid application forms for Passenger Transport and Improvement (shorter than before also recognizing and adapting the Framework such that three quotes are not required as there is a contractual framework agreement in place for delivery - which meets best value objectives).
- New CIL Bid forms for Education facilities proposals

## **March 2019**

---

### **April 2020 (Amended)**

## **SECOND COMMUNITY INFRASTRUCTURE LEVY (CIL) EXPENDITURE FRAMEWORK REVIEW (APRIL 2020)**

### **Edition Amendments (April 2020) - Key Changes**

- Abolition of the Regulation 123 Lists on the 1st September 2019 and the adoption of the CIL Position Statements for both Councils outlining what each Council will spend its CIL money on.
- Renaming of the CIL Business Plan to the CIL Expenditure Programme.
- Twenty five new key principles are inserted into Table 1 covering a wide range of subject matter including a new structured approach to resolving CIL Bids applications at pre submission of a CIL Bid including reporting to an Infrastructure Sub Programme Board at stages 1 and 2 and a stage 3 sign off stage (see diagram at the end of this document).
- Revised monitoring documents will be needed as part of the CIL Regulations 2019 where the need to produce an Infrastructure Funding Statement (IFS) is required for both Councils.
- New clarification inserted about permanent equipment which are eligible for CIL funds.
- Speaking at Cabinet - now altered in the Framework to reflect the Councils Constitution.
- Consultation period changed from 21 days to 14 days.
- Twenty-four new measures are inserted into Table 6 covering a wide array of process changes including new guidance, new rail forms, new limitations on expenditure on infrastructure submitted by the community together with recreations infrastructure projects.
- Four new prioritisation criteria added to Table.
- Deletion of one unused category which is not required from the original document as the remainder of the provisions adequately provide sound governance for CIL Bid determination.

- Addition of a Diagram to detail the new structured process around engagement for the development of infrastructure projects prior to their submission as a CIL Bid.
- Addition of documentation to support the inception stage, the development stage and the pre CIL submission stages of the new structured process for the development of infrastructure projects prior to the submission as a CIL Bid (stage 4).

## April 2020

---

## March 2021 (Amended)

### THIRD COMMUNITY INFRASTRUCTURE LEVY (CIL) EXPENDITURE FRAMEWORK REVIEW (MARCH 2021)

#### Edition Amendments (March 2021) - Key Changes

- Abolition of the CIL Position Statements for both Councils and their replacement with the Infrastructure Funding Statement (IFS) for each Council. The IFS contains data on CIL and s106 income and expenditure together with details of the allocation and expenditure of Neighbourhood CIL. In addition, the IFS for each Council contains an Infrastructure List of infrastructure projects which CIL will be spent on. The IFS for each Council is different and will be updated each year. The IFS gives a list of specific infrastructure projects that CIL will be spent on and therefore its production for each Council each year is critical to the expenditure of CIL and should be read in conjunction with the CIL Expenditure Framework.
- New CIL Bid application form for requests for CIL funds from adjoining Local Authorities/Infrastructure Providers for CIL to support infrastructure projects outside the Babergh and Mid Suffolk administrative boundaries where it can be satisfactorily proven that our growth impacts on infrastructure beyond the District's boundaries such that mitigation is required.
- New additional criteria for dealing with such CIL Bids (from adjoining Local Authorities/Infrastructure Providers) as follows: -
  - Must be collaborative Bids – Babergh/Mid Suffolk will not contribute 100%.
  - Babergh's and Mid Suffolk's CIL spend must be proportionate to what is being provided and linked by way of evidence to impacts of growth within Babergh and Mid Suffolk and must address evidence-based impacts.
  - Must be specific deliverable projects with timescales and oven ready schemes with all necessary formal approvals in place.
  - Babergh and Mid Suffolk must be final part of the funding jig saw so that CIL funds are not tied up in projects that will not be delivered.
  - Must be capital based specific projects that address growth impacts.
  - Will not fund projects which are not classed as infrastructure.
  - Specific infrastructure projects must be listed in the Infrastructure Delivery Plan and within the Infrastructure Funding Statement (Infrastructure List) for Babergh and Mid Suffolk where spend is going to occur.
- Same engagement process for Parish Councils Ward Members and County Councillors (as already set out in the Framework) where CIL expenditure beyond each Districts administrative/geographical boundaries is over £50,000.
- All such CIL expenditure beyond each Districts administrative/geographical boundaries shall be Cabinet decisions with no delegated decisions.
- Technical Assessment shall include an additional section where CIL spend outside the administrative/geographical boundaries of the Districts to respond to these additional criteria.
- Collaborative spend outside the District shall be limited to Infrastructure provider projects only.



- Normal Bid round process twice a year will apply.
- Submission of a CIL Project Enquiry form before actual CIL Bid submission will be necessary and can be submitted year-round.
- Consider whether the required mitigation can be provided by other means (through culminative growth impacts).
- Is the infrastructure mitigation required classed as essential within the other Districts Infrastructure Delivery Plan, Infrastructure Funding Statement and Statements of Common Ground.
- All CIL Bids for expenditure beyond the Districts administrative/geographical boundaries must come from adjoining Local Authorities or Infrastructure Providers. Any requests from Parishes Community Groups/other organisations (such as Health Hubs, Schools) outside BDC and MSDC administrative boundaries will be regarded as falling outside the terms of our CIL Expenditure Framework – not eligible for making CIL Bids.
- CIL Bid requests direct from schools – agreed we make position clear in the CIL Expenditure Framework that all education funding must be because of a proven education need and other Bids will be outside the CIL Expenditure Framework.
- Use of CIL Project Enquiry Form – regarded as very useful for building a programme of infrastructure delivery. Agreed all infrastructure projects must submit a CIL Project Enquiry Form before actual CIL Bid submission.
- One transitional Bid round – where circumstances warrant one transitional Bid round for all existing undetermined CIL Bids so that they are not disadvantaged by any changes in this review.
- Agreement to keep CIL Expenditure Framework under review. Agreed another review (fourth) whilst Bid round 8 is underway (October 2021) so that any revisions are adopted before Bid round 9 occurs in May 2022.
- Agreed the Joint Member Panel remain to inform the fourth CIL Expenditure Framework review.

## **March 2021**

---

## **July 2022 (Amended)**

### **FOURTH COMMUNITY INFRASTRUCTURE LEVY (CIL) EXPENDITURE FRAMEWORK REVIEW (JULY 2022)**

#### **Edition Amendments (July 2022) - Key Changes**

- Parish/Heating system – Suggestion that a community building element (e.g. Village Hall) would be eligible for District CIL funding (even if part of a wider parish scheme) with an agreed increased community threshold limit of £100,000 together with any District CIL funding not exceeding more than 75% of the total project costs.
- Clarity around charging admittance by the organisation for the infrastructure funded by CIL (museums/art galleries) - Continue to support Infrastructure for museums/art galleries but limited to suggested increased community threshold levels (of £100,000 and not more than 75% of the total cost of the project). Organisation must have a charitable status and have a 25-year lease and/or the land is public land capable of access by the public.
- Clarity around charging admittance by the organisation for the infrastructure funded by CIL (public open space) - For such CIL Bids to be considered as acceptable in principle the land must be in public ownership or leased for 25 years as public open space and the

users of the public open space or play equipment should not be required to pay for admittance and the facility must be capable of use by all.

- Catchment areas for proposed infrastructure (e.g., schools, rail, health hubs) – Use of Ringfenced monies. Where infrastructure delivery is proposed through the submission of CIL Bids, the financing of these Bids when recommended to Cabinet or through delegated decisions will be undertaken by using Ringfenced monies first, supplemented by use of Strategic or Local Infrastructure Funds secondly if necessary (if additional funds required). Catchment areas will continue to be used for education, health hubs and agreed need to collect evidence pointing towards a catchment area for rail. No change to current arrangement for Infrastructure by the Community – use Ringfenced funds for that Parish, and where insufficient or no funds exist use Local Infrastructure fund.
- Agreed increase to £100,000 threshold and 75% of total costs of the project for Infrastructure Bids submitted by the Community
- Changes to the CIL project enquiry form
- Improvements to the Website by the inclusion of a district wide map for both Districts to show where District CIL has been spent and a photographic reel of infrastructure projects showing before and after pictures and information of completed infrastructure projects where District CIL has been used.
- Funding for Cycling and footpaths – projects in the LCWIP, IDP and IFS – suggested that a pilot period/scheme be operated with new community threshold of £100,000. Suggested the undertaking of proactive work for bringing LCWIP schemes forward. Position on the pilot scheme /period to be reviewed at next (fifth) CIL Expenditure Framework review to measure progress methodology and outcomes for deliverability of schemes.
- Highway, traffic calming and highway/traffic equipment – these matters lie outside the CIL Expenditure Framework and Parishes that have Neighbourhood CIL could consider using this for these projects.
- For infrastructure led by the community, the current six month held period for quotes for infrastructure led by the community be reduced to four months and updated quotes are sought, if necessary, before decisions made on CIL Bids.
- Encourage greater spending of CIL (including Neighbourhood CIL). Continue with current proactive approaches towards expenditure and progression of CIL Bids and in addition, produce capital project workplans (for next five years) with other infrastructure providers (Health, SCC Waste etc). In addition, number of CIL briefings per year to increase from two to three for both Members and also Parishes (with Members in attendance at Parish events, if desired). Review alongside the IFS where Neighbourhood CIL spend is occurring and if necessary, carry out focused discussion with the Parish about capital CIL projects that are underway. Better targeted website advice with specific guidance note to aid project development as well as PIIPs (Parish Investment Infrastructure Plans) development. Look at the “chipping in” of Neighbourhood CIL – on a case-by-case basis and keep this matter under review for the next (fifth) review of CIL Expenditure Framework.
- Eligibility for green infrastructure (Infrastructure which reduces the carbon footprint) – currently EV charging points are supported for 100% of project costs. However now suggested that it should be up to 100% and that other items should be included such as District CIL funding for upgrades or additionality for community buildings (but not for repair or maintenance); for example, heating systems, toilet handwashing systems, better roof/wall insulation and roof lights and ventilation (which could replace use or need for air conditioning).

- Agreement to keep CIL Expenditure Framework under review. Agreed another review (fifth) whilst Bid round 10 is underway (October 2022) so that any revisions are adopted before Bid round 11 occurs in May 2023.
- Agreed the Joint Member Panel remain to inform the fifth CIL Expenditure Framework review.
- Change of job title from Assistant Director of Planning and Communities to Assistant Director of Planning and Building Control (paragraph 5.2)

## July 2022

---

### March 2023 (Amended)

## FIFTH COMMUNITY INFRASTRUCTURE LEVY (CIL) EXPENDITURE FRAMEWORK REVIEW (March 2023)

### Edition Amendments (March 2023) - Key Changes

- Should CIL be used for testing boreholes at the feasibility part of a District/Parish Heating system – should they be eligible? – Explanation given that borehole drilling is to establish the geological “make-up” of the ground and to determine what type of heating installation work best in the area. Members of the Joint Member Panel considered that other funding would be possible for this and whilst it should be kept under review. Both Councils agreed District CIL funds are not to be used for feasibility studies for testing boreholes for such schemes at this stage (Noted in Table 4 paragraph 14 refers)
- Clarity around use of District CIL for community led infrastructure projects involving business proposals/ventures – this use of District CIL monies for business purposes is unacceptable and is outside the terms of the CIL Expenditure Framework. Both Councils agreed that it would be inappropriate for a private business to benefit from District CIL investment (Noted in Table 4 paragraph 15 refers )
- Delivery of Library improvements/extensions – these can be supported through CIL Bids for District CIL where there is proven evidenced need for improvement /expansion. Such proposals for funding would be treated in the same way both Councils treat education proposals (wrapping up design costs in the final funding application). New CIL Bid forms required for library improvement/expansion proposals (Noted in Table 6 paragraph 30 refers). New libraries funding would need to be sought through s106 funding. (Noted in Table 6 paragraph 30 and Table 6 paragraph 49 refers)
- Use of Claw Back (for the return of District CIL funding) where risks indicate that it would be both appropriate and reasonable. Members agreed that a claw back provision was sensible when the risks or circumstances dictated that its use was appropriate (acknowledging that these cases were likely to be few and far between and the period of the claw back would be determined on a case by case basis) - (Table 6 paragraph 50 refers).
- Review of use of District CIL for Highway works, Traffic Calming and highway/traffic equipment – Members agreed that highway traffic calming measures, pedestrian crossings, village gateway measures and speed reduction measures and traffic equipment are considered as part of the planning process when granting planning permission for development. These are the Highways responsibility and therefore fall outside of the CIL Expenditure Framework for funding purposes. **The only exception to this is where**

**funding is being considered for Active travel and LCWIP cycling and walking infrastructure project where it might be necessary to include a highway measure (e.g. like a pedestrian crossing) as part of the project in order to secure the required overall walking and cycling scheme (over and above any other highway measures that might be delivered by developments through s106 or under s278 of the Highways Act).** (Table 4 paragraph 13 refers)

- Continuing review of the current £75,000 threshold and 75% of total eligible costs of the project for Infrastructure Bids submitted by the Community – agreed retention of thresholds of £100,000 and 75% of total eligible costs of the project to address rising infrastructure and materials costs.(Noted in Table 1 paragraph 24 refers)
- Continued funding for Cycling and footpaths – projects in the LCWIP, IDP and IFS – continuation of the pilot period/scheme be operated with community threshold of £100,000. Suggested the undertaking of proactive work for bringing LCWIP schemes forward. Position on the pilot scheme /period to be reviewed at next (sixth) CIL Expenditure Framework review to measure progress methodology and outcomes for deliverability of schemes.(Noted on Table 5 paragraph 5 refers)
- Rising costs of building works and difficulty of getting committed prices for CIL Bids (for infrastructure led by the community). Both Councils agreed that the current 4 month held period for quotes for infrastructure led by the community be reduced to 1-2 months and updated quotes are sought, if necessary, before decisions made on CIL Bids (Noted in Table 6 paragraph 24 refers).
- CIL monies collected need to be spent. Encourage greater spending of CIL (including Neighbourhood CIL). Both Councils agreed to continue with current proactive approaches towards expenditure and progression of CIL Bids and in addition, produce capital project workplans (for next 5 years) with other infrastructure providers (Health, SCC Waste etc). In addition, number of CIL briefings per year to be retained at three for both Members and also Parishes (with Members in attendance at Parish events, if desired). Review alongside the IFS where Neighbourhood CIL spend is occurring and if necessary, carry out focused discussion with the Parish about capital CIL projects that are underway. Better targeted website advice with specific guidance note to aid project development as well as PIIPs (Parish Investment Infrastructure Plans) development. Look at the “chipping in” of Neighbourhood CIL – on a case-by-case basis and keep this matter under review for the next (sixth) review of CIL Expenditure Framework.(Noted in Table 6 paragraph 48 refers)
- Consultation on CIL Bids - Consultation will occur with the District Ward Member the Division County Councillor for the Ward affected and the Parish Council for that ward (except where the Parish Council is the Bidder for the Infrastructure project). The Consultation will occur by email and 14 days will be allowed for the submission of comments. (Should extensions of time be sought they will be granted).A copy of the CIL Bid application form and a location plan will be sent to the consultee. **CIL Bids no longer need to be valid for Consultation to occur** - (Noted in Table 6 paragraph 25 refers)List of changes to the CIL Expenditure Framework following review (Noted in Table 6 paragraph 40 refers)
- Agreement to keep CIL Expenditure Framework under review. Agreed another review (sixth) whilst Bid round 12 is underway (October 2023) so that any revisions are adopted before Bid round 13 occurs in May 2024 (Table 6 paragraph 43 refers).
- Agreed the Joint Member Panel remain to inform the sixth CIL Expenditure Framework review. (Table 6 paragraph 43 refers)

- Change of job title from Assistant Director of Planning and Building Control to Director of Planning and Building Control (paragraph 7.2 refers)

## March 2023

---

## March 2024 (Amended)

# SIXTH COMMUNITY INFRASTRUCTURE LEVY (CIL) EXPENDITURE FRAMEWORK REVIEW (March 2024)

## Edition Amendments (March 2024) - Key Changes agreed by both Councils

- Clarity around funding investment through District CIL for new pavilions and extensions to Sports clubs, Tennis and Cricket clubs who charge admittance fees for usage. The Joint Member Panel agreed that the use of District CIL would be appropriate for Sports clubs Tennis and Cricket Clubs subject to the prevailing community threshold limitations of £100,000 (maximum) and not more than 75% of total eligible project costs of the project. The Joint Member Panel also requested that a Community User Agreement be signed by the Sports/Tennis/Cricket Club which should be secured before any CIL Bid is determined. This should be based on a statement in the CIL Bid application form on the community usage benefits that would accrue from any such CIL Bid. Joint Member Panel Members also agreed that it would not be appropriate to use District CIL for Golf facilities as these are normally run as businesses for profit and it would be inappropriate for a private business to benefit from District CIL investment.
- Clarity around use of District CIL for community led infrastructure projects involving community shops and cafes run by a properly constituted organisation for non for profit. The Joint Member Panel agreed it would be appropriate for District CIL to be used for extension/alteration or improvement (for environmental purposes) of publicly owned buildings (Parish Council or Village \Hall Management organisations) or such buildings which are the subject of a lease for no shorter period than 25 years subject to the following additional limitations/caveats :-
  - All the criteria and the prevailing community threshold limitations of £100,000 (maximum) and not more than 75% of total eligible project costs of the project
  - the submission of a business case (for the non for profit project) for a three year period (going forward)containing details of;-
    - how the organisation proposing the CIL Bid is properly constituted for non for profit,
    - how the non for profit community shop or café will operate including all expected expenditure for staff /management,
    - how much investment there will be on a yearly basis going forward for repairs and maintenance of the building (to be improved)
    - Where the non for profit asset elements of the community shop or café operation will be invested and what they will be used for such that the community receives maximum benefit from the operation
    - Submission of financial accounts for all the previous years if the use is already in existence

- In respect of such a non for profit community shop or café project, Joint Member Panel Members also considered the following caveats were appropriate given that it would be inappropriate for a private business to benefit from District CIL investment :-
  - Any successful CIL Bid offer letter for such a CIL Bid will specify there would be no business (for profit) element within the floorspace affected by the CIL Bid.
  - There would also be no sublets for any other business purposes going forward
- Clarity around use of District CIL for community pubs – as community pubs are not classed as infrastructure and given the risks around these operations, the Joint Member Panel recommend that District CIL should not be used for such projects and that any such proposals would be termed to fall outside the terms of the CIL Expenditure Framework and not be considered eligible for funding.
- With all car park proposals/projects, the Joint Member Panel recommend that the CIL bid forms be altered to allow for statements to be made (at the time of the CIL Bid) about the use of EV charging points and cycle provision (cycle parking/racks)
- Review of continued District CIL funding for Churches where capital projects are proposed. The Joint Member Panel recommend that Churches can continue to apply for District CIL if there is strong evidence of community involvement through a statement of community involvement which would need to be submitted and assessed with the CIL Bid. Such cases would be considered on a case-by-case basis and in accordance with all other provisions of the CIL Expenditure Framework (including being subject to community led infrastructure project financial thresholds - -£100K maximum and not more than 75% of the total eligible project costs). Repairs and maintenance would continue to be classed as not eligible for District CIL expenditure.
- Review of Approved and Implemented CIL Bid Projects – The Joint Member Panel recommend that Infrastructure Officers carry out a review of completed CIL Bid projects which would also ensure they are being satisfactorily used in accordance with any Community User Agreement which is in place. The Joint Member Panel recommended trailing this review process for a one year period (to determine its effectiveness and to gain feedback for the next CIL Expenditure Framework) as follows;-
  - Recommend review comprises a questionnaire and a follow up meeting with the CIL Bidder a year after the completion of the project.
  - Where any problems are identified (such as any projects community benefits having not yet been realised), the Joint Member Panel recommend Infrastructure Officers work with the CIL Bidder, the Ward Member and the Town/Parish Council so that any problems can be resolved in a positive and constructive way (rather than in any financially punitive way).
- Delivery of Library improvements/extensions – continuation of current District CIL funding position such that these can be supported through CIL Bids where there is proven evidenced need for improvement /expansion. Such proposals for funding would be treated in the same way both Councils treat education proposals (wrapping up design costs in the final funding application). Library projects must continue to be linked to business case based on housing growth and all CIL Bids and their funding strategies to be agreed prior to submission through the emerging CIL Bid process. Design costs will not be claimed by

SCC if there is ultimately no intention by SCC to deliver that library project. However, in all cases projects for a new Library provision would need to be sought through s106 funding (rather than District CIL).

- CIL Bid Offers and Claims for payment (mainly Community Led development). Following some experiences of changes made to projects before financial claims are made, the Joint Member Panel recommend that:-
  - Infrastructure Officers amend practices and procedures and strengthen communication with CIL Bidders.
  - Infrastructure Officers review the CIL Bid Offer letter (including list of eligible and non-eligible costs).
  - Infrastructure Officers Improve the formal briefings to Members and Parishes to highlight and address identified issues.
- Clarity around use of District CIL for District Council infrastructure projects - The Joint Member Panel recommend the following:-
  - Continue with the current agreed position on District CIL usage for District Council infrastructure projects (i.e. that projects can be funded 100%).
  - Review the Councils Capital programme so that capital projects where District CIL could be used for infrastructure are identified such that District CIL becomes part of the funding strategy for those projects
- Clarity around the use of District CIL for early years settings – Given the likely impact of new reforms (the increase to 30 hours of free childcare for children aged 9 months to 4 years old, the Joint Member Panel recommend the following in respect of District CIL expenditure:-
  - S106 contributions will need to be sought for new buildings
  - District CIL can support extensions of existing schools where early years settings are part of the school
  - District CIL cannot be used for business purposes so is not expected to be used to support privately run ventures
  - In view of the three funding caveats above, this situation which is evolving should be kept under regular (yearly) review as there could be significant implications for the use of District CIL and the Infrastructure Delivery Plan (IDP).
- Continuing review of the current £75,000 threshold and 75% of total eligible costs of the project for Infrastructure Bids submitted by the Community – agreed retention of current thresholds of maximum £100,000 and not more than 75% of total eligible project costs.
- Continued funding for Walking/Cycling and footpaths – projects in the LCWIP, ISPA, Infrastructure Delivery Plan (IDP) and Infrastructure Funding Statements(IFS) – Continuation of the pilot period/scheme with 100% District CIL funding for another one year period. Continuation of the current proactive work for bringing LCWIP schemes forward. Position on this pilot scheme /period to be reviewed again at next review (seventh) CIL Expenditure Framework. This review would measure progress, methodology and outcomes for deliverability of schemes and consider options for District CIL funding going forward.
- CIL monies collected need to be spent. Encourage greater spending of CIL (including Neighbourhood CIL). Continue with current proactive approaches towards expenditure and progression of CIL Bids as follows-, produce capital project workplans (for next 5

years) with other infrastructure providers (Health, SCC Waste etc). Continue with review alongside the IFS where Neighbourhood CIL spend is occurring and if necessary, carry out focused discussion with the Parish about capital CIL projects that are underway. Better targeted website advice with specific guidance note to aid project development as well as PIIPs (Parish Investment Infrastructure Plans) development. Look at the “chipping in” of Neighbourhood CIL – on a case-by-case basis and keep this matter under review for the next (seventh) review of CIL Expenditure Framework.

- Agreement to keep CIL Expenditure Framework under review. Suggested that another CIL Expenditure Framework review (seventh) should occur whilst Bid round 14 is underway (October 2024) so that any revisions are adopted before Bid round 15 occurs in May 2025.
- Agreed the Joint Member Panel remain to inform the next seventh CIL Expenditure Framework and Communication Strategy review.

**March 2024**

---



# The Community Infrastructure Levy Expenditure Framework **Communications Strategy**

## Babergh and Mid Suffolk District Councils

Appendix B - March 2024

# **The Babergh and Mid Suffolk Community Infrastructure Levy (CIL) Expenditure Framework Communications Strategy**

## **1.0 Background**

- 1.1 Following the decision by Babergh and Mid Suffolk Councils to implement Community Infrastructure Levy, both Councils have been charging for CIL liable development since 11<sup>th</sup> April 2016. A scheme for CIL expenditure has been devised and reviewed each year and sits alongside this Communications Strategy. Both the CIL Expenditure Framework and the CIL Expenditure Framework Communication Strategy scheme were approved by both Councils in April 2018 and amended through the first review and adopted by both Councils in March 2019. Since then, a cross party cross Council Joint Member Panel has reviewed both documents each year (2020-2024) leading to this current version)

### **CIL collection**

- 1.2 CIL is collected and allocated in accordance with the CIL Regulations 2010 (as amended). Each Council retains 5% of the total CIL income for administration of CIL. From the remainder, 15% is allocated to Parish or Town Councils (subject to a financial cap) but where there is a Neighbourhood Plan in place this figure rises to 25%(with no financial cap).
- 1.3 Each year both Councils are required as CIL charging authorities to publish monitoring statistics for collection, allocation and expenditure of CIL monies by the 31<sup>st</sup> of December for each year (on the website for both Councils). The CIL Regulations 2019 introduced a requirement for both Councils to produce an Infrastructure Funding Statement (IFS) containing both section 106 and CIL expenditure and allocation and expenditure of neighbourhood CIL together with a list of infrastructure projects for both Councils (known as the Infrastructure List). The first one for each Council was considered by each Council's Cabinet in November 2020 and published on the web site for both Councils in December 2020. Under the CIL Regulations of 2019 it is a requirement to produce a yearly review of each Councils Infrastructure Funding Statement; these are published each year for both Councils on the Councils web site.

### **CIL Expenditure**

- 1.4 The development of a detailed framework for CIL expenditure for consideration and adoption by both Councils has been devised as there is no set approach for CIL expenditure prescribed either by Central Government or through the CIL Regulations.
- 1.5 As such all Councils across the country, where a CIL charging regime has been adopted and is being implemented, have established their own schemes for how CIL monies are spent.
- 1.6 The CIL Regulations stipulate that CIL monies which are collected must be spent on infrastructure. Each Council has published a list of infrastructure projects known as the "Infrastructure List" within each Councils Infrastructure Funding Statement.(IFS) These lists are infrastructure projects that are largely but not

wholly derived from the Infrastructure Delivery Plan. However, it is intended that they will all be partially/wholly funded through CIL or s106 or other funding means. The Infrastructure List taken from each Councils Infrastructure Funding Statement are not identical for both Councils.

- 1.7 The CIL Expenditure Framework which sits alongside this Communications Strategy is critical to the funding of infrastructure to support inclusive growth and sustainable development.
- 1.8 The CIL Expenditure Framework for both Babergh and Mid Suffolk was adopted in April 2018. The scheme was launched on the 27<sup>th</sup> April 2018 and the first Bid round commenced in May in 2018 (for the whole calendar month). The second Bid round took place in October 2018 (also for the whole calendar month). Thereafter the scheme operates on a twice-yearly Bid round; the Bid rounds will continue to be held during the calendar months of May and October each year. As this expenditure for the provision of infrastructure affects both Districts communities, it is considered necessary to have a Communications Strategy to sit alongside the CIL Expenditure Framework.
- 1.9 The CIL expenditure process will involve Bids being submitted for CIL monies (from Infrastructure Providers including Officers of Babergh and Mid Suffolk where appropriate) and Parish/Town Councils (including Community Groups) on a twice-yearly basis.
- 1.10 Whilst some Bids will be determined on a delegated basis (and be subsequently noted by each Council's Cabinet), some Bids will be determined by the Cabinet of the Council where the Bid either falls geographically.
- 1.11 Some of the information (including financial information) around the Bids when submitted may be commercially sensitive. However, it is intended that basic information concerning the infrastructure to be provided by the Bid will be capable of being placed on the Council's website together with outcomes both when the Bids are determined and when the infrastructure project has been completed. This information will be placed in both Councils CIL Expenditure Programme including details of emerging infrastructure projects (issued and updated at least twice yearly).
- 1.12 The key messages of this Communications Strategy reflect this position and strike a balance between openness and transparency and the need to safeguard any commercial sensitivity that may apply.

## 2.0 **Aims of the Strategy**

### 2.1 These are: -

- To identify the key messages and ensure these remain consistent throughout all communications which this Strategy covers.
- Establish the key stakeholders and determine the communication channels and tools needed to convey the key message.

- Set out the framework for communication in terms of where and when and how to deliver key messages.
- Identify opportunities for proactive communication and address circumstances when communication is necessary to address any CIL collection and expenditure issues.
- Identify any potential risks and put in place communication counter measures to mitigate against these.

### 3.0 Key Messages and the Framework for Communication

#### General

- 3.1 These will relate to CIL expenditure (including CIL collection – see Background above). They will involve the process and any specific cases where Bids are made together with the outcome following decision taking.
- 3.2 Key messages will also include details of the completion of any infrastructure projects which are the outcome of successful Bids (for Strategic Infrastructure Fund, Ringfenced Infrastructure Fund or Local Infrastructure Fund expenditure. These infrastructure projects are likely to include different funding streams including CIL and are referred to in the CIL Expenditure Framework as collaborative spend. (see CIL Expenditure Framework)
- 3.3 There will be regular briefings each year in the following way for the following key organisations and people: -
  - Continuation of three briefings each year to be given to Members and Parishes on CIL collection/processes of CIL expenditure/project development/use of Exacom – to improve knowledge and facilitate expenditure of District and Neighbourhood CIL. This will allow Members to attend with their Parish/Town Council if desired. It was agreed in the sixth review of the Strategy by both Councils that any training of Exacom with Parishes will be held on a “cluster of parishes” basis so that maximum reach to parishes can be enabled as effectively as possible.
  - The Joint Member Panel recommend that one Member training session be held in the forthcoming year as a joint briefing session with officers of SCC and Infrastructure Officers so that the roles and responsibilities for SCC for pupil placement and the role of Academies together with the changes coming forward to Early Years settings can be more fully understood by Members. (SCC Officers have agreed to this suggestion.)

- Inclusion of Parish Investment Infrastructure Plans – (PIIPs) and People and Place Plans (PPPs) into the subject matter for Member and Parish briefings each year
- Babergh and Mid Suffolk Officers will hold regular meetings with appropriate infrastructure providers as needed throughout the year to ensure that infrastructure is planned for and provided as part of a developing a programme of infrastructure delivery linked to growth (funded either through s106 or CIL or other funding mechanisms).

### **Regular Communication - Frequency and type**

- 3.4 As stated in paragraph 1.3 above, before the 1<sup>st</sup> September 2019 the CIL Regulations required CIL charging authorities to publish monitoring statistics for collection, allocation and expenditure of CIL monies by the 31<sup>st</sup> of December for each year – these have been published for both Councils on the website). From the 1<sup>st</sup> September 2019 the CIL Regulations introduced a new requirement for the production of an Infrastructure Funding Statement (IFS) for both Councils including s106 and CIL income and expenditure. In addition, the IFS for both Councils also includes the allocation and expenditure of Neighbourhood CIL for each Council together with a list of Infrastructure projects for each Council that is largely but not wholly informed by the Councils Infrastructure Delivery Plan.
- 3.5 Details of and payment of Neighbourhood CIL monies from both Councils CIL income to both Councils Parish Councils /Town Councils (see paragraph 1.2 above) will be undertaken twice yearly (by the 28<sup>th</sup> of April and by the 28<sup>th</sup> October each year). For those Parishes where there is no Parish or Town Council in place both Councils retain the monies and spend it through consultation with the Parish affected. All Parishes (via the Clerks) and all Ward and District Members will be advised twice yearly of the allocation of these monies via email with the relevant CIL allocation reports published on the Web site (each April and October). All Babergh and Mid Suffolk staff will be notified either by email or through an internal newsletter.
- 3.6 Details of the Councils' CIL Expenditure Framework, (including details of the yearly cycle of Bid submission and consideration) supporting Guidance Documents, Bid Application forms and prioritisation criteria (which will be applied to Bid determination) will be available on the Councils' web site. A Key CIL date calendar will also be produced each year to facilitate Bid submission. Clear information of the process including a flow chart will also be provided on the Councils' web site.
- 3.7 For a period of three months before the Bid Rounds open, advance monthly email communications will be sent to all Infrastructure Providers (including relevant officers of Babergh and Mid Suffolk) and all Parish and Town Councils who are also infrastructure providers to advise of the Bid

process being open for the submission of Bids twice yearly. This will also be communicated through the Councils web site.

- 3.8 Following validation of submitted Bids, the Ward Member(s), Division County Councilor for that Ward, and the Parish Council (via the Clerk) shall be advised of the receipt of the validated Bid via email and be given 14 days to comment upon the submitted Bid. This will include the application form and a location plan in order to assist with the submission of a response. An officer site inspection will take place in respect of all CIL Bids (where photographs will be taken)
- 3.9 A list of all validated Bids received will be placed on each Councils web site at the time that local consultation takes place containing basic information only to safeguard any commercial sensitivity.
- 3.10 For the duration of the Bid when it is validated, during consultation and whilst being assessed until decision taking, there will be no comment on individual Bids or comments made following consultation except for required communication with affected Infrastructure Providers, the District and County Councilor for the Ward and the Parish or Community Group or the author of the Bid. (This will allow resources to be directed towards consideration of and determination of the Bids). No proactive press statements will be made during this time.
- 3.11 After the decisions have been made on the Bids whether delegated or by Cabinet all authors of the Bids, all Parishes, all Members and County Division Councilors affected by the Bids will be advised by email of the decision of the Bids (whether approved or not and/or whether held in abeyance and carried forward to the next Bid round for a particular reason).
- 3.12 All authors of successful Bids will receive an offer letter (for a 2-year period) and an acceptance form which would need to be signed and returned and which would make the terms of the Bid decision clear. The web site will be duly updated with the decisions on the Bid and appropriate press/media coverage will be undertaken involving joined up communication for all organisations where collaborative spend is involved. **When all press releases are devised – paragraphs 7.2 and 7.3 will be taken into account and the Communication will reflect the inclusion of District Ward Members and relevant Parish Councils and other key organisations (or funding bodies) particularly in the case of the latter where collaborative spend is involved.**
- 3.13 At least twice yearly, a CIL Expenditure Programme will be presented to each Council's Cabinets and determined within 6 months of the Bid round being opened. The CIL Expenditure Programme will contain details of CIL collection, details of all Bids approved or otherwise, any Bids carried forward for particular reasons, any allocated spend whether collaborative or not with details of delivery (of the infrastructure project) and timescales and any details of delegated decision or Cabinet decisions for

infrastructure. It will include updates on any decisions already taken by Cabinet concerning delivery of infrastructure. In addition, it will also include basic information on emerging infrastructure projects (CIL Bids). Our key audience will be advised of decisions by email and each CIL Expenditure Programme will be made available on the Councils web site.

- 3.14 A yearly CIL Calendar will be issued outlining all the key dates in that year affecting CIL and this will also be publicised on the web site both in word and outlook format.

#### **4.0 Key Audience**

4.1 These are: -

- Infrastructure Providers (including Officers of Babergh and Mid Suffolk)
- All District Members
- County Council Members (of the Ward affected by any Bids)
- All Parish Councils
- Community Groups where Bids are made
- Local Residents in both Districts
- Leaders and Cabinet Members of both Babergh and Mid Suffolk
- Chief Executive
- All Staff (including all Strategic Directors, Assistant Directors, Corporate Managers and Professional Leads)
- Media

#### **5.0 Communication Channels**

5.1 These are: -

- District Councils websites
- Emails to our Key Audience
- Town and Parish Council Meetings

- Leader and Cabinet Member briefings
- District Council Member Briefings
- Parish and Town Council briefings and workshops
- Media releases
- Social media (Facebook, Twitter)
- Town and Parish Council newsletter
- Working Together, Connect.

## **6.0 Communication Tools**

- 6.1 Many of our audience already receive a number of communications from us across a range of subjects and projects. To help ensure our communication on CIL is easily recognisable and read, it will be necessary to clearly identify the purpose of the communication at the top of the key message.
- 6.2 Templates for emails, and updates will also be developed to ensure clarity of message. Our website will identify through a flow chart about how the process will work and when Bid submission and decision taking will occur.
- 6.3 Social media will also be a key channel for communicating with our audiences and to help ensure these messages are recognised is intended to use the CIL expenditure and CIL collection hashtag for each Twitter and Facebook update where appropriate.

## **7.0 Spokespeople**

- 7.1 For CIL collection information will be communicated through the Councils website and this will be regularly updated subject to the other requirements in this document.

**For Strategic Infrastructure Fund Expenditure** – which has considerable impact on each District suggest the following: -

- Cabinet Member for Planning BDC
- Cabinet Member for Planning MSDC

**For Ringfenced Infrastructure Fund Expenditure** – which has considerable/significant impact on each District suggest the following: -



- Cabinet Member for Planning BDC
- Cabinet Member for Planning MSDC

**For Local Infrastructure Fund Expenditure** which has significant impact on the District suggest the following: -

- Cabinet Member for Planning BDC
- Cabinet Member for Planning MSDC

**7.2 With the exception of press announcements of the decisions on the CIL Bids after determination of the CIL Expenditure Programme by both Councils Cabinet, every decision on submitted Bids or where Infrastructure projects are delivered the District Ward Member for the Community where the Infrastructure is to be provided must be included in the Key message. In respect of press announcements of the decisions on the CIL Bids after determination of the CIL Expenditure Programme by both Councils Cabinet, the lead messages will be from the Cabinet Members for Planning of both Council. However, when such CIL Bids are determined, Ward Members affected will also be given the opportunity to offer a quote to support the press announcement.**

**7.3 Where proactive or reactive key messages are delivered these must be managed so that where the Bids involve collaborative spend the different organisations working in collaboration including Parishes must be part of the key message and the key message is effective and joined up (including the District Ward Member)**

**7.4 Every opportunity will be taken wherever possible to undertake joint communication messages with Infrastructure Providers and other funding bodies and partners including those carrying out the infrastructure project together with Parish/Town Councils. Members must always remain involved.**

## **8.0 Risks**

**8.1** The successful delivery of Infrastructure projects across both District Councils are important for a number of reasons. Not only are these projects aligned with a range of our key strategic priorities but the infrastructure that is provided will mitigate any harm from new development and make that development sustainable. In addition, some infrastructure projects may address current infrastructure inadequacy or deliver a Parish or community infrastructure initiative. As such they will be the focus of a great deal of interest from our key audience and may generate media interest and engagement on a wider level.

**8.2** All this audience is invested in the outcome of these projects for a variety of reasons. (financial, social and economic). This will bring these projects under

very close scrutiny and we need to acknowledge that failure to effectively communicate with our audience could have a significant impact on its success and the reputation of both Councils.

- 8.3 It is also important to recognise that communication needs to be accurate and clear and both Councils will take appropriate measures to correct any factual inaccuracies should they occur.

**Babergh and Mid Suffolk District Councils**  
**Endeavour House**  
**8 Russell Road**  
**IPSWICH**  
**IP1 2BX**

---

**Edition Amendments (March 2019) – First Review - The CIL Expenditure Framework Communication Strategy**  
**Key changes**

- Delete yearly event for all Infrastructure providers to regular meetings with Infrastructure providers as needed to devise a programme of capital expenditure for Infrastructure with each provider
- Publication of a yearly Key CIL date calendar
- Addition of three early email communications instead of Email communications (to reflect the recommendation of Overview and Scrutiny on the 19<sup>th</sup> November 2018)
- Consultation - the addition of an application form and a location plan in order to assist with a response.
- An officer site inspection will take place in respect of all CIL Bids when valid (where photographs will be taken)”
- Retain quotes in press statements for every Ward Member about successful projects except for the reporting of Business plan decisions (twice yearly) where quotes from the Cabinet Member for Planning is to be used instead with other Ward Members affected being given the opportunity to submit a quote.

---

**Edition Amendments - April 2020 – Second Review - The CIL Expenditure Framework Communication Strategy**  
**Key changes**

- Introduction of changed monitoring arrangements of s106 and CIL but the production of an Infrastructure Funding Statement (including an Infrastructure List) by both Councils in the CIL Regulations 2019
- Reference to the CIL Position Statements and their impending replacement by the Infrastructure Funding Statement (including an Infrastructure List)
- Deletion of requirement for a general press communication for Bid submission – this is done via email
- Change of consultation time period from 21 days to 14 days
- Every opportunity will be taken to undertake joint communication messages with infrastructure providers and other funding bodies and organisation including Parishes. Ward Member must remain involved

---

## **Edition Amendments – March 2021 – Third Review - The CIL Expenditure Framework Communication Strategy**

### **Key changes**

- Abolition of the CIL Position Statements and their replacement by the Infrastructure Funding Statement (including an Infrastructure List) for each Council
- Inclusion of the Infrastructure Funding Statement on CIL Expenditure for Member Briefings.
- Alteration of wording to reflect that Parish Briefings will take place in a virtual setting (with the deletion of references to those Briefings being held in different locations within both Districts)
- Inclusion of specific dates for the allocation of Neighbourhood CIL in April and October each year.

---

## **Edition Amendments –July 2022 (Mid Suffolk) and October 2022 (Babergh) Fourth Review - The CIL Expenditure Framework Communication Strategy**

### **Key changes**

- Change from twice yearly briefings for Members to three briefings each year on CIL collection and the detail/processes of CIL expenditure.
- Change from twice yearly briefings to three briefings each year on CIL collection and the detail/processes of CIL expenditure for all Parish and Town Councils within both Districts (by holding Parish Briefings /Liaison meetings for both districts). Members will be invited to these sessions so as to allow the opportunity for Members to attend with their parishes.

---

## **Edition Amendments – March 2023 – Fifth Review - The CIL Expenditure Framework Communication Strategy**

### **Key changes**

- **Consultation on CIL Bids** - Consultation will occur with the District Ward Member the Division County Councillor for the Ward affected and the Parish Council for that ward (except where the Parish Council is the Bidder for the Infrastructure project). The Consultation will occur by email and 14 days will be allowed for the submission of comments. (Should extensions of time be sought they will be granted). A copy of the CIL Bid application form and a location plan will be sent to the consultee. **CIL Bids no longer need to be valid for Consultation to occur.**
- **Three briefings each year to be continued on CIL collection and the detail/processes of CIL expenditure for District Members** – to improve knowledge and facilitate expenditure of District and Neighbourhood CIL.

---

## **Edition Amendments – March 2024 – Sixth Review - The CIL Expenditure Framework Communication Strategy**

### **Key changes**

- Continuation of three briefings each year to be given to Members and Parishes on CIL collection/processes of CIL expenditure/project development/use of Exacom – to improve knowledge and facilitate expenditure of District and Neighbourhood CIL. This will allow Members to attend with their Parish/Town Council if desired. The Joint Member Panel suggested that any training of Exacom with Parishes be held on a “cluster of parishes” basis so that maximum reach to parishes can be enabled as effectively as possible.

- The Joint Member Panel recommend that one Member training session be held in the forthcoming year as a joint briefing session with officers of SCC and Infrastructure Officers so that the roles and responsibilities for SCC for pupil placement and the role of Academies together with the changes coming forward to Early Years settings can be more fully understood by Members. (SCC Officers have agreed to this suggestion.)
  - Inclusion of Parish Investment Infrastructure Plans – (PIIPs) and People and Place Plans (PPPs) into the subject matter for Member and Parish briefings each year
-

### Appendix C – CIL Expenditure 2024/25 Calendar Key Dates (in Bold)

<b>January 2024</b>	<b>Assessment of CIL Bids in Bid round 12 – October 2023</b>
5 <sup>th</sup> February 2024	Email alert to announce Bid round 13 - May 2024 – see Communications Strategy
<b>February 2024</b>	<b>CIL Expenditure Framework Review 6 closes</b>
4 <sup>th</sup> March 2024	Email alert for Bid round 13 - May 2024 – see Communications Strategy
<b>March 2024</b>	<b>Babergh CIL Expenditure Programme to Cabinet (Bid round 11 – October 2023)</b>
<b>March 2024</b>	<b>Mid Suffolk CIL Expenditure Programme to Cabinet (Bid round 11 – October 2023)</b>
<b>March 2024</b>	<b>CIL Expenditure Review 6 presented to Babergh and Mid Suffolk Council meetings for adoption</b>
1 <sup>st</sup> April 2024	Email alert for Bid round 13 - May 2024 – see Communications Strategy
<b>28<sup>th</sup> April 2024</b>	<b>Neighbourhood CIL Payments made to Parish/Town Councils by this date</b>
<b>1<sup>st</sup> May 2024</b>	<b>CIL Expenditure Bid Round 13 opens</b>
<b>31<sup>st</sup> May 2024</b>	<b>Bid Expenditure Bid Round 13 closes</b>
<b>June 2024</b>	<b>Validation of CIL Bids received in Bid round 13 (together with all outstanding undetermined CIL Bids)</b>
1 <sup>st</sup> July 2024	Email alert for Bid round 14 - October 2024 – see Communications Strategy
<b>July/August 2024</b>	<b>Publication of valid Bids on Web site and consultation of Valid Bids for 2-week period. Screening of all outstanding valid CIL Bids (including those received in Bid round 13 – May 2024)</b>
<b>July/August 2024</b>	<b>Assessment of all valid undetermined CIL Bids (including those received during Bid round 13 – May 2024)</b>
5 <sup>th</sup> August 2024	Email alert for Bid round 14 – October 2024 – see Communication Strategy
<b>August 2024</b>	<b>Delegated decisions for all outstanding CIL Bids (including those received in Bid round 13 – May 2024)</b>
2 <sup>nd</sup> September 2024	Email alert for Bid round 14 - October 2024 – see Communications Strategy
<b>September 2024</b>	<b>Babergh CIL Expenditure Programme to Cabinet (Bid round 13 – May 2024)</b>
<b>September 2024</b>	<b>Mid Suffolk CIL Expenditure Programme to Cabinet (Bid round 13 – May 2024)</b>
<b>September/October /November 2024</b>	<b>Preparation /production of Babergh Infrastructure Funding Statement (IFS) for collection and expenditure of s106 and CIL monies and allocation and expenditure of Neighbourhood CIL, together with publication of the Infrastructure List (with date for publication on the web site)</b>

<b>September/October /November 2024</b>	<b>Preparation /production of Mid Suffolk Infrastructure Funding Statement (IFS) for collection and expenditure of s106 and CIL Monies and allocation and expenditure of Neighbourhood CIL, together with publication of the Infrastructure List (with date for publication on the web site)</b>
<b>1<sup>st</sup> October 2024</b>	<b>CIL Expenditure Bid Round 14 opens</b>
<b>28<sup>th</sup> October 2024</b>	<b>Neighbourhood CIL Payments made to Parish/Town Councils by this date</b>
<b>31<sup>st</sup> October 2024</b>	<b>CIL Expenditure Bid Round 14 closes</b>
<b>November/December 2024</b>	<b>CIL Expenditure Framework Review 7 preparation commences including consideration by Joint Member Panel</b>
<b>November 2024</b>	<b>Validation of undetermined CIL Bids (including those received in Bid round 14 – October 2024)</b>
<b>December 2024</b>	<b>Publication of valid Bids on Web site and consultation of Valid Bids for 2-week period. Screening of all valid undetermined CIL Bids (including those received in Bid round 14 – October 2024)</b>
<b>Within 2024</b>	<b>Member Briefing - 3 events per year – precise dates to be advised</b>
<b>Within 2024</b>	<b>Parish Briefing/ Liaison – 3 events per year - precise dates to be advised</b>
<b>December 2024 /January 2025</b>	<b>Assessment of CIL Bids in Bid round 14 – October 2024</b>
<b>3<sup>rd</sup> February 2025</b>	<b>Email alert to announce Bid round 15 - May 2025 – see Communications Strategy</b>
<b>February 2025</b>	<b>CIL Expenditure Framework Review 7 closes</b>
<b>3<sup>rd</sup> March 2025</b>	<b>Email alert for Bid round 15 - May 2025 – see Communications Strategy</b>
<b>March 2025</b>	<b>Babergh CIL Expenditure Programme to Cabinet (Bid round 14 – October 2024)</b>
<b>March 2025</b>	<b>Mid Suffolk CIL Expenditure Programme to Cabinet (Bid round 14 – October 2024)</b>
<b>March/April 2025</b>	<b>CIL Expenditure Review 7 presented to Babergh and Mid Suffolk Council meetings for adoption</b>
<b>7<sup>th</sup> April 2025</b>	<b>Email alert for Bid round 15 - May 2025 – see Communications Strategy</b>
<b>Within 2025</b>	<b>Member Briefings - 3 events per year – precise dates to be advised</b>
<b>Within 2025</b>	<b>Parish Briefing/ Liaison – 3 events per year - precise dates to be advised</b>

## Appendix D - Equality Impact Assessment (EIA) Initial Screening Form



Screening determines whether the policy has any relevance for equality, ie is there any impact on one or more of the 9 protected characteristics as defined by the Equality Act 2010. These are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership\*
- Pregnancy and maternity
- Race
- Religion or belief (including lack of belief)
- Sex
- Sexual orientation

<p><b>1. Policy/service/function title</b></p>	<p>Strategic Planning Policy – Infrastructure – Community Infrastructure Levy (CIL) - CIL Expenditure Review – March 2024 One joint report and four separate Appendices for Babergh and four separate Appendices for Mid Suffolk.</p>
<p><b>2. Lead officer (responsible for the policy/service/function)</b></p>	<p>Christine Thurlow – Professional Lead – Key Sites and Infrastructure</p>
<p><b>3. Is this a new or existing policy/service/function?</b></p>	<p>New - in terms of Review  Existing: Existing (see 5 below)</p>
<p><b>4. What exactly is proposed? (Describe the policy/service/ function and the changes that are being planned?)</b></p>	<p>The Community Infrastructure Levy (CIL) - CIL Expenditure Framework– April 2018 was presented to both Councils Cabinets in March 2018 and at Council for both Councils in April 2018.It was reviewed and amended and the changes were adopted by both Councils in March 2019. A second third and fourth review of all the documents took place and was adopted respectively by both Councils in April 2020, March 2021 and July 2022 (Mid Suffolk) and October 2022 (Babergh) The fifth review occurred over the winter of 2022/23 and the changes were adopted by both Councils in March 2023.</p> <p>All the reports recommended approval of changes to the CIL Expenditure Framework, the CIL Expenditure Framework Communication Strategy and the timeline for the launch and the CIL Key dates Calendar, All documents were adopted by both Councils.</p>

	<p>However, it was also agreed that there would be a sixth review of these documents. This assessment considers the impact of this sixth review</p>
<p><b>5. Why? (Give reasons why these changes are being introduced)</b></p>	<p>Community Infrastructure Levy (CIL) monies have been collected since the implementation of CIL in April 2016. There is no prescribed way for Councils to decide upon the spending of money collected through CIL, so the Council has to agree their own approach.</p> <p>The adopted CIL Expenditure Framework, CIL Expenditure Communications Strategy and Timeline for its implementation and review were all agreed at Councils of both District Councils in April 2018 and amended through the first review in March 2019 and further amended through the second review in April 2020. A further review took place and the changes were adopted in March 2021. A fourth review took place in May and these changes were adopted by Mid Suffolk in July 2022 and by Babergh in October 2022. A further review (fifth) took place and the changes were adopted in March 2021</p> <p>.</p> <p>This report presents some amendments to the scheme designed by the Joint Member Panel who have also called for a further seventh review whilst Bid round 14 is in operation (October 2024) so that any changes can be in place before Bid round 15 (May 2025) commences.</p> <p>It is important that the scheme is kept under review to ensure that expenditure of the CIL is prioritised correctly particularly with the Infrastructure Delivery Plan and separate Infrastructure Funding Statement for both Councils. These documents sit alongside the emergent Joint Local Plan which will allocate sites for development up to 2037.</p> <p>In this way the development that is carried out is sustainable as the harm from the development is mitigated by the infrastructure provision.</p> <p>All the Bids submitted for CIL funding are different and relate to different Parishes, different types of infrastructure and as both Councils are sovereign Councils, monies are collected recorded and spent separately.</p>



	<p>There are two Bid Rounds each year and each Bid has been validated screened for other forms of funding and then prioritised according to the agreed criteria. Each CIL Bid dependant on whether the spend is above or below £10,000 will be determined by Cabinet (above £10,000) or made under delegated powers (under £10,000) where the decisions will be presented to Cabinet for Cabinet to note.</p> <p>At least two CIL Expenditure Programmes are produced each year for each Councils Cabinets to consider so that delivery of infrastructure can be responsive to demand, and focus can be maintained on outcomes related to delivery of infrastructure supporting growth.</p>
<p><b>6.</b> How will it be implemented? (Describe the decision-making process, timescales, process for implementation)</p>	<p>The processes and procedure including governance arrangements for CIL expenditure are set out in the CIL Expenditure Framework and the CIL Expenditure Communications Strategy with timescales set out in the associated CIL Key Dates document.</p> <p>The amendments proposed under cover of this report all address all three documents. The processes are described in 5 above</p>
<p><b>7.</b> Is there potential for differential impact (negative or positive) on any of the protected characteristics?</p>	<p>Yes</p> <p>No Infrastructure provision is necessary to mitigate the harm from the impact of growth so that the development that is carried out is sustainable.</p> <p>Communities in general benefit from infrastructure provision and delivery and its provision generally causes positive impacts for that community that all can benefit from. It does not impact on a specific equality strand unless it has been particularly designed to do so.</p>
<p><b>8.</b> Is there the possibility of <b>discriminating unlawfully</b>, directly or indirectly, against people from any protected characteristic?</p>	<p>Yes</p> <p>No No</p>
<p><b>9.</b> Could there be an effect on <b>relations between certain groups</b>?</p>	<p>Yes</p> <p>No No</p>

<b>10. Does the policy explicitly involve, or focus on a particular equalities group, i.e., because they have particular needs?</b>	Yes  No <b>No</b>
---	-------------------------

If the answers are 'no' to questions 7-10 then there is no need to proceed to a full impact assessment and this form should then be signed off as appropriate.

If 'yes' then a full impact assessment must be completed.

Authors signature Christine Thurlow

Date of completion 29<sup>th</sup> January 2024

Any queries concerning the completion of this form should be addressed to the Equality and Diversity Lead.

\* Public sector duty does not apply to marriage and civil partnership.

# Agenda Item 11

## BABERGH & MID SUFFOLK DISTRICT COUNCILS

<b>TO:</b>	<b>BDC COUNCIL MSDC COUNCIL</b>	<b>REPORT NUMBER: MC/23/46</b>
<b>FROM:</b>	<b>Councillor Jessie Carter, Cabinet Member for Housing Councillor Richard Winch, Cabinet Member for Housing &amp; Property</b>	<b>DATE OF MEETINGS:</b>  <b>BDC - 19 March 2024 MSDC - 20 March 2024</b>
<b>OFFICER:</b>	<b>Amma Antwi-Yeboah, Corporate Manager – Housing Solutions</b>	<b>KEY DECISION REF: N/A</b>

### JOINT HOMELESSNESS REDUCTION AND ROUGH SLEEPING STRATEGY 2024

#### 1. PURPOSE OF REPORT

- 1.1 To adopt the draft Homelessness Reduction and Rough Sleeping Strategy 2024 and the associated Delivery Plan.

#### 2. OPTIONS CONSIDERED

- 2.1 The Council must publish a review of homelessness every five years and a strategy to meet the requirements of the Homelessness Act 2002. The draft Homelessness Reduction and Rough Sleeping Strategy 2024 also considers the requirements of the Homelessness Reduction Act 2017.

#### 3. RECOMMENDATIONS

- 3.1 To adopt the contents of this report and the Draft Homelessness Reduction and Rough Sleeping Strategy 2024, attached as Appendix A and associated Delivery Plan, attached as Appendix B, provide scrutiny and, where appropriate provide comment.
- 3.2 To adopt the vision and priorities of the draft Homelessness Reduction and Rough Sleeping Strategy, ensuring the Delivery Plan is reflective of the current challenges facing the districts.

#### REASON FOR DECISION

To ensure Babergh and Mid Suffolk District Councils meets its legal duty to publish a Joint Homelessness Reduction and Rough Sleeping Strategy.

To ensure that Babergh and Mid Suffolk District Councils meets its statutory obligations under the Homelessness Act 2002 to review homelessness within its District and publish the results of that review and a strategy for tackling homelessness and rough sleeping over the next five years.

## **4. KEY INFORMATION**

- 4.1 A review has been conducted of the previous Homelessness Reduction and Rough Sleeping Strategy 2019-2024. It highlights some of the key achievements in the service over that period.
- 4.2 The key achievements in Babergh and Mid Suffolk District Councils from the 1<sup>st</sup> April 2019 to 31<sup>st</sup> March 2023 include preventing homelessness in over 579 cases in BDC and 553 cases in MSDC, relieving homelessness in over 264 cases in BDC and 247 cases in MSDC. We have also successfully embedded our Rough Sleeping and Domestic Abuse services.
- 4.3 The Homelessness Reduction and Rough Sleeping Strategy's vision for 2024-2029 is that 'Homelessness and rough sleeping is prevented wherever possible and, where it cannot be prevented, it is rare, brief and non-recurring' and to ensure that the service takes a person-centred and holistic approach to housing options.
- 4.4 The cost-of-living crisis has seen an increase in demand for our Housing Solutions Service. Given the current economic conditions, which is impacting on society as a whole, many private landlords are leaving the sector causing an increase in the number of households approaching for assistance when landlords sell their properties.
- 4.5 From 1<sup>st</sup> April 2022 – 31<sup>st</sup> March 2023, the team took 627 Homeless Applications in BDC and 588 in MSDC, compared to 2021/22 when there were 581 applications in BDC and 510 in MSDC.
- 4.6 From 1st April 2022 – 31st March 2023, the team prevented homelessness in 144 cases in BDC 153 cases in MSDC and relieved homelessness (helped someone to secure accommodation who was already homeless) in 44 cases in BDC and 56 cases in MSDC. This is a significant achievement, particularly when comparing 'like for like' figures from 2021/22, and reflects the time and effort invested by the team.
- 4.7 In 2021/22,53 households in BDC and 33 households in MSDC were accepted as being homeless and being owed a main housing duty. In 2022/23, there were 60 households in BDC and 54 households in MSDC 54 accepted as being homeless and being owed a main housing duty. This is an increase, which is another indication of the reduction in the supply of homes in the private rented sector and the impact of the cost of living.
- 4.8 We want to aspire to be a homelessness service that goes beyond the minimum required by the legislative framework and the Code of Guidance. We provide a bespoke homelessness service which is person-centred and is focused on proactive, early upstream intervention, working with residents before they are in crisis.
- 4.9 The Housing Solutions Services is ambitious in its aims for the next five years and this strategy sets out some of the key areas we need to be focussing on to further improve the lives of residents within our Districts.

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

- 5.1 Make best use of existing housing assets

## 6. FINANCIAL IMPLICATIONS

- 6.1 There are no financial implications to the final production and launching of the Homelessness and Rough Sleeping Strategy other than nominal costs which will be within existing budget provision. Naturally there will be financial implications of the pledges and actions within the strategy and each will be considered individually as part of each business case or project document.

## 7. LEGAL IMPLICATIONS

- 7.1 Section 1(4) of the Homelessness Act 2002 requires housing authorities to publish a new homelessness strategy, based on the results of a further homelessness review, within the period of 5 years beginning with the day on which their last homelessness strategy was published. However, housing authorities can conduct homelessness reviews and publish homelessness strategies more frequently if circumstances in the district change. The Department for Levelling Up, Housing and Communities monitors which Councils have published a strategy and will contact us if we fail to publish a such a strategy during 2024.

## 8. RISK MANAGEMENT

- 8.1 Key risks are set out below:

Risk Description	Likelihood	Impact	Mitigation Measures
Without a revised and adopted Homelessness Reduction and Rough Sleeping Strategy, it is unlikely the Councils will reduce homelessness and higher numbers of Babergh and Mid Suffolk residents may be at increased risk. This will impact most on our vulnerable residents and children.	Highly unlikely (1)	Minimal (1)	Dedicated officer resources support the production and inclusion of a reviewed Homelessness Reduction & Rough Sleeping Strategy in accordance with duties and guidance of the Homelessness Reduction Act 2017, as part of the comprehensive Housing Strategy development process. (Housing Solutions Risk Register Number 47).

## 9. CONSULTATIONS

- 9.1 April 2023: Survey of key stakeholder to determine areas of strategic focus and begin work on action plans.
- 9.2 August 2023: Babergh and Mid Suffolk Housing Portfolio Holders briefed.
- 9.3 November 2023: Babergh and Mid Suffolk Joint Overview and Scrutiny Committee commented on the process and endorsed the approach and scrutinized the Vision, Priorities and Delivery Plan.

- 9.5 December 2023/ January 2024: All Member briefing sessions
- 9.6 December 2023: 6-week open consultation period from 4<sup>th</sup> December 2023 to 14<sup>th</sup> January 2024 The consultation was conducted via a variety of communication channels and formats to ensure groups were not knowingly excluded.
- 9.7 February 2024: Babergh and Mid Suffolk Councillors briefed on consultation feedback and final amendments to the strategy and associated delivery plan.
- 9.8 March 2024: Strategy and delivery plan to Full Councils to request adoption.

**10. EQUALITY ANALYSIS**

- 10.1 Some of the protected grounds may be affected as a result of the recommendations in this report, so a full Equality Impact Assessment (EIA) has been carried out and is attached at Appendix (C). The EQIA has been approved by the officer with responsibility for Equality.

**11. ENVIRONMENTAL IMPLICATIONS**

- 11.1 There are no environmental implications as a result of the Homelessness Reduction and Rough Sleeping Strategy.

**12. APPENDICES**

Title	Location
(a) Draft Homelessness Reduction and Rough Sleeping Strategy	Attached
(b) Draft Homelessness Reduction and Rough Sleeping Delivery Plan	Attached
(c) BMSDC Homelessness Review 2023	Attached
(d) Equality Impact Assessment	Attached
(e) Consultation Outcomes	Attached



# Homelessness

## Reduction and Rough Sleeping Strategy



dream

April 2024



# Contents

<b>Introduction</b>	<b>3</b>
<b>Our Vision</b>	<b>4</b>
<b>The Legal Context</b>	<b>5</b>
<b>The National Context</b>	<b>6</b>
<b>The Local Context</b>	<b>7</b>
<b>Priority 1 - Early upstream prevention &amp; intervention</b>	<b>9</b>
<b>Priority 2 - Making rough sleeping rare, brief and non-recurring</b>	<b>14</b>
<b>Priority 3 - Ensuring the health and wellbeing needs of households are met whilst in temporary accommodation</b>	<b>19</b>
<b>Priority 4 - Expanding and future proofing the role and remit of Central Suffolk Lettings to continue to improve access to the private rented sector</b>	<b>26</b>
<b>Priority 5 - Mitigating against the impacts of the cost-of-living</b>	<b>31</b>





# Introduction

Under the Homelessness Act 2002 all Housing Authorities are required to carry out a review of homelessness in their Districts and formulate a homelessness strategy based on the results of that review.

The current Homelessness Reduction and Rough Sleeping Strategy 2019 - 2024 has been reviewed and the findings of that review have fed into the development of this new Strategy. (The Babergh and Mid Suffolk Homelessness Review 2023 can be found at Appendix A).

For many people the term 'homelessness' evokes images of the 'rough sleeper', however, homelessness and the services provided by the Local Authority are far more complex and widespread than this. This can include people living in insecure, unsuitable or unaffordable housing as well as those required to leave their existing housing, often through no fault of their own.

This strategy seeks to destigmatize homelessness and empower residents to seek help and act on advice at the earliest opportunity.

It also seeks to ensure that all our policies and procedures have 'early and upstream' intervention at their heart to maximise opportunities to prevent households becoming homeless in the first place.

This Homelessness Reduction and Rough Sleeping Strategy will ensure we have a clear focus on how we can work with our partners to effectively prevent and relieve homelessness. It will also provide a plan on how to ensure that access to accommodation, support and advice is available for residents of the districts who are at risk of becoming homeless or may already be homeless.



# Our Vision

Our vision is that homelessness and rough sleeping is prevented wherever possible and, where it cannot be prevented, it is rare, brief and non-recurring.

To achieve this, we will:

## FOCUS

on embedding an early prevention and intervention approach with support systems to achieve this.

## WORK

with those who have lived experience through co-production; to influence services, options, process and policies.

## DEVELOP

a county wide, multi-agency approach to support people to rebuild their lives in settled and sustainable tenancies.

## Our priorities are:

- Early upstream prevention & intervention.
- Making rough sleeping rare, brief and non-recurring.
- Ensuring the health and wellbeing needs of households are met whilst in temporary accommodation.
- Expanding and future-proofing the role and remit of Central Suffolk Lettings to continue to improve access to the private rented sector.
- Mitigating against the impacts of the cost of living.



# The legal Context

There is a raft of legislation that shapes and defines how homelessness and rough sleeping are dealt with in the UK. We must work within this legal framework to meet our statutory obligations to those who are homeless or at risk of becoming homeless:

## **Housing Act 1996 (Part 7):**

The Housing Act 1996 came into effect 20 January 1997. Part 7 of the Housing Act 1996 is the overarching piece of legislation that relates to homelessness. The Act has been amended by the Homelessness Act 2002, the Localism Act 2011 and more recently by the Homelessness Reduction Act 2017.

## **Homelessness Act 2002 & Homelessness (Priority Need for Accommodation) (England) Order 2002:**

The Homelessness Act 2002 introduced amendments to Part 7 of the Housing Act 1996 and introduced powers for a Local Authority to end the main housing duty, owed to applicants where a homeless duty had been accepted, by arrangement of a suitable offer of accommodation through the private rented sector.

## **Homelessness Reduction Act 2017:**

The Homelessness Reduction Act 2017 amended the period

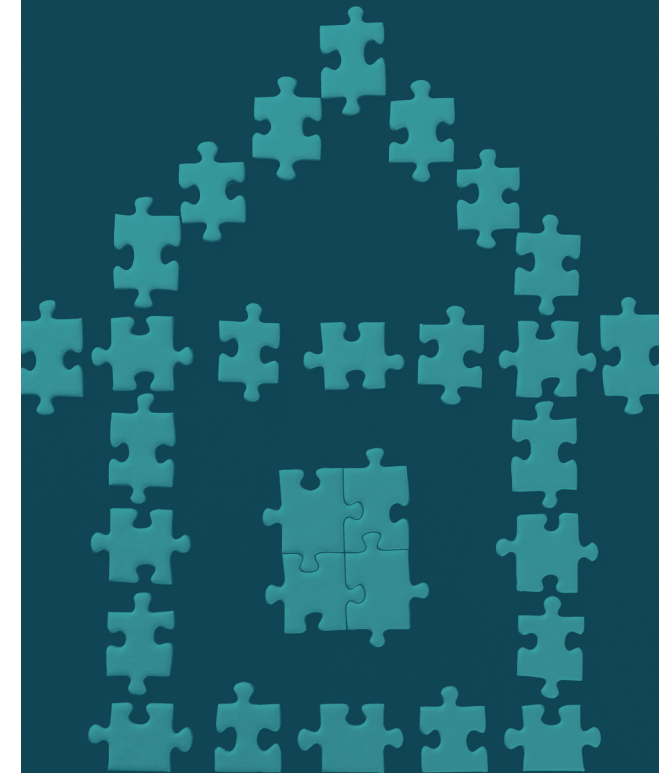
from which a person can be at risk of homelessness from 28 days to 56 days. This meant that housing authorities must work with people to prevent homelessness at an earlier stage. This is known as the extended prevention duty.

The Act aimed to reduce homelessness by improving the quality of the advice available and refocusing local authorities on prevention work and increasing support for single people.

The Act was also amended to allow Local Authorities to discharge their housing duty with an offer of private rented accommodation.

Further legislation that shapes how our homelessness services are provided are:

- **Mental Health Act 1983**
- **Localism Act 2011**
- **Welfare Reform Act 2012**
- **Care Act 2014**
- **Domestic Abuse Act 2021**



# The National Context

The following sets out the national situation and policy landscape that shapes and affects housing within Babergh and Mid Suffolk:

## **Covid-19 Pandemic and Recovery:**

On 11th March 2020, a Coronavirus pandemic, referred to as Covid-19, was declared by the World Health Organisation.

On 26 March 2020, the UK Government announced a wave of measures to try and reduce the spread of the virus and asked local authorities in England to “help make sure we get everyone in”, including those who would not normally be entitled to assistance under homelessness legislation and included an eviction ban for those households in rent arrears during the summer of 2020.

During the Covid 19 recovery period and following the lifting of the ban in October 2021 BMSDC saw an increase in households presenting as homeless and subsequently our temporary accommodation provision has been at full capacity with the use of bed and breakfast provision increasing.

## **Ending Rough Sleeping for Good:**

This is a cross-government strategy published in September 2022, setting out how the government and its partners plan to work together to deliver on the government’s manifesto commitment to end rough sleeping in this Parliament.

It also lays the foundations for long-term system change to end rough sleeping sustainably and for good. The ‘end goal’ of the Strategy is for ‘rough sleeping to be prevented wherever possible but when it does occur it should be rare, brief and non-recurring.’

The Strategy focuses on better prevention, swift and effective intervention, extra help to aid recovery and a more transparent and joined up system

## **Deprivation:**

The Index of Multiple Deprivation (IMD) is produced by the Government to rank nearly 33,000 neighbourhoods across England in terms of their relative deprivation.

Deprivation is measured based on 39 separate indicators, organised across seven domains: Income, Employment, Health & Disability, Education, Skills & Training, Crime and Living

Environment. Although deprivation levels are low in Suffolk compared with national levels, across Suffolk 28% of those identified as income deprived live in rural areas.

Both Babergh and Mid Suffolk are classified as predominantly rural areas Living in a very rural area is widely considered to cost households on average about 20% more than a similar household living in an urban area.

Existing pockets of deprivation within the districts will be exacerbated by the current Cost of Living Crisis.

## **The Social Housing (Regulation) Act 2023**

The Government published the Social Housing Green Paper: A New Deal for Social Housing in 2018 and the Social Housing White Paper: The Charter for Social Housing Residents in 2020 all with the aim of improving how social housing is regulated.

The 2023 Act consolidates a stronger and more proactive regulatory regime to drive up standards in the sector and hold landlords to account for the services they provide to their tenants.

# The Local Context

The following sets out the local situation and policy landscape that shapes and affects housing within Babergh and Mid Suffolk:

## **Our Plan for Babergh: A more resilient and sustainable future for Babergh: 2023 – 2027:**

This sets out the opportunities and challenges that will be focused on:

- Revitalised and improved Environment
- Thriving Economy
- Resilient Communities

## **Our Plan for Mid Suffolk: Helping to create thriving and resilient communities in Mid Suffolk: 2023 – 2027:**

This sets out the priorities and approach of Mid Suffolk District Council. Focusing on:

- Housing and Infrastructure
- Resilience
- Community and Wellbeing
- Environmental Sustainability

## **Babergh and Mid Suffolk District Council Joint Homes and Housing Strategy:**

In March 2019, both Councils adopted the Homes and Housing Strategy 2019 -2024. In October 2022, the Homes and Housing Strategy was refreshed to ensure it remained up to date.

The Homes and Housing Strategy Delivery Plan continues to be refocused annually to ensure it is reflective of the new priorities that have emerged since the original strategy and delivery plan was written in 2019.

The strategy has nine strategic aims and is monitored on a quarterly basis with an in-depth review every year.

## **Gateway to Home Choice Allocation Policy:**

Gateway to Homechoice is a choice-based lettings system, where social housing properties are advertised in the Local Authority areas of Babergh, Braintree, Colchester, East Suffolk, Ipswich, Maldon, and Mid Suffolk.

The scheme allows one point of access for customers to apply to a Local Authority housing register and be considered for available properties in any of the areas.

The scheme aims to provide a consistent approach to accessing housing across the diverse area of operation and where possible, to ensure that applicants have choice over where they live.

## **Strategic Housing Market Assessment:**

Ipswich Borough Council, Babergh and Mid Suffolk District Councils and Suffolk Coastal District Council and Waveney District Council (Now East Suffolk Council) jointly commissioned Peter Brett Associates to undertake a Strategic Housing Market Assessment (SHMA). The objective was to test and confirm the housing market geography and to produce conclusions on objectively assessed housing need.

The Ipswich and Waveney Area Strategic Housing Market Assessment 2017 (with a partial update in 2019) indicated a need for at least 110 affordable homes per year in Babergh 127 affordable homes per year for Mid Suffolk.



1

2

3

4

5

# Homelessness

Reduction and Rough Sleeping Strategy

# PRIORITIES

# Early upstream prevention & intervention

Preventing homelessness is of benefit to both the Council and applicants. Extended periods of homelessness and time spent in temporary accommodation can result in isolation from family support, employment and schooling and have a negative impact on both adults and children.

Early intervention strategies are designed to work quickly to support individuals and families to either retain their housing, or if that is not possible, to use rapid rehousing strategies to ensure people move into safe and appropriate accommodation with the support that they need.

The Housing Solutions Team has a frontline service comprising of early Intervention officers and a triage team who identify households contacting the service at an early stage before they become homeless and ideally before a significant risk of homelessness arises.

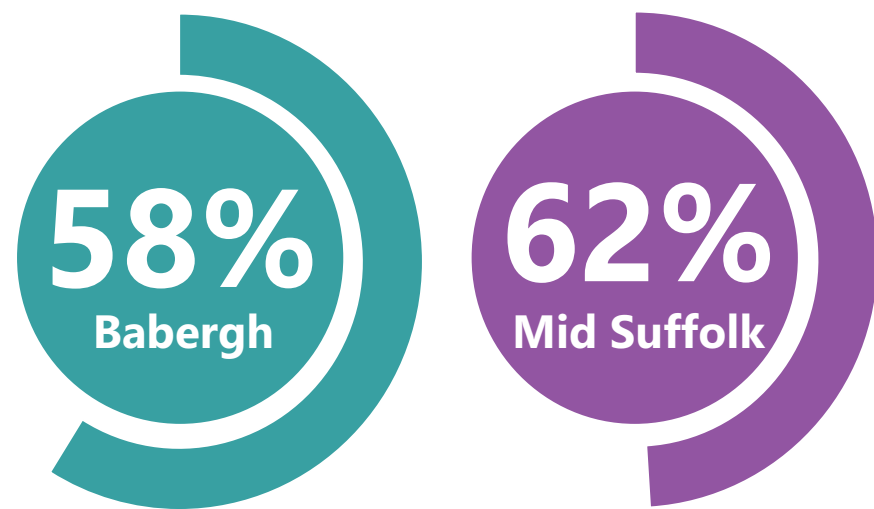
The use of the private rented sector plays a crucial role in this work and the utilisation of Central Suffolk Lettings remains key to increased success in the early intervention work we do.

Early upstream and early intervention work significantly reduces relief duty and main duty decisions which in turn allows Housing Solutions Officers to focus on relieving homelessness for those households who are already homeless, allowing for less negative decisions on homelessness applications.

The focus of BMSDC's early intervention work is to ensure a smooth journey for each client group through bespoke pathways, with wraparound support which results in sustained tenancies.

## Key Facts

Successful homelessness preventions have increased significantly since the establishment of the Early Intervention Team:



The establishment of the Early Intervention Team has significantly decreased the amount of time a Prevention Case is open for:

	2019 2020	2020 2021	2021 2022	2022 2023	2023 2024 so far
Babergh	<b>90</b> days	<b>105</b> days	<b>113</b> days	<b>72</b> days	<b>44</b> days
Mid Suffolk	<b>76</b> days	<b>101</b> days	<b>102</b> days	<b>72</b> days	<b>43</b> days

Intentional Decisions\* have decreased significantly since the establishment of the Early Intervention Team

	2019 2020	2020 2021	2021 2022	2022 2023	2023 2024 so far
Babergh	<b>7</b> Intentional Decisions	<b>6</b> Intentional Decisions	<b>4</b> Intentional Decisions	<b>3</b> Intentional Decisions	<b>3</b> Intentional Decisions
Mid Suffolk	<b>1</b> Intentional Decisions	<b>2</b> Intentional Decisions	<b>5</b> Intentional Decisions	<b>4</b> Intentional Decisions	<b>0</b> Intentional Decisions

\*Intentionally homeless means that you are homeless because you left accommodation that you could have stayed in, or you lost your home as a result of your actions.





# What we have already achieved

- Developed and implemented a comprehensive online advice service for clients to access housing options advice: Housing Aid <https://baberghmidsuffolk.adviceaid.uk/>
- Created and established the Early Intervention Team to focus on targeted, early and upstream intervention – 1 Team Manager and 4 Housing Solutions Officers focusing on early intervention work.
- Sustained tenancies and prevented homelessness by ensuring they remained financially viable via a team of Financial Inclusion Officers
- Established the Household Support Fund to work with households prior to the 56 days when they are threatened with homelessness under legislation.
- Delivered Domestic Abuse (DA) Champion Training, led by Housing Solutions DA Link Worker. DA Champions are located across Babergh and Mid Suffolk District Councils and have received DA awareness training to develop knowledge on asking, responding, supporting and signposting people affected by domestic abuse.
- Enabled those households working with the Domestic Abuse Link Worker to feedback via exit surveys online.
- Ensuring upstream work with domestic abuse cases to support those households to remain in their own homes if appropriate through safety and security measures called 'Target Hardening'.
- Focused early intervention work to significantly reduce the time officers are spending making decisions on homelessness applications.



## Case Study 1

*A single parent with three children was facing eviction from her Housing Association home due to rent arrears.*

*We only became aware of the situation four days before the scheduled Eviction date. Initially, the Housing Association demanded full payment of the substantial arrears.*

*When talking to the tenant, it became evident that her mental health struggles had prevented her from addressing the issue. She expressed a willingness to pay her full rent along with some arrears and accepted support from the Financial Inclusion Team to help manage her budget.*

*Efforts were made to negotiate with the Housing Association, offering to pay half of the arrears and provide a support package. The deal was finalized at the last minute, allowing her to keep her home, thus preventing homelessness for her and her children.*

*This outcome also saved the local authority the expense of emergency accommodation and spared the family from the trauma associated with it.*

## Case Study 2

*An elderly lady had a fall at home and was stuck in her bath unable to get out. She had a Social Housing tenancy.*

*It was a couple of days before she was found and eventually had to be rescued by the fire brigade before being admitted to hospital.*

*We were only notified by the hospital of the situation when she was due to be discharged. They advised she was unable to access stairs and she would not be able to return to her home and would be homeless.*

*This coincided with a hard to let property becoming available in an area where she wanted to live. The Early Intervention Team sourced all the necessary documentation, applied to the Gateway and within two days her application was active, and a bid was placed on her behalf for the property.*

*She was able to move to the new property direct from hospital as we were able to negotiate with the hospital for a delay to discharge to prevent her becoming homeless.*

# What we will be doing next

- Establishing the team processes and links to in house teams especially the Financial Inclusion Team and Central Suffolk Lettings, statutory and third sector agencies particularly Citizens Advice to complement service delivery.
- Setting up Protocols with other agencies to formalise early-intervention multi agency arrangements with Probation, Prisons, Hospitals, Adult Care Services and Childrens and Young Peoples services to work collaboratively and prevent homelessness for our most vulnerable residents.
- Establishing Early Intervention Hubs in our districts for face-to-face meetings facilitating more effective communication, helping to build strong relationships and increase engagement.
- Considering how we can best serve the needs of our rural communities and consider the viability of a mobile customer access point for housing services.
- Working towards obtaining Domestic Abuse Housing Alliance (DAHA) accreditation; to raise awareness of Domestic Abuse to enable a proactive not reactive service, focussing on households remaining in accommodation or working towards more managed moves.
- Participating in Shelter's 'Systems Change in Homelessness Services' project
- Creating a 'fast-track' referral system to Central Suffolk Lettings to ensure cases where homelessness can be prevented quickly through the use of the Rent Guarantee Scheme are prioritised and dealt with effectively.
- Establishing a Housing Forum to promote co-ordination and co-operation with partners.



# Making rough sleeping rare, brief and non-recurring

Rough sleeping in our districts has been reduced significantly by rapid intervention for those individuals who are new to rough sleeping and by prevention methods for those that are at risk of rough sleeping.

However, many long-term rough sleepers have high levels of complex needs including mental health problems, drug and alcohol dependencies, and institutional experiences which needs a more tailored approach alongside supporting agencies.

There are relatively low numbers of rough sleepers across our districts and the Rough Sleeper Team will verify and act upon information received as soon as possible, working with partner organisations, and using resources to provide an immediate place of safety for rough sleepers to stay, an assessment of their needs and access to other services such as healthcare and support.



## Key Facts

Since the 1st of April 2020:

# 41

rough sleepers in Babergh have secured long-term accommodation



# 37

rough sleepers in Mid Suffolk have secured long-term accommodation



Since the 1st of April 2020 of the referrals received only:

# 11%

of Rough Sleeper referrals in Babergh have been verified as rough sleeping

# 10%

of Rough Sleeper referrals in Babergh have been verified as rough sleeping

Following enquiries, the remainder of the referrals had accommodation that was available to them.

As of 31st January 2024,

# 23 Clients

# 15 Clients

there are 23 clients supported in tenancies in Babergh and 15 clients supported in tenancies in Mid Suffolk.

These individuals have all either been through the Rough Sleeper Pathway or have been identified as being at risk of Rough Sleeping.

# What we have already achieved

- Ensured contact is made with all rough sleepers within 24 hours of receiving a referral.
- Accessed funding streams, when available, for additional support to tackle rough sleeping following the initial Successful Rough Sleeper Initiative bid in 2019.
- Provided suitable accommodation for rough sleepers in extreme weather conditions under the Severe Weather Emergency Provision.
- Provided regular outreach work to those individuals who have disengaged from services, to facilitate on-going support.
- Participated in multi-agency panels to manage, monitor and find housing solutions for the hardest to house clients.
- Procured 19 specialist bed spaces where rough sleepers are accommodated, including street to step beds, transitional beds and move on units.
- Supported service users in settled and move on accommodation to sustain their tenancies.
- Procured the services of BEAM to work with service users who have been marginalised from work, training and education to provide opportunities to get back into employment.





## Case Study 1

*In March 2021, a referral was received for an applicant in his 60s, he had been diagnosed with cancer and other severe medical conditions and he was living with his dog in dire conditions, including an unheated industrial unit and a hot/cold portacabin without basic amenities.*

*The applicant had difficulties with official documentation and procedures which hindered interactions with the Council's Housing Department. However, through face-to-face meetings and clear explanations, a rapport was built.*

*By May 2021, the applicant completed a Gateway to Homechoice application, securing a Band B award on the Housing Register. In August 2021, he accepted temporary accommodation in Elmswell, and in February 2022 he accepted permanent accommodation.*

*Throughout his journey, the applicant was supported with grants for household items, benefit transfers, utility setup, and a gradual transition to self-sufficiency.*

*The applicant now has access to support, should he need it, from a nearby Sheltered Housing Unit's warden.*

*The applicant is very grateful to BMSDC for the support, accommodation, and a garden for his aging dog.*

## Case Study 2

*In the summer of 2023, a single woman, in her 40s, was found living in an unsecured caravan in a lorry park, prompting concerns about her safety and well-being. In early 2020 she had been evicted from a tenancy due to drug use and criminal activity and had struggled with homelessness for several years.*

*Her housing instability stemmed from a history of failing to engage with support services despite disclosing domestic abuse and mental health issues, including bipolar disorder, PTSD, depression, and social anxiety, for which she was medicated. She also admitted a drug addiction but has not consistently engaged with drug and alcohol services.*

*During the COVID-19 pandemic, she was temporarily accommodated but was later considered to be intentionally homeless due to her previous eviction. Complaints from other residents about drug use led to her accommodation being changed multiple times.*

*In 2023 a multi-agency approach involving the police, health outreach, and the local council was initiated. Daily welfare visits were scheduled to engage with her, and she was fast-tracked for a prescription for methadone. She was eventually offered temporary accommodation with modifications to address her specific needs and risks, and as of September 2023, she remains in temporary accommodation with ongoing support from services.*

# What we will be doing next

- Training for staff to identify root causes of recurring rough sleeping and unstable housing histories, for rough sleepers with complex needs, using person-centred trauma informed interview techniques.
- Engaging multiple agencies through co-production and joint protocols to provide intensive support, including Mental Health, NHS outreach teams, and drug and alcohol services.
- Contributing to cross- county co-production work with Campbell Tickell Consultants to establish a multi-district approach to service delivery, commissioned by the Suffolk Housing Board.
- Vision and forward planning for the ending of Rough Sleeper Initiative funding in 2025 including team structure and continuation of service delivery.
- Evaluating further opportunities with Rough Sleeper Accommodation Programme accommodation.
- Considering utilising the Make Every Adult Matter (MEAM) model. This model helps local areas design and deliver better coordinated services for people experiencing multiple disadvantages.





# Ensuring the health and wellbeing needs of households are met whilst in temporary accommodation

This strategy is committed to preventing homelessness and minimising the use of Temporary Accommodation (TA). However, if a household needs to go into TA, we are also committed to ensuring that the journey through TA is used to facilitate positive health and well-being outcomes and does not become part of the 'homelessness trauma.'

The amount of time spent in TA can be dramatically reduced by continuing to work with households under a relief duty.

We are striving to improve the whole journey through TA for all households by increasing opportunities for sign posting and multi-agency engagement.

We are aiming to introduce a 'Homelessness Plus Service' which uses a person-centred approach and signposts each household according to their specific needs.

Official figures show that nationally almost 104,510 households were in TA at the end of March 2023. This is a 25-year high and includes more than 131,000 children, the highest level since records for that measure began in 2004. We will be focusing on children in temporary accommodation and implementing measures to limit the impact on their education, health and socialisation.

3

PRIORITY

# Impact of Homelessness on Children:

National research from a survey of homeless families funded by Trust for London and Joseph Rowntree Foundation and reported by Shelter in December 2022, shows:



**Sharing beds:** more than a third (35%) of homeless parents say their child(ren) do not have a bed of their own and are forced to share a bed with another family member.



**Mental Health:** 1 in 4 parents (26%) report their child or children being often unhappy or depressed because of living in temporary accommodation.



**Education:** almost half (45%) of school age children have arrived at school tired, late or hungry because of living in temporary accommodation. B&Bs and hostels are often not equipped with suitable or any facilities for parents to cook meals for their children, and noise from other residents and bed-sharing means children often struggle to sleep.



**Social Isolation:** more than 1 in 4 parents (28%) say their children are finding it hard to make or keep friends because of living in temporary accommodation. This can be the result of feeling embarrassed or ashamed of where they live, or because they are unable to have friends to play due to a lack of space or rules that forbid visitors.



**Play:** 6 in 10 (61%) children lack space to play in their temporary accommodation.

## Key Facts



### Babergh

has 74 units of Temporary Accommodation  
5 bedsits, 33 rooms, 20 One beds, 8 Two beds,  
7 Three beds and 1 Four bed



### Mid Suffolk

has 43 units of Temporary Accommodation  
3 bedsits, 15 rooms, 9 One beds, 10 Two beds,  
and 6 Three beds

### Average number of days spent in Temporary Accommodation:

2019 2020	2020 2021	2021 2022	2022 2023
127 days	152 days	193 days	150 days
111 days	119 days	147 days	114 days

● Babergh ● Mid Suffolk

### Children in Temporary Accommodation:

As of 31st January 2024:

**38%** of individuals accommodated in TA in Babergh are children.

**33%** of individuals accommodated in TA in Mid Suffolk are children.





# What we have already achieved

- Established 4 Temporary Accommodation refuge sites, where we provide 'ready to move in' furnished properties with food parcels, children's toys and books, household items, kitchen utensils and new bedding.
- Appointed a second Resettlement Officer to focus on enabling households in TA to be actively looking for housing opportunities, maximising incomes and ensuring households are tenancy ready.
- Enabled exit surveys to be completed online for all households who are accommodated in TA.
- Secured 12 units of temporary accommodation with Sanctuary Housing which also provide a higher level of support for single people.
- Procured the services of BEAM - Beam Homeless Social Enterprise - Sponsor a Homeless Person in the UK Into a Job to assist marginalised service users into employment, education and training.
- Joined the Suffolk Information Partnership to improve referral routes into community support for health and wellbeing.



# Case Study 1

*In May 2023 a woman and her two children presented to BMSDC following a relationship breakdown, the family were initially placed in emergency hotel accommodation.*

*The Resettlement Officer (RO) made initial contact via email preparing the woman with an introduction to her role, arranging a convenient time to meet and advising her of what information would be helpful for her to bring to the appointment to make benefit applications and assist to get her active / fast tracked on Gateway To Homechoice (GTHC).*

*The RO met the family the next day, at the hotel in person to assist with applications, sending a fast-track request to Choice Based Lettings (CBL) to activate her online application. The application was made active the following day, as all necessary information was received. RO called her that same day and advised her she was now active and able to bid.*

*The following week, applicant was moved to alternative Temporary Accommodation (TA) within our own stock, RO again assisted with Housing Benefit Change of Circumstances form for the move, thus avoiding any rent arrears in TA from accruing.*

*Whilst in TA, RO monitored bidding cycles, encouraging app to bid on suitable available properties in the required*

*areas for children's school/ work commitment and family support.*

*In early July 2023 she was successful in her bid for permanent accommodation, RO then began to assist her with making applications to charitable organisations for furniture that she didn't have, including beds and securing a grant for all white goods and arranging delivery to new property for her to be able to move on as quickly as possible from TA.*

*At the end of July 2023, RO visited the lady at her new home. Assisting her with going through her welcome pack from her housing provider. She showed her where all the meters were and how to read them, assisted with completing a further Housing Benefit Change of Circumstances form and how to notify Universal Credit of her new address, adding housing cost information. RO also assisted with calls to utility suppliers and ordering waste bins to be delivered to her new address.*

*The face-to-face and regular engagement allowed the RO to develop a positive and effective working relationship with her, achieving a positive outcome for her by enabling her to become active on GTHC, maximise her income with benefit applications, preventing any arrears and helping her to move on from TA quickly.*

# 3

# PRIORITY

## Case Study 2

*The applicant was in an abusive relationship and fled when her second son was only a few weeks old. English was not her first language, and she was seeking assistance with securing leave to remain in the UK.*

*When she left, she had no funds for necessities, but a Domestic Abuse Link Worker (DALW) helped secure items like nappies and baby milk and The Housing Solutions Team arranged temporary accommodation for her.*

*She left during the winter and lacked suitable clothing for the cold weather and had no social circle outside her home due to restrictions imposed on her by her abusive partner.*

*With assistance from an Independent Domestic Violence Advisor (IDVA) and The Phoebe Centre, she moved into the temporary accommodation with her children.*

*The DALW guided her through social housing registration, taught her household skills, and even facilitated a Winter Warmer clothing package, toy donations, and funding for a playgroup.*

*She received help with the transition from temporary accommodation to her new home, including appliances, curtains, bedding, and utility registrations.*

*Ongoing support and connections to support networks have made a significant and positive impact on her life.*

*The applicant's journey from escaping an abusive relationship to finding safety and support involved various agencies working together to provide crucial assistance, helping her rebuild her life and regain her peace of mind. The collaborative efforts of these teams ensured her well-being and a brighter future.*



# What we will be doing next

- Introducing a minimum standard of temporary accommodation for children; including provision of sterilising equipment, child and baby equipment such as stairgates and age-appropriate books and toys.
- Providing continuous resettlement work which is person-centred and lasting.
- Completing a Rent and Service Charge review for all temporary accommodation.
- Refurbishing and creating extra rooms in a current unit of temporary accommodation (The Lees).
- Implementing a project of planned work and upgrades on all temporary accommodation alongside Building Services.
- Making adaptations to a new temporary accommodation unit to create adapted rooms which are wheelchair accessible for households with mobility issues (Eve Balfour House).
- Ensuring Wi-Fi and internet access is available at each site with accompanying digital skills training from the Cost-of-Living Team.
- Establishing an accommodation-based approach to temporary accommodation based on a – variation of the Housing First model.
- Providing Pre tenancy training for all households in temporary accommodation (A pilot started on 26/09/2023).
- Exploring setting up a notification system which ensures that, at the point a household registers as homeless, relevant existing services are informed such as education, health and social care.
- Destigmatising temporary accommodation and homelessness by sharing experiences in a realistic and respectful way ensuring that we are not reinforcing unhelpful attitudes and stereotypes.
- Adding testimonials from households and virtual tours and reviews of TA filmed with tenants onto our website.
- Improving our TA green spaces, encouraging gardening interaction from residents to assist with improving general health and wellbeing.

# Expanding and future proofing the role and remit of Central Suffolk Lettings to continue to improve access to the private rented sector

Increasing our residents access to the Private Rented Sector minimises the use of Bed and Breakfast Accommodation and reduces the demands on Temporary Accommodation.

Discharging more housing duties into the private sector can often be a quicker solution to finding a new home, offers more choice in positive housing outcomes and allows social housing to be retained for those households that most need it.

Launched in Spring 2020 the Central Suffolk Lettings service is committed to building long term, sustainable relationships with landlords and letting agents to offer a wide range of good quality, affordable and secure tenancies in the private rented sector.





## Key Facts

### Homelessness Duties discharged via Central Suffolk Lettings:

Since the establishment of CSL  
Homelessness has been discharged via CSL:

**124 times** in Babergh

**108 times** in Mid Suffolk.

### Current Central Suffolk Lettings tenancies:

As of 31st December 2023:

**53** in Babergh

**42** in Mid Suffolk.

### Percentage increase over the years to now:

- In Babergh there has been an 81% increase in the number of ongoing tenancies as of 31st March 2023, compared to same period the prior year.
- In Mid Suffolk there has been an 150% increase in the number of ongoing tenancies as of 31st March 2023, compared to same period the prior year.

### Central Suffolk Lettings: Benefits of letting a property with us: Current offer to Landlords:

- Guaranteed rent payment for the term of the tenancy:
- No loss of rent. Rent paid on time in full every month (by us). Rent, set at the LHA rate + 10%
- Cash incentive: For each property you place with us through the Rent Guarantee Scheme we will give you a one-off cash incentive.
- No fees. No commission: We provide a free service, so there is no commission to pay and no hidden charges.
- Assessment of potential tenants: We carry out full affordability assessments on any potential tenants we put forward to you.
- Accompanied viewings: All property viewings will be arranged by us and will be fully accompanied with timely feedback to you.
- Deposit Bond: We will provide one month's deposit bond to cover the required deposit (*Because we are a local authority providing a bond, there is no requirement for you to register the deposit*).
- Inventory and regular inspections: We will compile an inventory on your behalf before the tenant moves into the property and will conduct a routine inspection six-monthly. We will also carry out a check-out inspection.

# What we have already achieved

- Cemented Central Suffolk Lettings as a well-established brand with an online presence and a growing portfolio of properties.
- Carried out a survey of Landlords to inform direction for the service: 99.5% of landlords surveyed in our 2023 survey rated our service 'highly' or 'very highly'.
- Negotiated Houses of Multiple occupation (HMOs) through work with landlords to meet the needs of under 35s limited in the private sector by local housing allowance rates: a 3 bed HMO in Stowmarket is in the CSL portfolio.
- Collaboration with the Empty Homes Team and landlords to bring properties back into use through the CSL schemes.
- CSL attended the Suffolk Show and Business Fayres and are actively looking for other opportunities to promote the scheme.



## Case Study 1

*In the Spring of 2021, a man in his late 60s faced sudden homelessness when his 22-year-long relationship ended unexpectedly, forcing him to leave the family home.*

*He was struggling with high blood pressure and emotional distress from the breakup and from having to part ways with his youngest son and seek new accommodation.*

*His eldest son in Suffolk was able to offer him accommodation on a temporary basis. He was well aware of the long wait for social housing and the scarcity of affordable private rented accommodation.*

*His Housing Solutions Officer referred his case to Central Suffolk Lettings, who successfully found him a one-bedroom house in Chelmondiston.*

## Testimonials from Landlords:

*"I chose to let via BMSDC because I feel slightly uncomfortable about being a landlord. I believe that 'commercial' rents are too high. The rent I receive through this arrangement is lower than I might receive on the open market but, in return, BMSDC find me a fully vetted tenant and take responsibility for collecting rent (while paying me direct).*

*This saves me much anxiety and makes for an easier landlord-tenant relationship."*

*"I would have no problem in recommending Central Suffolk Lettings to other agents and tenants alike. A really effective way of helping tenants that do not quite fit agents' criteria who have nowhere else to turn."*



# What we will be doing next

- Providing Pre-tenancy training, in conjunction with the Stone Foundation to contribute to maintaining tenancies, returning tenancies in a better condition, decreasing Anti-Social Behaviour and preventing homelessness,
- Further promoting CSL to extend its reach, including 'to let' boards and targeted advertising.
- Creating a new website and increasing our online presence
- Acting on the results of the recent survey of Landlords, including considering extending the current Landlord's package or delivering an extended service.
- Expanding CSL's HMO Portfolio with the addition of 2 five bed HMOs in Needham Market
- Raising our profile within the organisation by linking in with Economic Development and Planning Teams to provide an offer at the start of housing development.
- Building on the Empty Homes project including more publicity, communication and an offer to landlords to work with us.
- Being an active part of the Landlords Forum, in partnership with Safe Suffolk Renters
- Procuring a new Tenancy Management system to support the growing business.
- Considering a charge to landlords who come onto the scheme. This could generate an income for Babergh and Mid Suffolk District Councils.
- Quantifying the cost saving value of CSL to BMSDC



# Mitigating against the impacts of the cost-of-living

The rising costs of fuel, food and other essentials are combining with existing disadvantage and vulnerability within our communities to put many households at greater risk of both immediate hardship and reduced opportunity and wellbeing.

This impacts on some people and communities more than others and many households face stark financial challenges with increasing food and energy bills.

Homeless households can face additional barriers in accessing information and support and we need to consider the impact of the cost of living at every stage of homelessness both in order to proactively prevent homelessness, but also when relieving it by making sure we have considered the cost of living and affordability, to ensure we are setting our homeless applicants up to succeed.

In May 2022 Babergh and Mid Suffolk District Councils (BMSDC) launched a five-point action plan to support residents through the cost-of-living crisis.

The Cost-of-Living Crisis Action Plan brings together a suite of measures that focus on maximising income, accessing advice, food insecurity and poverty, fuel poverty and Health and Wellbeing.

The Action Plan is reviewed regularly as there are many unknowns and potential challenges ahead that cannot be fully predicted, such as global challenges, market volatility, rising inflation and the everyday changing landscape regarding people's household budgets.

Housing costs continue to add to the financial strain for households. There has been no increase to the Local Housing Allowance for those who rely on benefits to pay their rent.

Mortgage interest rates continue to rise sharply as a result of increases to the Bank of England base rate, leaving lower income homeowners concerned about the prospect of managing drastically increasing mortgage costs.

All of this converges to increase the risk of households becoming homeless.

# BMSDC Cost of Living Support:

In May 2022 Babergh and Mid Suffolk District Councils launched an action plan to support residents through the cost-of-living crisis. This is an evolving document but is currently focusing on:

**Maximising Income** to ensure that households have the tools they need make their money go further. This can mean accessing emergency financial assistance to alleviate crisis, as well as opportunities to grow household income over the longer term.

**Accessing Advice** to ensure that households are able to access specialised advice to navigate the assistance available and identify solutions to prevent and alleviate crisis.

**Food Insecurity and Poverty** to ensure that emergency food provision remains accessible to those experiencing crisis, while longer term interventions are explored which would reduce dependency on foodbanks.

**Fuel Poverty** to ensure that those unable to heat their homes have access to emergency fuel support and warm community spaces, while longer term support is provided to improve energy efficiency.

**Health and Wellbeing** to ensure that an array of measures are adopted to safeguard the wellbeing of those at risk of hardship due to the cost of living.

As the crisis has evolved the Cost-of-Living Plan has been updated and a refreshed plan sets out additional areas of focus, which are:

- Responding to the changing needs of our residents
- Identifying steps to support people through the current crisis
- Building longer term resilience across our communities

Further details can be found:

<https://www.babergh.gov.uk/benefits/cost-of-living-support/>

<https://www.midsuffolk.gov.uk/benefits/cost-of-living-support/>



## Key Facts

### Amount of £ secured by Financial Inclusion Officers:

From 1st April 2019 to 31st December 2023

**£276,586.78** Babergh

**£268,722,98** Mid Suffolk

### Number of households assisted via the Household Support Fund since April 2022:

**117** Babergh

**146** Mid Suffolk

## Case Study 1

*A visually impaired single man residing in a two-bedroom council property faced financial challenges due to the bedroom tax, resulting in rent arrears of approximately £1400.*

*Efforts were made by a Financial Inclusion Officer (FIO) to secure Housing Benefit coverage for the second bedroom due to disability-related sensory equipment storage, but this request was denied.*

*An application for Discretionary Housing Payment (DHP) to bridge the gap was also declined.*

*Given these challenges, the tenant was presented with options: downsizing to a smaller property or re-evaluating income and expenditures to make the second bedroom affordable. Collaborating with the FIO, adjustments were made to outgoing expenses to make the rent more sustainable.*

*With no extra income available for setting up a payment plan for the arrears, which were considered static (not increasing), an application was then submitted to the Household Support Fund (HSF) to clear the outstanding arrear, ultimately securing an award of £1400 from HSF to prevent the risk of eviction.*



# Cost of Living: Local Impact

- The average number of monthly Local Welfare Assistance applications (a hardship fund administered by Suffolk County Council) has continued to increase, with 2023 seeing an average of 1472 applications per month, an increase of 44% compared to the previous year.
- Both Citizens Advice offices across Babergh and Mid Suffolk saw record levels of advice in 2023, with their busiest ever months for debt, benefits and housing advice. Both offices also saw record levels of requests for crisis support such as charitable help and foodbank referrals. Meanwhile, National Citizens Advice reports that over 50% of their clients are now in a negative budget after only essential bills- meaning more than half of clients are unable to meet basic needs before accruing debt.
- As of January '24, while the percentage of our tenants who have rent arrears has not increased compared to last year, at the end of Q3 the average debt owed by tenants had increased by 6% compared to the previous year. This shows that those falling behind are experiencing deeper levels of debt.
- It is worth noting that the Household Support Fund has helped many tenants to reduce and clear their rent arrears, and consequently will likely have had a mitigating effect on these figures.
- Foodbanks continue to report increases in referrals, however both Sudbury Storehouse and Stowmarket Foodbank noted a temporary reduction in demand as households received their cost of living payments through benefits such as Universal Credit. This provided foodbanks with much needed breathing space to replenish stocks.
- We are conscious that much of the crisis support may be less available in the new financial year, due to the likely loss of the Household Support Fund and cost of living payments to households on means tested benefits. Early intervention through our Financial Inclusion and Early Intervention Teams, as well as partnership working with organisations like Citizens Advice, will be crucial to helping our residents to navigate these increasing financial pressures at a time when crisis support is set to become less accessible.



# What we have already achieved

- Continued to work closely with the Department of Work and Pensions (DWP) and Citizens' Advice (CA) to tackle the impacts of welfare reforms and the roll out of Universal Credit
- Monitored repayment agreements and the number of evictions for rent arrears to consider the success of our budgeting advice and affordability checks, so we can help clients to manage their income effectively.
- Introduced an Internal referral form between BMSDC and Mid Suffolk CA to speed up the referral process and to get help quickly to those who need it.
- Launched a Fuel Poverty Toolkit for frontline members of staff to use.
- Updated our webpages to ensure that residents can be signposted effectively to other agencies for advice and support.
- Established the Household Support Fund (funded by Central Government) for households to apply to if they are struggling to pay rent or service charges.
- Sent targeted communications to Temporary Accommodation tenants and BMSDC tenants to highlight advice and help available and to encourage accessing support earlier.
- Worked holistically with other teams to maximise opportunities to help households struggling with rising costs.
- Administered Winter Warmth Grants for Community Spaces.
- Mapped all the food banks operating in the districts and shared this information.



# What we will be doing next

- Delivering a pilot with 'The Good Things Foundation' which will give free data to households at 2 Temporary Accommodation sites; to help reduce digital exclusion. This will be in addition to digital skills training from the Cost-of-Living Team.
- Using Data Mapping to look at deprivation in the districts and using this intelligence to pinpoint areas for further targeted communications and early intervention work
- Building stronger links with the Communities and Rents Teams to target areas where collaborative working would bring benefits for residents; including using Rent Sense data to target where help is needed
- Introducing an Internal referral form between BMSDC and Babergh Citizens Advice (CA) to speed up the referral process and to get help quickly to those who need it (similar to the process set up between BMSDC and Mid Suffolk CA)
- Taking part in a pilot with Anglian Water to ensure Social Tariffs are more easily accessible.
- Continuing with targeted communications campaigns as and when required to ensure residents are kept well informed
- Signposting to appropriate low-income tariffs when households move from temporary to permanent accommodation
- Taking part in the development of a Food security plan for Suffolk alongside Community Action Suffolk





# Consultation

Babergh and Mid Suffolk District Councils ran a consultation on the draft Joint Homelessness Reduction and Rough Sleeping Strategy to:

- Ensure that the vision and the priorities of the Strategy were supported by residents
- To gather feedback to inform any necessary amendments to the draft Strategy and Delivery Plan
- To hear specifically from people with lived experience of homelessness/rough sleeping or being threatened with homelessness/rough sleeping

An Online Consultation Survey was 'live' from Monday 4th December 2023 to Sunday 14th January 2024. The Survey was promoted via X, Facebook, LinkedIn, Internal Communications with Staff, direct email to people registered for housing through Gateway to Homechoice, direct email to residents signed up for resident engagement through CitizenLab.

In addition: briefing sessions were held with Members, and sessions were held with the Tenant Board and Mid Suffolk Citizens Advice. In total 118 people completed the survey

Following analysis of the survey responses:

- The Vision was amended to align with the vision of the ongoing cross-county work.
- The 5 priorities were overwhelmingly supported by respondents and were not changed.
- There were some amendments to the Delivery Plan.

For further details and information please see appendix C: Consultation Feedback Report and Analysis.



# Monitoring and Governance

This Strategy will be monitored and governed through a Delivery Plan.

The Delivery Plan is designed to underpin the whole Strategy and will be under constant review through regular updates from Action Owners which will inform Quarterly Updates to the Housing Programme Board and an Annual Review by the Overview and Scrutiny Committee.

This robust process will ensure that the Delivery Plan remains current and relevant, both a measure of work to be completed in order to meet the aims of the Strategy and a measure of what has been achieved.

The Delivery Plan is available on our website, alongside this Strategy. Visit: [www.Babergh.gov.uk](http://www.Babergh.gov.uk) or [www.Midsuffolk.gov.uk](http://www.Midsuffolk.gov.uk)



# Homelessness

## Reduction and Rough Sleeping Strategy



dream

April 2024

This page is intentionally left blank



Task Name	Action Owner Role:	Start Date	Target Date:	Status
<b>HOMELESSNESS REDUCTION &amp; ROUGH SLEEPING STRATEGY 2024: DELIVERY PLAN</b>				
<b>PRIORITY 1: Early upstream Prevention &amp; Intervention</b>				
1.1. Establish the team processes and links to in house teams, especially the Financial Inclusion Team and Central Suffolk Lettings and statutory and third sector agencies, particularly Citizens Advice, to complement service delivery.	Early Intervention Team Manager, Tenancy Support Team Manager, Team Manager - CSL and Business Support	Started	September 2024	In Progress
1.2. Set up Protocols to formalise early-intervention multi agency arrangements with Probation, Prisons, Hospitals, Adult Care Services and Children's and Young Peoples Services.	Early Intervention Team Manager, Solutions Team Manager	Started	September 2024	In Progress
1.3. Establish 'Early Intervention Hubs' in our districts for face-to-face meetings; to include building stronger links with the Communities and Rents Teams to target areas where collaborative working would bring benefits for residents; including using Rent Sense data to target where help is needed.	Early Intervention Team Manager	Started	April 2024	In Progress
1.4. Consider how we can best serve the needs of our rural communities and consider the viability of a mobile customer access point for Housing Services.	Early Intervention Team Manager	Started	April 2024	In Progress
1.5. Work towards obtaining Domestic Abuse Housing Alliance (DAHA) accreditation.	Tenancy Support Team Manager	June 2024	December 2025	Not Started
1.6. Participate in Shelter's 'Systems Change in Homelessness Services' project.	All Housing Solutions Team Managers	February 2024	June 2024	Not Started
1.7. Establish a Housing Forum to promote co-ordination and co-operation with partners.	Housing Solutions Service Manager	April 2024	September 2024	Not Started
<b>PRIORITY 2: Making Rough Sleeping rare, brief and non-recurring</b>				
2.1. Provide training in 'person-centred trauma informed interview techniques' for staff to identify root causes of recurring rough sleeping and unstable housing histories.	Supported Lettings Team Manager	September 2024	April 2025	Not Started
2.2. Engage with Mental Health Services, NHS Outreach Teams, and Drug and Alcohol Services to co-produce Joint Protocols to provide intensive support to Rough Sleepers.	Supported Lettings Team Manager	April 2024	September 2024	Not Started
2.3. Contribute to cross- county work with Campbell Tickell Consultants via the Suffolk Housing Board to establish a multi-district approach to service delivery.	Supported Lettings Team Manager	Started	March 2025	In Progress
2.4. Plan for the ending of Rough Sleeper Initiative funding in 2025 to ensure continuation of service delivery.	Supported Lettings Team Manager, Finance Business Partner - Revenue	Started	March 2025	In Progress
2.5. Finalise the Rough Sleeper Accommodation Programme accommodation.	Supported Lettings Team Manager	Started	April 2024	In Progress
2.6. Consider utilising and embedding the Make Every Adult Matter (MEAM) model to deliver better coordinated services for people experiencing multiple disadvantages.	Supported Lettings Team Manager	June 2024	April 2025	Not Started
<b>PRIORITY 3: Ensuring the Health and Wellbeing needs of households are met whilst in Temporary Accommodation</b>				
3.1. Introduce a minimum standard of Temporary Accommodation for children.	Accommodations Team Manager	April 2024	September 2024	Not Started

Task Name	Action Owner Role:	Start Date	Target Date:	Status
19 3.2. Provide continuous and person-centred resettlement support.	Accommodations Team Manager	Started	Ongoing	In Progress
20 3.3. Complete a Rent and Service Charge review for all Temporary Accommodation.	Accommodations Team Manager	Started	April 2024	In Progress
21 3.4. Refurbish 'The Lees' Temporary Accommodation to create extra rooms.	Accommodations Team Manager	June 2024	April 2025	Not Started
22 3.5. Implement a project of planned work and upgrades on all temporary accommodation alongside Building Services.	Accommodations Team Manager	April 2024	September 2024	Not Started
23 3.6. Make adaptations to Eve Balfour House to create adapted rooms which are wheelchair accessible.	Accommodations Team Manager	Started	August 2024	In Progress
24 3.7. Improve green spaces at our Temporary Accommodation sites and encourage gardening interaction from residents to assist with improving general health and wellbeing:	Accommodations Team Manager	September 2024	April 2025	Not Started
25 3.8. Establish an accommodation-based approach to Temporary Accommodation based on a variation of the Housing First model.	Accommodations Team Manager	Started	Ongoing	In Progress
26 3.9. Provide Pre tenancy training for all households in Temporary Accommodation.	Accommodations Team Manager	Started	Ongoing	In Progress
27 3.10. Explore setting up a notification system which ensures that, at the point a household registers as homeless, relevant existing services are informed such as education, health and social care.	Accommodations Team Manager	September 2024	April 2025	Not Started
28 3.11. Add testimonials from households and virtual tours and reviews of Temporary Accommodation filmed with tenants onto our website.	Accommodations Team Manager	September 2024	April 2025	Not Started
29 <b>☐ PRIORITY 4: : Expanding and future proofing the role and remit of Central Suffolk Lettings to continue to improve access to the Private Rented Sector</b>				
30 4.1. Provide Pre-tenancy training, in conjunction with the Stone Foundation, to contribute to maintaining tenancies, returning tenancies in a better condition, decreasing Anti-Social Behaviour and preventing homelessness.	Team Manager CSL and Business Support	October 2023	October 2024	In Progress
31 4.2. Further promote Central Suffolk Lettings to extend its reach, including 'to let' boards, targeted advertising and increase Member awareness and understanding.	Team Manager CSL and Business Support	Started	Ongoing	In Progress
32 4.3. Create a new website and increasing Central Suffolk Letting's online presence	Team Manager CSL and Business Support	September 2024	March 2025	Not Started
33 4.4. Review the current offer to Landlords including considering extending the current Landlord's package, delivering an extended service and charging landlords who come onto the scheme. (To generate an income for BMSDC)	Team Manager CSL and Business Support	September 2024	March 2025	Not Started
34 4.5. Expand Central Suffolk Letting's HMO Portfolio with the addition of 2 five bed HMOs in Needham Market	Team Manager CSL and Business Support	September 2024	March 2025	Not Started
35 4.6. Raise CSL's profile within BMSDC by linking in with Economic Development and Planning Teams to provide an offer at the start of housing development.	Team Manager CSL and Business Support	April 2024	Ongoing	Not Started
36 4.7. Build on the Empty Homes Project including more publicity, communication and an offer to landlords to work with CSL.	Team Manager CSL and Business Support	April 2024	Ongoing	In Progress
37 4.8. Take active part in the Landlord's Forum in partnership with Safe Suffolk Renters	Team Manager CSL and Business Support	November 2023	Ongoing	In Progress
38 4.9. Procure a new Tenancy Management system to support the growth of CSL	Team Manager CSL and Business Support	September 2024	January 2025	Not Started



Task Name	Action Owner Role:	Start Date	Target Date:	Status
39 4.10. Quantify the cost saving value of CSL to BMSDC	Team Manager CSL and Business Support	February 2024	June 2024	In Progress
40 <b>▣ PRIORITY 5: Mitigating against the impacts of the cost-of-living.</b>				
41 5.1. Work with The Good Things Foundation to pilot free mobile data to residents in selected temporary accommodation sites, alongside digital skills support and resources to help households get online.	Accommodations Team Manager, Cost of Living Co-ordinator	March 2024	September 2024	Not Started
42 5.2. Use Data Mapping to look at deprivation in the districts and use this intelligence to pinpoint areas for further targeted communications and early intervention work	Cost of Living Co-ordinator	Started	Ongoing	In Progress
43 5.3. Introduce an Internal referral form between BMSDC and Babergh Citizens Advice to speed up the referral process and to get help quickly to those who need it	Cost of Living Co-ordinator	March 2024	Ongoing	Not Started
44 5.4. Take part in a pilot with Anglian Water to ensure Social Tariffs are more easily accessible	Cost of Living Co-ordinator	April 2024	October 2024	Not Started
45 5.5. Continue with targeted communications campaigns as and when required to ensure residents are kept well informed	Cost of Living Co-ordinator	Started	Ongoing	In Progress
46 5.6. Ensure households are signposted to appropriate low-income tariffs when they move from temporary to permanent accommodation	Accommodations Team Manager	July 2024	October 2024	Not Started
47 5.7. Take part in the development of a Food security plan for Suffolk alongside Community Action Suffolk	Cost of Living Co-ordinator	Started	Ongoing	In Progress

This page is intentionally left blank

# BABERGH & MID SUFFOLK DISTRICT COUNCIL HOMELESSNESS REVIEW: 2023

BABERGH AND MID SUFFOLK DISTRICT COUNCIL HOMELESSNESS REVIEW 2023 .....	6
INTRODUCTION .....	6
RATIONALE AND METHODOLOGY .....	6
SURVEY OF PARTNERS AND STAKEHOLDERS .....	6
LEGISLATION .....	7
➤ Housing Act 1996 (Part 7) .....	7
➤ Homelessness Act 2002 and the Homelessness (Priority Need for Accommodation) (England) Order 2002.....	7
➤ Welfare Reform Act 2012 .....	7
➤ Homelessness Reduction Act 2017 .....	7
➤ Care Act 2014 .....	8
➤ Domestic Abuse Act 2021 .....	8
➤ The Mental Health Act 1983 .....	8
NATIONAL CONTEXT .....	9
➤ Covid-19 Pandemic and Recovery.....	9
➤ Deprivation .....	10
➤ Cost of Living Crisis.....	11
➤ Ending Rough Sleeping for Good .....	12
➤ Homes For Ukraine Scheme.....	13
➤ Afghan and Refugee Asylum Seekers.....	13
➤ Local Context.....	14
➤ Social Housing White Paper .....	15
LOCAL CONTEXT .....	16
➤ Babergh Mid Suffolk District Council Corporate Plan 2019-2023.....	16

➤ BMSDC Joint Homes and Housing Strategy .....	16
➤ Gateway to Home Choice Allocation Policy .....	17
➤ Strategic Housing Market Assessment .....	18
➤ Gypsy, Traveller, Travelling Show People and Boat Dwellers Accommodation Needs Assessment May 2017 .....	18
DISTRICT PROFILES .....	20
➤ Population .....	20
➤ Age Distribution .....	20
➤ Health .....	20
➤ Current Housing Provision .....	21
➤ Average Rents and Local Housing Allowance .....	22
HOMELESSNESS, ROUGH SLEEPING AND TEMPORARY ACCOMMODATION DATA .....	23
➤ Homelessness Assessments and Outcomes .....	23
➤ Tenure of applications .....	23
➤ Reasons for homelessness .....	24
➤ Of those owed an initial prevention or relief duty: .....	26
➤ Reasons for prevention and relief duty ending .....	26
➤ Type of accommodation secured for households at end of Prevention Duty .....	27
➤ Type of accommodation secured for households at end of Relief Duty .....	27
➤ Household size and demand for Temporary Accommodation and Bed & Breakfast Accommodation .....	28
➤ Comparison with regional and national data .....	29
➤ Case Studies and Lived Experience .....	29
EVALUATION OF CURRENT HOMELESSNESS REDUCTION AND ROUGH SLEEPING STRATEGY (2019-2024) .....	30
EVALUATION OF VISION .....	30

- VISION AMBITION 1: To have ended rough sleeping in our districts..... 30
- Survey Results ..... 31
- VISION AMBITION 2: To have proactively worked with clients at an early stage, prior to the 56 days we have too statutorily..... 32
- Survey Results ..... 32
- VISION AMBITION 3: To have significantly reduced the usage of Bed and Breakfast ..... 33
- Survey Results ..... 34
- VISION AMBITION 4: To have successfully prevented homelessness in the private rented sector ..... 35
- Survey Results: ..... 36
- VISION AMBITION 5: Ensured that everyone contacting the service receives in depth advice and assistance on their housing rights and housing options: ..... 37
- Survey Results ..... 38
- EVALUATION OF PRIORITIES: ..... 39
- PRIORITY AREA 1: Prevention of Homelessness ..... 39
- PRIORITY AREA 2: Supporting vulnerable households to secure and maintain accommodation ..... 40
- PRIORITY AREA 3: Mitigating against the impacts of Welfare Reform ..... 41
- PRIORITY AREA 4: Increasing access to suitable accommodation ..... 42
- PRIORITY AREA 5: Raise aspirations of positive health & wellbeing amongst homeless people ..... 43
- PRIORITY AREA 6: End Rough Sleeping ..... 43
- ACHIEVEMENTS IN LIFETIME OF CURRENT STRATEGY (2019-2024)..... 45
- STAKEHOLDER AND PARTNER ENGAGEMENT ..... 49
- Question 1..... 49
- Questions 2-6..... 49
- Question 7..... 50

- Question 8..... 50
- Question 9..... 51
- Question 10..... 51
- Question 11..... 52
- Question 12..... 52
- OTHER INITIATIVES & ACTIVITIES SUPPORTED BY MSDC WHICH CONTRIBUTE TO PREVENTING HOMELESSNESS..... 53
  - BEAM..... 53
  - Rough Sleeper Initiative ..... 53
  - Rough Sleeper Accommodation Programme Initiative ..... 53
  - Homelessness Prevention Fund 2023-2025..... 53
  - Domestic Abuse Link Worker and Domestic Abuse Burdens Funding..... 53
  - Domestic Abuse Link Worker ..... 53
  - Babergh and Mid Suffolk Citizens Advice Services ..... 54
  - Empty Homes Project ..... 54
  - Collaborative working and pathways for vulnerable cohorts..... 54
- REVIEW FINDINGS..... 55
  - Summary ..... 55
  - Major Issues ..... 55
  - Gaps in Provision..... 55
  - Emerging Vision, Themes & Priorities for Next Strategy ..... 56
  - Ambitions for Next Strategy..... 56
  - Housing First ..... 56
  - The Domestic Abuse Housing Alliance ..... 57



- Early Intervention ..... 58
- Strategic Review of Temporary Accommodation ..... 58
- . Next Steps ..... 58

# BABERGH AND MID SUFFOLK DISTRICT COUNCIL HOMELESSNESS REVIEW 2023

## INTRODUCTION

Section 1(1) of the Homelessness Act 2002 gives housing authorities the power to carry out a homelessness review for their district and formulate and publish a homelessness strategy based on the results of the review. The purpose of the review is to:

- Establish the Extent of Homelessness
- Assess its likely extent in the future
- Identify what is currently being done and by who
- Identify what level of resources are available to prevent and tackle homelessness
- Inform future homelessness services and to develop and deliver services in partnership with the aim of preventing and managing homelessness

## RATIONALE AND METHODOLOGY

- This Homelessness Review will form the basis to produce a new Strategy
- This Homelessness Review will demonstrate the major issues and identify gaps in provision
- A New Homelessness Strategy will build upon these and set out plans to tackle homelessness over the next five years

## SURVEY OF PARTNERS AND STAKEHOLDERS

- A survey was sent to Partners and Stakeholders to capture their reflections on the current strategy and to ensure that their views feed into the development of the next strategy.
- The Survey consisted of 11 questions (plus 1 question about the organisation they are representing). The survey was sent, in April 2023 to 30 Stakeholders and Partners.
- The Survey had 9 respondents, which equates to a response rate of 30%.
- Responses were received from Citizens Advice, Suffolk County Council, National Probation Service, Norfolk and Suffolk Foundation Trust, Turning Point, Financial Inclusion and Advice Service, Solo Housing and The Stone Foundation.
- The results of the survey are used and highlighted throughout this Homelessness Review to add insight and perception.

## LEGISLATION

This is the legal framework, which we must follow to meet our statutory obligations to those who are homeless or at risk of becoming so:

➤ [Housing Act 1996 \(Part 7\)](#)

The Housing Act 1996 came into effect 20 January 1997. Part 7 of the Housing Act 1996 is the overarching piece of legislation that relates to homelessness. The Act has been amended by the Homelessness Act 2002, the Localism Act 2011 and more recently by the Homelessness Reduction Act 2017.

➤ [Homelessness Act 2002 and the Homelessness \(Priority Need for Accommodation\) \(England\) Order 2002](#)

The Homelessness Act 2002 introduced the following amendments to Part 7 of the Housing Act 1996:

- Changes to appeals against the suitability of accommodation
- Exclusion from eligibility for assistance of anyone refused housing benefit on eligibility (immigration) grounds
- Provisions relating to Allocations
- Right of Appeal against the refusal by the Local Authority to provide accommodation pending an appeal to the County Court on the homelessness decision
- Cooperation between a local housing authority and a social services authority
- Late appeals to the County Court

It introduced powers for a Local Authority to end the main housing duty, owed to applicants where a homeless duty had been accepted, by arrangement of a suitable offer of accommodation through the private rented sector.

➤ [Welfare Reform Act 2012](#)

The Welfare Reform Act 2012 came into effect 1 April 2013. Amongst the provisions of the Act are the introduction of Universal Credit and Personal Independence Payments, the benefit cap, under-occupation reduction in entitlement and changes to the 'Social Fund' now known as Local Welfare Assistance.

➤ [Homelessness Reduction Act 2017](#)

The Homelessness Reduction Act 2017 amended the period from which a person can be at risk of homelessness from 28 days to 56 days. This meant that housing authorities must work with people to prevent homelessness at an earlier stage. This is known as the extended prevention duty. The Act aimed to reduce homelessness by improving the quality of the advice available and refocusing local authorities on prevention work and increasing support for single people.

➤ Care Act 2014

The Care Act 2014 is the law that sets out how adult social care in England should be provided. It requires local authorities to make sure that people who live in their areas: receive services that prevent their care needs from becoming more serious or delay the impact of their needs. The Care Act prescribes those local authorities must promote wellbeing when carrying out their care and / or support functions when working with clients. One of the areas, which the Act details is the suitability of living accommodation. The Care Act set a strong expectation that agencies would work together to protect children, young adults and people with care and support needs.

➤ Domestic Abuse Act 2021

The Domestic Abuse Act 2021 provided a new statutory definition of Domestic Abuse (to replace the term 'Domestic Violence'). The definition is broader than only physical violence; it also includes sexual abuse, violent or threatening behaviour, psychological or emotional abuse, coercive or controlling behaviour and economic or financial abuse. Domestic abuse can consist of a single incident or a course of conduct over time. It can include behaviour directed at another individual, for example someone's child.

The Domestic Abuse Act 2021 changed the homelessness legislation to give automatic priority need to survivors of domestic abuse. The Domestic Abuse Act 2021 imposes a duty on upper tier local authorities to provide support in safe accommodation.

➤ The Mental Health Act 1983

The Mental Health Act (1983) is the main piece of legislation that covers the assessment, treatment, and rights of people with a mental health disorder. Where a person 'ceases to be detained' under the Mental Health Act 1983, they are eligible for aftercare services, including housing.

## NATIONAL CONTEXT

The following sets out the national situation and policy landscape which shapes and affects housing within Babergh and Mid Suffolk.

### ➤ Covid-19 Pandemic and Recovery

On 11<sup>th</sup> March 2020, a Coronavirus pandemic, referred to as Covid-19, was declared by the World Health Organisation. On 26 March 2020, the UK Government announced a wave of measures to try and reduce the spread of the virus and asked local authorities in England to “help make sure we get everyone in”, including those who would not normally be entitled to assistance under homelessness legislation and included an eviction ban for those households in rent arrears during the summer of 2020.

In response, Babergh and Mid Suffolk Councils sought to ensure that people sleeping rough and in accommodation where it was difficult to self-isolate (such as shelters and assessment centres) were safely accommodated to protect them, and the wider public, from the risks of Covid-19. This was an enormous challenge for two rural districts like ours however our team of Rough Sleeper Outreach Workers and a Team Navigator accommodated several individuals who had been entrenched rough sleepers, people who have regularly slept rough over the past two years, and those who were well known to homelessness services but had previously refused accommodation. Our housing solutions team played a vital role in supporting residents and championing innovative practices, despite the additional pressures they faced due to COVID-19 including block-booking hotel rooms, securing other self-contained accommodation, and working with partner agencies to ensure that those accommodated had the food, medical care and support they required.

During the Covid 19 recovery period and following the lifting of the ban in October 2021 we have seen an increase in households presenting as homeless and our temporary accommodation provision has been at full capacity with the use of bed and breakfast provision increasing.

During the first national lockdown, the Housing Solutions Team:

- handled over **3000 calls**
- located emergency accommodation for **140 households**
- accommodated over **95 households** in temporary accommodation
- completed **16 Minor Adaptations Grants applications** for those needing urgent adaptations to make their home safe and prevent hospital admission or enable hospital discharge
- sourced **150 food parcels** for families or individuals in need

- received **53 rough sleeper referrals** and through the development of a Safe Systems of Work, continued to carry out rough sleeper outreach work throughout the lockdown
- provided meals to the homeless in accommodation who were unable to prepare food, to reduce the need for them to go out and find food
- continued to successfully prevent and relieve homelessness, despite the pandemic. Managing to **end homelessness in 124 cases**, including housing 34 into the private rented sector
- rehoused **60 households** via Direct Let through the Housing Register
- helped **20 households** into the private rented sector
- prevented **over 60 cases** of individuals or families becoming (or ending) homelessness
- set up **three temporary accommodation sites** – transforming one property, The Lees, to house 8 individuals, in just five working days.
- sourced furniture and white goods for clients needing to furnish their new homes – while the shops were shut.
- Led on a county wide initiative which included sourcing over **800** potential hotel rooms to support hospital discharge, key workers needing to self-isolate and housing homeless persons.

#### ➤ Deprivation

The Index of Multiple Deprivation (IMD) is produced by the Government to rank nearly 33,000 neighbourhoods across England in terms of their relative deprivation. Deprivation is measured based on 39 separate indicators, organised across seven domains:

- Income
- Employment
- Health & Disability
- Education, skills and training
- Crime
- Barriers to Housing & Services
- Living Environment

The IMD ranks all neighbourhoods in England based on scores calculated for each of these domains, from the most deprived (rank 1) to the least deprived (rank 32,844). In addition, an 'overall' deprivation ranking is also calculated based on a single score from all the domains.

Overall, Suffolk is not among England's most deprived local authorities. In the 2019 IMD, Suffolk was ranked 99th out of 151 upper-tier local authorities (where 1 is most deprived and 151 is least deprived). This means that, overall, Suffolk is among the 40% least deprived upper-tier local authorities in England: 60% of English upper-tier local authorities are more deprived than Suffolk. Suffolk's most deprived neighbourhoods are concentrated in Ipswich. Ipswich has a much higher concentration of deprived neighbourhoods (33%) than found in England generally. This is to be expected insofar as, across England, deprivation is concentrated in cities and large towns. All districts within Suffolk have experienced more decline than improvement since the 2007 IMD. Babergh and Mid Suffolk (and West Suffolk), who had the least deprivation in the 2007 IMD— have seen the steepest net declines.

Both Babergh and Mid Suffolk are classified as predominantly rural areas. Although deprivation levels are low compared with national levels, across Suffolk 28% of those identified as income deprived live in rural areas. Living in a very rural area is widely considered to cost households on average about 20% more than a similar household living in an urban area.

Existing pockets of deprivation within the districts will be exacerbated by the current Cost of Living Crisis.

#### ➤ Cost of Living Crisis

A cost-of-living crisis refers to a scenario in which the cost of everyday essentials like energy and food is rising much faster than average household incomes. A wide variety of factors, including the war in Ukraine, market volatility, costs associated with supply chains and inflation rates, have converged and resulted in a cost-of-living crisis in the UK. The rising costs of fuel, food and other essentials are combining with existing disadvantage and vulnerability within our communities to put many households at greater risk of both immediate hardship and reduced opportunity and wellbeing. This will impact on some people and communities more than others and many households face stark financial challenges with increasing food and energy bills.

In May 2022 Babergh and Mid Suffolk District Councils launched a five-point action plan to support residents through the cost-of-living crisis, focusing on:

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. Maximising 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.



4. Maintaining 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

The Cost-of-Living Crisis Action Plan brings together a suite of measures that focus on maximising income, accessing advice, food insecurity and poverty, fuel poverty and Health and Wellbeing. The Action Plan is reviewed regularly as there are many unknowns and potential challenges ahead that cannot be fully predicted, such as global challenges, market volatility, rising inflation and the everyday changing landscape regarding people’s household budgets. In the past year Housing Services have assisted with:

	1 April 2022 – 31 March 2023
Food Bank Parcels awarded:	286
Fuel Vouchers awarded:	31
Furniture/ White Goods acquired:	68
Funds secured from Charities:	£12,064.12
Discretionary Housing Payments Awarded:	30

Babergh and Mid Suffolk Districts Council’s response to the Cost-of-Living Crisis can be found here: [BMSDC Cost of Living Support](#)

➤ Ending Rough Sleeping for Good

‘Ending rough sleeping for good’ is a cross-government strategy setting out how the government and its partners plan to work together to deliver on the government’s manifesto commitment to end rough sleeping in this Parliament. It also lays the foundations for long-term system change to end rough sleeping sustainably and for good. It was published in September 2022 and can be found here: [Ending Rough Sleeping for Good](#)

The ‘end goal’ of the Strategy is for ‘rough sleeping to be prevented wherever possible but when it does occur it should be rare, brief and non-recurring.’ The Strategy focuses on better prevention, swift and effective intervention, extra help to aid recovery and a more transparent and joined up system

The strategy admits that to meet the goal of ending rough sleeping for good, a step change would be needed, and sets out the following measures to achieve the step change:

- Defining what ending rough sleeping means and a new data-led framework to measure it
- A new 'Prevention First' approach
- A new £200m Single Homelessness Accommodation Programme

➤ Homes For Ukraine Scheme

On 14<sup>th</sup> March 2022 following the invasion of Ukraine, the Secretary of State for Levelling Up, Housing and Communities, launched Phase one of the Homes for Ukrainians Scheme.

*"The Homes for Ukraine scheme will allow individuals, charities, community groups and businesses in the UK to bring Ukrainians to safety – including those with no family ties to the UK." - Michael Gove*

Phase One of the scheme allowed sponsors in the UK to nominate a named Ukrainian or a named Ukrainian family to stay with them in their home or in a separate property.

- Councils had a statutory duty to ensure that all prospective sponsors were subject to accommodation and safeguarding checks. These checks were conducted after the council had been alerted that a visa application had been made. The Private Sector Housing Team made at least one in-person visit either before or shortly after a guest moved into a property, to confirm that the accommodation was suitable and that the guests were well and that there was no serious safeguarding, or welfare concerns.
- There were some cases where the sponsor/guest relationship broke down quickly and the guest was at risk of homelessness. In these cases, our Councils' statutory homelessness duties applied, while we worked with the Suffolk Refugee Service to rematch guests to new hosts or assisted them to find accommodation in the private rented sector.
- In Babergh (as of 31<sup>st</sup> March 2023), 14 Ukrainian households presented as homeless or as threatened with homelessness. Of those 14 households, 10 were owed an initial prevention or relief duty under the legislation. 9 of these households were sourced alternative accommodation, 8 within the private-sector, and 1 moved to live with family outside of the district.
- In Mid Suffolk (as of 31<sup>st</sup> March 2023), 16 Ukrainian households presented as homeless or as threatened with homelessness. Of those 16 households, 9 were owed an initial prevention or relief duty under the legislation. 4 of these households were sourced alternative accommodation, 3 within the private-sector and 1 offered a Council tenancy in a sheltered scheme. An additional 3 households were sourced alternative accommodation with a new host.

➤ Afghan and Refugee Asylum Seekers

The UK formally opened the Afghan Citizens Resettlement Scheme (ACRS) on 6<sup>th</sup> January 2022: [Afghan citizens resettlement scheme - GOV.UK \(www.gov.uk\)](https://www.gov.uk/afghan-citizens-resettlement-scheme)

The scheme prioritises:

- those who have assisted the UK efforts in Afghanistan and stood up for values such as democracy, women’s rights, freedom of speech, and rule of law
- vulnerable people, including women and girls at risk, and members of minority groups at risk (including ethnic and religious minorities and LGBT+)

The Government aims to resettle more than 5,000 people in the first year and up to 20,000 over the coming years.

This is in addition to the [Afghan Relocations and Assistance Policy \(ARAP\) scheme](#), which has already settled thousands of Afghans who have worked with the UK government, and their families. The ARAP scheme is a separate scheme to the ACRS and offers Afghan nationals who have worked for or alongside the UK government, and meet the ARAP criteria, relocation to the UK.

#### ➤ Local Context

In Babergh and Mid Suffolk District Councils we are working in partnership with our Strategic Migration Partnership to deliver a package of support and advice. We have attended several local surgeries within our districts to provide advice on housing options and support with making applications on the housing register.

We currently have one Asylum Seeker accommodation within our districts.

Our Private Sector Housing team have inspected almost 200 properties in support of Homes for Ukraine.

The table below shows number of Homes for Ukraine households in our districts.

Homes for Ukraine	Suffolk	Babergh	Mid Suffolk
<b>Properties where guests have arrived</b>	428	82	106
<b>Guests have arrived</b>	1006	154	193
<b>Properties offered</b>	590	86	121
<b>Guests have applied for visas</b>	1402	207	258

We have also been successful in our bid for the Local Authority Housing Fund and secured funding to deliver 10 properties in Babergh, 9 for Homes for Ukraine and 1 for the Afghan resettlement scheme. In Mid Suffolk it is to deliver 12 properties, 11 for Homes for Ukraine and 1 for the Afghan resettlement to support with additional housing demand.

We have been working collaboratively in the other districts, sharing good practice and ensuring that the approach is consistent, when offering housing assistance.

➤ [Social Housing White Paper](#)

The Social Housing White Paper was published by the Ministry of Housing Communities and Local Government on 17 November 2020. It sets out seven commitments that social housing residents should be able to expect from their landlord. It collates a range of different initiatives and legislative changes from across the housing landscape, building on proposals set out in the Social Housing Green Paper and the Review of Social Housing Regulation: Call for Evidence. The overarching themes are building and resident safety, and resident voice. It also aims to deliver the improvements in transparency and accountability promised in the 2018 green paper.

In 2022 The Social Housing Regulation Bill was laid in parliament to deliver the reforms outlined in the Social Housing White Paper and address the concerns raised following the tragic fire at Grenfell Tower in 2017. The Bill will bring forward a stronger and more proactive regulatory regime to drive up standards in the sector and hold landlords to account for the service they provide to their tenants.

## LOCAL CONTEXT

The following sets out the local situation and policy landscape that shapes and affects housing within Babergh and Mid Suffolk.

➤ [Babergh Mid Suffolk District Council Corporate Plan 2019-2023](#)

The Corporate Plan is designed to address the challenges and seize the opportunities facing the districts, and partner organisations, for the foreseeable future. Housing (along with Environment, Economy, Wellbeing, Customers and Community) is a Strategic Priority of the Corporate Plan.

The Vision of the Corporate Plan is to build "Great communities with bright and healthy futures that everyone is proud to call home".

The Mission of the Corporate Plan is to "Provide strong, proud and inspirational leadership; striving for excellence, and together building great communities for everyone to live, work, visit and invest in".

The Corporate Plan is due to be refreshed in the coming year.

➤ [BMSDC Joint Homes and Housing Strategy](#)

In March 2019, both Councils adopted the Homes and Housing Strategy 2019 -2024. In October 2022, the Homes and Housing Strategy was refreshed to ensure it remains up to date. The Homes and Housing Strategy Delivery Plan has been refocused and it now contains actions on the new priorities that have emerged since the original strategy and delivery plan was written in 2019.

The Joint Homes and Housing Strategy has nine strategic aims:

- The housing market functions effectively, providing homes which are as affordable as possible; to meet the needs of residents and support the local economy.
- There is a wide and varied choice of good quality, sustainable homes of different sizes, types, and tenures, to meet the needs of a wide range of different households.
- Homelessness is prevented and our services provide positive and planned interventions.
- Babergh and Mid Suffolk is an effective social landlord known for delivering quality services.
- Homes are in high quality, sustainable environments, served by jobs and community facilities, appropriate green spaces, effective transport links and other necessary infrastructure.
- Best use is made of private sector land and private accommodation across the districts.
- People live in vibrant and well-connected communities; and homes and communities continue to meet the changing needs of residents.
- Everyone has a suitable home, and residents can live as healthily, safely, and independently as possible within sustainable communities.
- Both councils have strong relationships with residents, developers and other partners that enable us to deliver housing, infrastructure, and services effectively, and to innovate where appropriate.

The Joint Homes and Housing Strategy commits the councils to:

- Working with anyone that wants to develop and deliver the right homes, in the right place at the right time to provide much needed new homes
- Making more effective use of existing homes
- Developing innovative solutions to the housing needs of our residents and communities.
- Creating a new relationship with residents which is based around their need and experience, rather than the processes of individual agencies.
- Adopting a 'one public sector' approach, working together in a more linked up way with our public sector partners to deliver better, more effective, and efficient services.
- Being open and transparent, providing frequent information as to how we are performing against the plans. This will ensure residents have the information at their fingertips to engage with us and ensure we deliver on our priorities.

The Joint Homes and Housing Strategy Delivery Plan is monitored on a quarterly basis, with a quarterly update and overview provided to the Housing Programme Board. The Housing Programme oversees all the projects that are in progress within the Housing Service. Strategic Property also report their projects into the Housing board. The board meets monthly to look at any projects that are 'At Risk' or 'Off-track' and to help steer projects back or support projects with ideas and guidance as well as deciding on priorities for the upcoming month. The board also looks at risk management at a Programme level and tracks benefits from projects that have been completed to monitor whether they have delivered the benefits they were set out to.. The Housing Programme also works with the other corporate boards to better plan projects and resources, for example forward planning where IT resource is required.

The Strategy and Delivery Plan are also reviewed on an annual basis by the Joint Overview and Scrutiny Committee.

The Joint Homes and Housing Strategy can be found here: [Joint Homes and Housing Strategy 2022](#)

➤ [Gateway to Home Choice Allocation Policy](#)

Gateway to Homechoice is a choice-based lettings system, where social housing properties are advertised in the Local Authority areas of Babergh, Braintree, Colchester, East Suffolk, Ipswich, Maldon, and Mid Suffolk. The scheme allows one point of access for customers to apply to a Local Authority housing register and be considered for available properties in any of the areas.

The scheme aims to provide a consistent approach to accessing housing across the diverse area of operation and where possible, to ensure that applicants have choice over where they live.

The Key Objectives of the Choice Based Lettings (CBL) Scheme are:

- To maintain a system that customers can understand, and which is open, fair, user-friendly and offers a high level of operational consistency across the Gateway area of operation
- To facilitate genuine opportunities for mobility across the Gateway area of operation
- To meet the legal requirements for the allocation of housing as set out in the Housing Act 1996 Part VI as amended by the Homeless Act (2002), the Localism Act 2011 and the Homelessness Reduction Act 2017 (HRA 2017).

The Gateway to Home Choice Allocation Policy can be found here: [Allocations Policy - July 2022 - HomeChoice \(gatewaytohomechoice.org.uk\)](https://gatewaytohomechoice.org.uk/allocations-policy-july-2022)

#### ➤ Strategic Housing Market Assessment

Ipswich Borough Council, Babergh and Mid Suffolk District Councils and Suffolk Coastal District Council and Waveney District Council (Now East Suffolk Council) jointly commissioned Peter Brett Associates to undertake a Strategic Housing Market Assessment (SHMA) in September 2016. The objective of the SHMA was to test and confirm the housing market geography and to produce conclusions on objectively assessed housing need.

The Ipswich and Waveney Area Strategic Housing Market Assessment was published in May 2017 and can be found here: [Strategic Housing Market Assessment \(SHMA\) » Babergh Mid Suffolk](#)

Volume 1 of the SHMA is in three parts. Part A provides the introduction and policy context and goes on to analyse the market geography of the study area. The analysis found that the area contains two housing market areas (HMAs), the Ipswich HMA and the Waveney HMA. Part B of the report provides the objectively assessed housing need calculation for the Ipswich HMA and part C for the Waveney HMA. Volume 2 deals with housing mix and tenure and affordable housing need

The Ipswich and Waveney Area Strategic Housing Market Assessment 2017 (with a partial update in 2019) indicated a need for at least 110 affordable homes per year in Babergh and the requirement for new affordable homes per year across Mid Suffolk is at least 127.

#### ➤ Gypsy, Traveller, Travelling Show People and Boat Dwellers Accommodation Needs Assessment May 2017

In 2017, Babergh and Mid Suffolk District Councils - working in conjunction with Ipswich Borough Council, and Suffolk Coastal and Waveney District Councils (now East Suffolk Council) - commissioned RRR Consultancy to deliver an "Accommodation Needs Assessment" for Gypsies, Travellers, Travelling Show people and Boat Dwellers in relevant parts of Suffolk.

This updated the previously published Gypsy, Traveller & Travelling Show people Accommodation Assessment (Oct 2013), and before that, the Suffolk Cross-Boundary GTAA (2007), both of which had been commissioned by the same five local authorities.



The 2017 Accommodation Needs Assessment showed:

Local Authority Need: Gypsy and Traveller Pitches: Twenty Year Summary: 2016-2036							
	Base Numbers 2016	Additional Need 2016-2021	Additional Need 2021-2026	Additional Need 2026-2031	Additional Need 2031-2036	Additional Need 2016-2036	Numbers as at 2036
Babergh	1	0	0	0	1	1	2
Mid Suffolk	62 (41)	-5(16)	4	5	5	9 (30)	74

The figures in brackets in the table above are based on a possible scenario of 21 pitches not being available. A site in Mid Suffolk is believed to have been sold. It includes 16 vacant and 5 occupied pitches at the time of the survey. It is possible that the site might not be available to Gypsies and Travellers and therefore may be removed from the supply and added to need. The other vacant pitches are likely to be occupied within the next five years, so continue to be included in the supply.

There is an ongoing project supported by all the Local Authorities in Suffolk, to identify three sites throughout Suffolk to accommodate Gypsies and Travellers on a Short-term basis. The sites being sought are referred to as Short Term Transit Sites (STTS) and are designed to be used as temporary accommodation for 2-3 weeks, with a maximum stay of 3 months.

An action within the Joint Homes and Housing Strategy Delivery Plan commits the Councils to working with partners across Suffolk to deliver suitable pitches for Gypsies and Travellers to meet identified needs.

Gypsy, Traveller, Travelling Show People and Boat Dwellers Accommodation Needs Assessment May 2017 can be found here: [Gypsy, Traveller, Travelling Show People & Boat Dwellers ANA May 2017](#)

## DISTRICT PROFILES

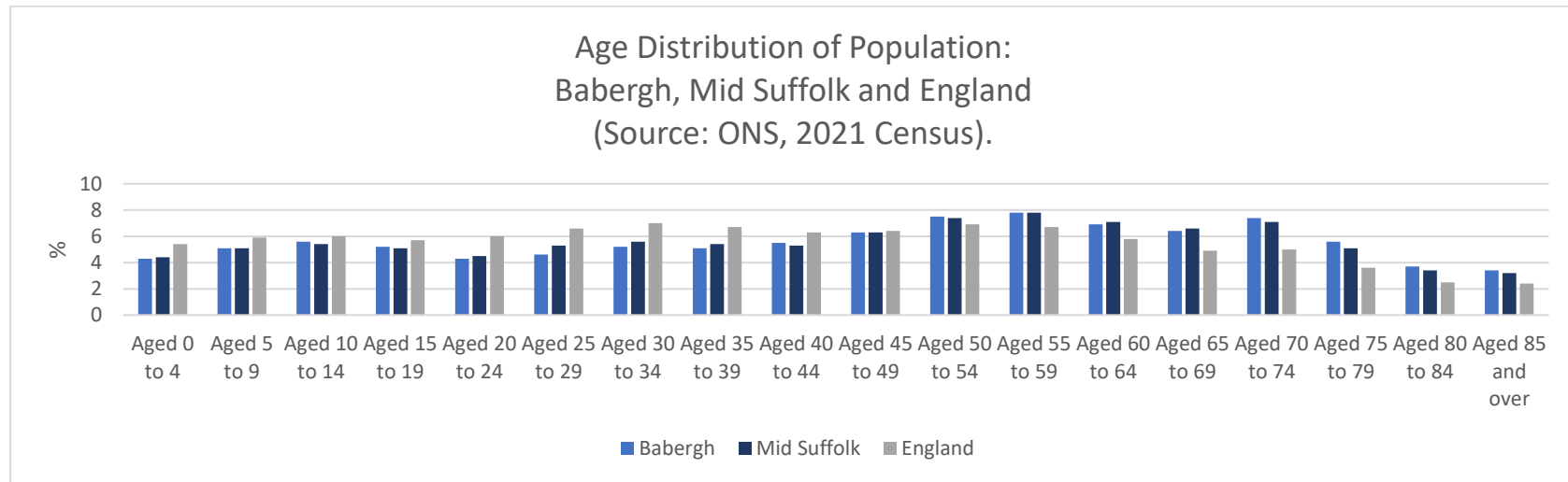
### ➤ Population

Babergh District Council and Mid Suffolk District Council are predominantly rural districts covering the centre of Suffolk, running from the boundary with Essex in the south to the border with Norfolk in the north.

The 2021 Census showed the population of Babergh to be 92,300 and the population of Mid Suffolk to be 102,700. The Office for National Statistics, in its 2018-based Subnational Population Projections, forecasts that Babergh's population will increase by over 10% by 2043 to 101,923 and forecasts Mid Suffolk's population to increase by almost 13% to 115,846 by 2043.

### ➤ Age Distribution

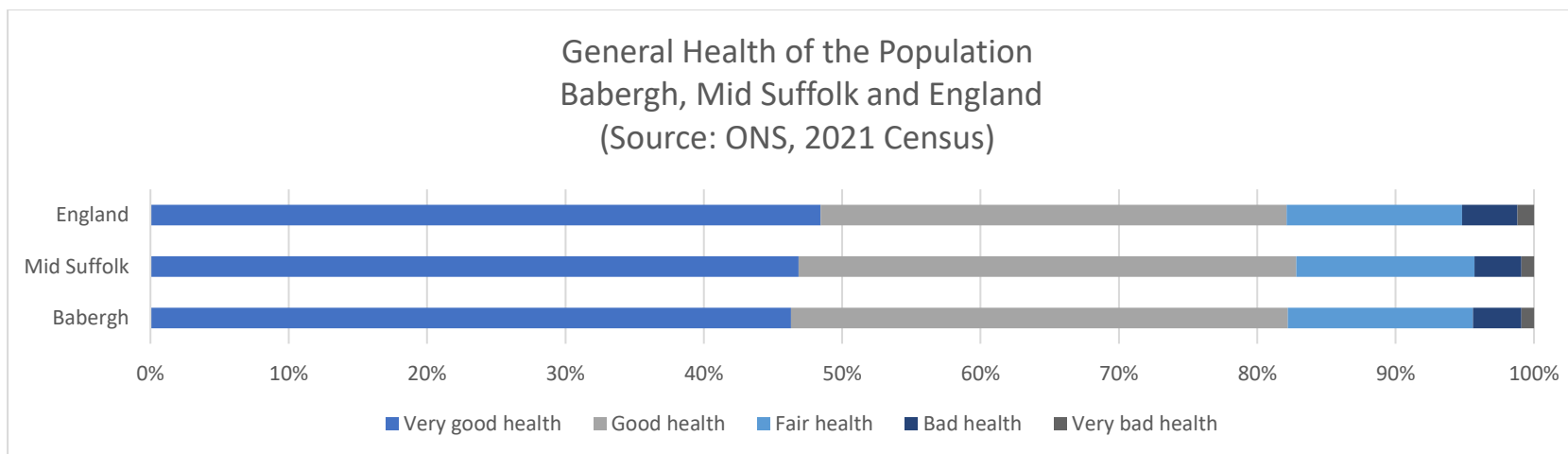
Both Districts have an ageing population and fewer younger people.



### ➤ Health

According to data from the 2021 Census; the general health of the populations in Babergh and Mid Suffolk is very similar to the national picture.

### General Health of the Population Babergh, Mid Suffolk and England (Source: ONS, 2021 Census)



➤ **Current Housing Provision**

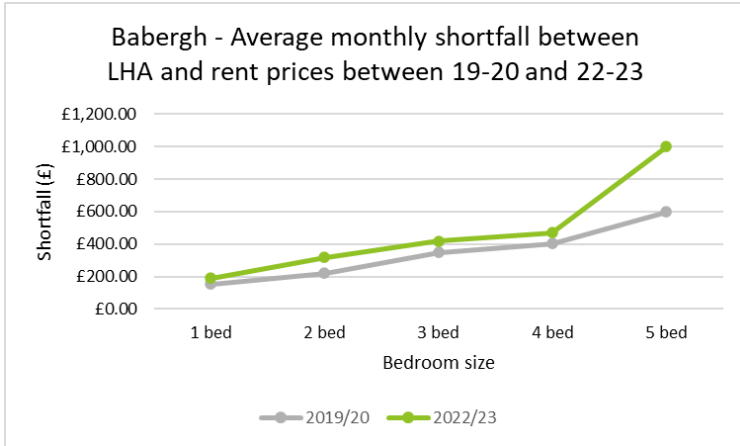
Both Babergh and Mid Suffolk have a significantly higher percentage of properties owned-outright (with no mortgage) than Suffolk and England. Both districts have a lower percentage of properties in the Private Rented Sector than both Suffolk and England.

Ownership & Tenancy by Type							
		Babergh		Mid Suffolk		Suffolk %	England %
<b>Owned:</b>	Owns Outright	17,460	43.4%	19,151	43.2%	38.6%	32.5%
	Owns with mortgage or loan	11,098	27.6%	13,607	30.7%	26.7%	28.8%
<b>Shared Ownership:</b>	Shared Ownership	289	0.7%	446	1%	0.7%	1%
<b>Social Rented:</b>	Rents from Council or LA	3,370	8.4%	3,141	7.1%	6.9%	8.3%
	Other Social Rented	1,963	4.9%	1,870	4.2%	8%	8.8%
<b>Private Rented:</b>	Private Landlord or Letting Agency	4,910	12.2%	4,874	11%	16.3%	18.2%
	Other Private Rented	1,049	2.6%	1,205	2.7%	2.5%	2.2%
<b>Lives Rent Free:</b>	Lives Rent Free	61	0.2%	50	0.1%	0.1%	0.1%
	<b>TOTAL:</b>						

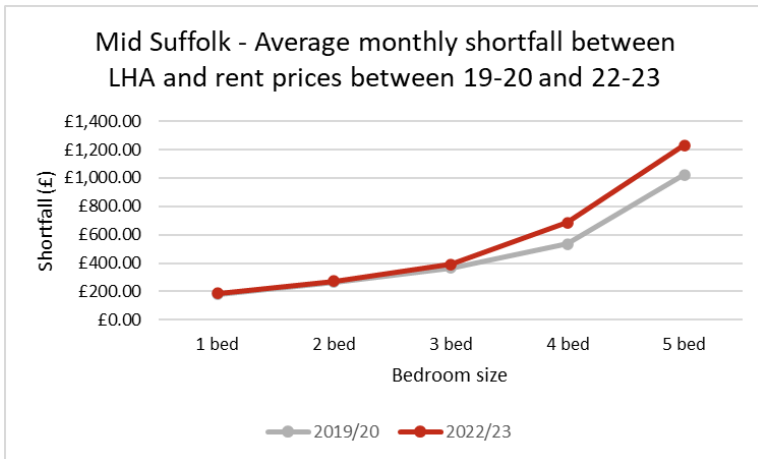
Data Source: Office for National Statistics, via SODA. 2021

➤ Average Rents and Local Housing Allowance

Babergh and Mid Suffolk market rents have increased year on year with the gap between Local Housing Allowance (LHA) and market rents often with over £300 per month difference.



In Babergh, the average monthly shortfall between LHA and market rent prices between 19-20 and 22-23 have risen for all bedroom sizes, particularly for larger sized properties. The graph shows the widening gap in Babergh between the Bury St Edmunds LHA rate, and the market rent prices over a three-year period.



In Mid Suffolk, the average monthly shortfall between LHA and market rent prices between 19-20 and 22-23 has risen for larger sized properties. The graph shows the widening gap in Mid Suffolk between the Ipswich LHA rate, and the market rent prices over a three-year period.

## HOMELESSNESS, ROUGH SLEEPING AND TEMPORARY ACCOMMODATION DATA

### ➤ Homelessness Assessments and Outcomes

Applications, Duties and Outcomes (2019 – 23)	Babergh	Mid Suffolk	Combined
Applications taken	2396	2176	4572
Owed an initial prevention or relief duty	1321	1162	2483
Successfully prevented from becoming homeless	579	542	1121
Successful relieved from homelessness	164	190	354
Main Duty accepted at main duty stage	226	178	404
Found to be in non-priority at main duty stage	57	35	92
Found to be intentionally homeless at main duty stage	20	12	32
Main Duty discharged	206	160	366
Ineligible	2	8	10

### ➤ Tenure of applications

The top five tenures of applications taken, across both Districts, for period 1<sup>st</sup> April 2019 – 31<sup>st</sup> March 2023 were:

Accommodation at time of application	2019-20	2020-21	2021-22	2022-23	% Increase (19- 23)
Living with family	147	231	163	247	68%
Private rented sector: self-contained	148	118	178	206	39%
Council tenant	216	64	83	95	-56%
Living with friends	77	94	50	77	No change
Registered Provider tenant	55	21	27	38	-31%

In 2022/23 there was a 56% decrease in the number of applications from Council tenants, compared to 2019-20 figures. This may be attributed to the eviction ban in place during COVID-19, as well as a focus on early intervention of those in arrears, supported by the Tenancy Support Team. For the same comparison period as above, 2022-23 saw a 54% decrease in presentations from those living in supported accommodation.

In 2022-23, there was a 42% increase in presentations from those living within the entire private sector (Houses of Multiple Occupation, self-contained accommodation, and lodgings), compared to 2019-20 figures. In particular, the number of those who were living in self-contained accommodation at the time of their application was 39% more than in 2019-20. This may be attributed to the lifting of the eviction ban which took place during COVID, with more landlords serving notice. This figure may also be impacted by the cost-of-living crisis, where landlords have been selling their properties due to rising interest rates and expenses.

There was also a 100% increase in the number of applications from Owner-Occupiers in 2022/23 compared to 2019-20 figures.

➤ **Reasons for homelessness**

The top five reasons for homelessness, across both Districts, for period 1<sup>st</sup> April 2019 – 31<sup>st</sup> March 2023 were:

- 1) End of private rented tenancy - assured shorthold tenancy
- 2) Family no longer willing or able to accommodate
- 3) Relationship with partner ended (non-violent breakdown)
- 4) End of social rented tenancy
- 5) Other

Main reason for loss of settled home	2019-20	2020-21	2021-22	2022-23	% Increase (19- 23)
<b>End of private rented tenancy - assured shorthold tenancy</b>	132	93	160	221	67%
<b>Family no longer willing or able to accommodate</b>	95	153	106	135	42%
<b>Relationship with partner ended (non-violent breakdown)</b>	92	118	63	76	-17%
<b>End of social rented tenancy</b>	120	27	88	101	-16%
<b>Other</b>	88	103	37	0	-100%

In 2022-23, there was a 45% decrease in those presenting to the Council as homeless due to eviction from supported accommodation, compared to 2019-20 figures. This decrease can be attributed to increased collaborative working.

Following on from the reduction of those approaching as homeless from Council tenancies, 2022-23 saw the number of those homeless due to the end of a social housing tenancy fall by 16%, compared to 2019-20 figures.

Presentations in those fleeing domestic abuse rose by 142% over a three-year period (53 presentations in 2019/20 to 128 presentations in 2022/23).

- The rise in homelessness presentations due to domestic abuse can be attributed to the change in homelessness legislation following the introduction of the Domestic Abuse Act 2021 when Local Authorities became able to give those households who are homeless due to domestic abuse priority need for homelessness assistance and accommodation.
- From the Domestic Abuse New Burdens Funding 2021 which followed the new 2021 Act Babergh and Mid Suffolk Councils allocated money towards a new Domestic Abuse Link Worker Post, repurposed, and manage four refuge properties from within our own housing stock and use of a fund to support the financial costs of those suffering domestic abuse.
- The new Domestic Abuse Link Worker role has proved to be invaluable in providing support to individuals and households who have a potential housing need in addition to experiencing domestic abuse and compliments the Housing Solutions Team who are often presented with households who need assistance around housing circumstances due to families fleeing properties and areas due to domestic abuse.
- Our domestic abuse service is a bespoke support service which is tailored to suit the immediate needs of the client in the first instance with a personalised plan moving forward to achieve safe accommodation.
- In the 12 months that our Domestic Abuse Link Worker has been in post they have worked with over 200 individuals supporting them to safe places, referring them to other agencies and publicising the support we can offer.
- Our Domestic Abuse Link Worker has coordinated an organisational response to the Suffolk Domestic Abuse Champions Network who are now entering their fourth year with more than 1200 people across the county trained as champions, Babergh and Mid Suffolk District Councils have had 37 members of staff trained as champions.

There was a 72% increase in those becoming homeless due to the end of a tenancy within the entire private sector. The number of those asked to leave from Assured Shorthold Tenancies (AST), Houses of Multiple Occupation, and Lodgings all rose, however those asked to leave an AST increased the most, reaching a 67% increase compared to 2019-20 figures.

The number of homeless presentations due to a private landlord wishing to sell or relet the property has increased over the last three years. In 2019-20, this figure was 35 applications. In 2022-23, this figure was 60 applications. This is an increase of 71%. There has not been a significant increase in the number of private tenants where rent arrears were the main cause of homelessness.

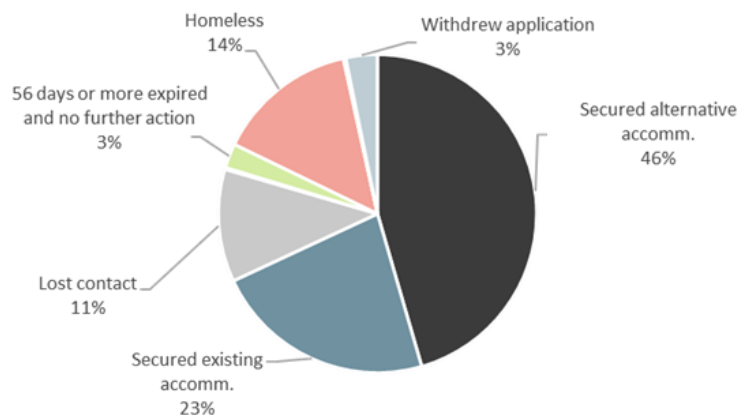
➤ Of those owed an initial prevention or relief duty:

	Babergh 1 <sup>st</sup> April 2019 – 31 <sup>st</sup> March 2023	Mid Suffolk 1 <sup>st</sup> April 2019 – 31 <sup>st</sup> March 2023
Age of Main Applicant: Average	37 years old	40 years old
Most Common age group:	25-34 years old	25 – 34 years old
Ethnicity of main Applicant:	86.75% were White British	91.40% were White British
Nationality of main Applicant:	95.99% were UK Nationals	96.39% were UK Nationals
Gender of Main Applicant:	56.62% were Female 43.22% were Male 0.15% were Transgender	57.14% were Female 42.60% were Male 0.26% were Transgender

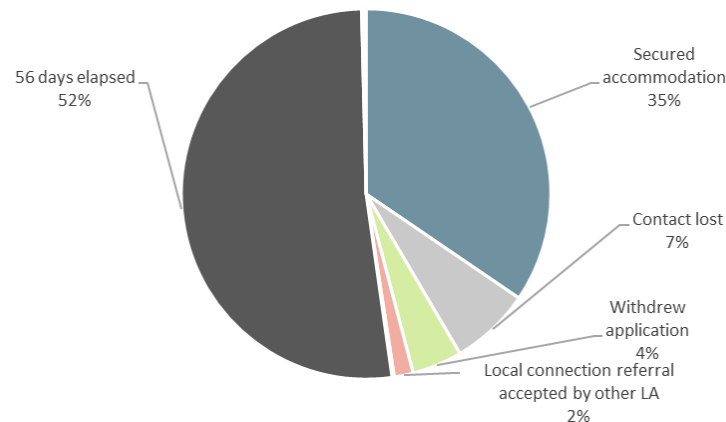
- Reasons for prevention and relief duty ending
- Of those owed a prevention or relief duty, 55% of those duties were discharged via a positive outcome i.e. into accommodation available for at least 6 months
  - 9.75 of those owed a duty lost contact with the Council
  - 3.66% withdrew their applications



**Prevention Duties Discharged (2019-23)**



**Relief Duties Discharged (2019-23)**



➤ Type of accommodation secured for households at end of Prevention Duty

The top five tenures for preventing homelessness, across both Districts, for period 1<sup>st</sup> April 2019 – 31<sup>st</sup> March 2023 were:

- 1) Council tenancy – 39.80%
- 2) Private rented sector: self-contained – 21.55%
- 3) Registered Provider tenancy – 21.37%
- 4) Staying with family – 5.79%
- 5) Social rented supported housing or hostel – 5.25%

Mostly, the percentage of duties discharged per tenure in 2022-23 remains like the levels in 2019-20 figures. There has been an increase in the number of prevention duties discharged via Registered Provider tenancies, this has increased by 125% during the three-year period.

➤ Type of accommodation secured for households at end of Relief Duty

The top five tenures for relieving homelessness, across both Districts, for period 1<sup>st</sup> April 2019 – 31<sup>st</sup> March 2023 were:

- 1) Council tenancy - 42%
- 2) Private rented sector: self-contained - 20.06%
- 3) Registered Provider tenancy - 16.95%

4) Social rented supported housing or hostel - 15.25%

5) Private rented sector: HMO - 7.91%

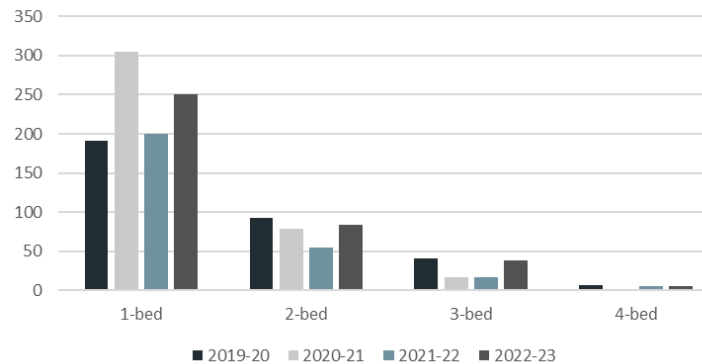
Over the three-year period, the number of relief duties discharged into self-contained accommodation within the private sector rose by 53.6%. This could be attributed to the establishment and expansion of Central Suffolk Lettings. Similarly, there was a large increase in the number of duties discharged via Registered Provider tenancies, with this increasing from 5 per year, to 26 per year in 2022-23.

➤ Household size and demand for Temporary Accommodation and Bed & Breakfast Accommodation

In the last three years, the demand for B&B and temporary accommodation has increased. In 2022-23, the total combined number of placements across both Districts, including moves between B&B and TA, increased by 14%.

- The total combined number of placements peaked in 2020-21 (totalling 401 placements p/year), due to the 'Everyone In' scheme during COVID.
- The number of placements who have a 3-bed need increased last financial year, this is double the figure it was both in 2020-21 and 2021-22. This is most likely due to the increase in the number of presentations from the private sector following the lifting of the eviction ban, and the impact of financial hardship on larger families.
- The number of single households placed into B&B and temporary accommodation has also increased in the most recent years – this figure is now up 31% compared to 2019 levels.

Placements per household size, per year



➤ Comparison with regional and national data

Data is submitted to DLUHC each quarter, as part of the Homelessness Case Level Collection return, which measures local authorities' actions under statutory homelessness legislation. BMSDC data can be compared regionally and nationally using the data published by DLUHC, which is publicly available here: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness>

➤ Case Studies and Lived Experience

Journeys through homelessness and rough sleeping and individual, personal testimonials can be found in Appendix - **Number**

## EVALUATION OF CURRENT HOMELESSNESS REDUCTION AND ROUGH SLEEPING STRATEGY (2019-2024)

### EVALUATION OF VISION

The Vision of the current strategy posed the question – where will we be in 2024? The Vision then proceeds to state 5 bold ambitions to be achieved within the lifetime of the strategy. These ambitions (plus narrative and statistics to quantify if they have been achieved or not) are:

➤ VISION AMBITION 1: To have ended rough sleeping in our districts

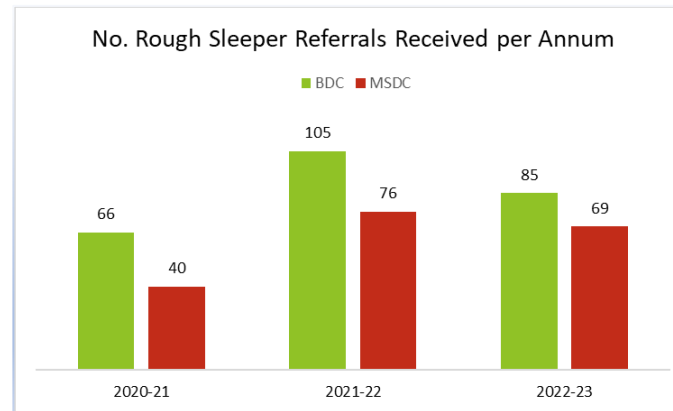
Babergh and Mid Suffolk Councils take a No Second Night Out approach to tackling rough sleeping and have built upon previous strategies to tackle rough sleeping alongside the Rough Sleeper Initiative 2022-25.

There are relatively low numbers of rough sleepers across our districts and the Rough Sleeper Team will verify and act upon information received as soon as possible, working with partner organisations, and using resources to provide:

- An immediate place of safety for rough sleepers to stay
- An assessment of their needs
- Access to other services such as healthcare and support

Babergh and Mid Suffolk, along with all Local Authorities in England, take a ‘single night snapshot’ of people sleeping rough in the Autumn of every year. We use a count-based estimate of visible rough sleeping. Our snapshot is collated by rough sleeper outreach workers and volunteers within the organisation and is independently verified by Homeless Link. Annual Rough Sleeper count figures show:

	Babergh	Mid Suffolk
Autumn 2019	2	2
Autumn 2020	6	1
Autumn 2021	4	1
Autumn 2022	5	2



In 2020-21 the figures were lower than the annual average due to the 'Everyone In' government initiative during the COVID 19 pandemic when local authorities accommodated rough sleepers regardless of 'priority need' under homelessness legislation.

In 2021-22 The 'Everyone In' initiative ended, and the eviction ban was lifted resulting in more people presenting as homeless and more individuals turning to rough sleeping.

The service received more referrals from members of the public via StreetLink resulting in several referrals for one person possibly due to a higher awareness following the Council social media campaigns on how to report a rough sleeper.

The public were more aware of rough sleeping following a period of reduced rough sleeping.

The Socio-economic impact of COVID has changed how rough sleeping is viewed in communities; previously a rough sleeper in society was identified in a negative way, as being culpable for their own situation. However, following the pandemic and the financial impact on households including unfavourable housing and labour market conditions, reduced welfare and benefits coupled with rising levels of poverty, society could be perceived as viewing rough sleepers in a more sympathetic way.

#### ➤ Survey Results

Survey respondents were asked about their perception of progress towards the 5 ambitions set out in the Vision of the Current Homelessness Reduction and Rough Sleeping Strategy:

Vision Ambition:	Achieved this ambition:	Significant Progress made:	Progress Made:	No Progress made:	Situation Worse:	No knowledge:
To have ended Rough Sleeping in our districts	0%	11.1%	44.4%	0%	0%	44.4%

Respondents were also asked to comment on why/why not this ambition has/has not been achieved:

*The current situation nationally (the housing crisis, the cost-of-living crisis, the growing gaps in the social security system, the shortage of mental health services and the limited availability of services to help people with addictions) is not conducive to ending rough sleeping. The short-term response to Covid-19 ("Everyone In") shows what can be done with the right level of support and action from central Government. Because of this, the aim is laudable but not necessarily achievable unless things change nationally.*

*We are not seeing any increases in clients who are 'rough sleeping'. However, we are seeing an increase in the number of clients who have no home but are sofa surfing.*

*Our perception is that BMSDC are helpful, proactive, and pragmatic in their approach to resolve homelessness/rough sleeping.*

In Conclusion, following our successful bid in 2022 for the Rough Sleeper Initiative funding we consider that we have ended repeated rough sleeping in our districts by rapid intervention for those individuals who are new to rough sleeping and by prevention methods for those that are at risk of rough sleeping. However, many long-term rough sleepers have high levels of complex needs including mental health problems, drug and alcohol dependencies, and institutional experiences which needs a more tailored approach alongside supporting agencies.

➤ VISION AMBITION 2: To have proactively worked with clients at an early stage, prior to the 56 days we have too statutorily Preventing homelessness in a timely manner is of benefit to both the Council and applicants. Extended periods of homelessness and time spent in temporary accommodation can result in isolation from family support, employment and schooling and have a negative impact on both adults and children.

Early intervention strategies are designed to work quickly to support individuals and families to either retain their housing, or if that is not possible, to use rapid rehousing strategies to ensure people move into safe and appropriate accommodation with the supports that they need. The Housing Solutions Team has a frontline service comprising of early Intervention officers and a triage team who identify households contacting the service at an early stage before they become homeless and ideally before a significant risk of homelessness arises and they do this by:

- Talking through options
- Trying to help keep households in their current home where possible
- Working with households to secure alternative accommodation

Since 1<sup>st</sup> April 2021, the Tenancy Support Team have achieved 617 positive outcomes across both Districts (Babergh 351, Mid Suffolk 266). Many of these outcomes have taken place at an earlier stage that statutorily necessary (which has been enabled by Duty to Refer). For example, early intervention where financial support has been offered prior to a Notice to Quit being served, means that any rent arrears were addressed early to prevent any formal eviction action from taking place.

➤ Survey Results

Survey respondents were asked about their perception of progress towards the 5 ambitions set out in the Vision of the Current Homelessness Reduction and Rough Sleeping Strategy:

Vision Ambition:	Achieved this ambition:	Significant Progress made:	Progress Made:	No Progress made:	Situation Worse:	No knowledge:
To have proactively worked with clients at an earlier stage, prior to the 56 days we have to statutorily	11.1%	11.1%	33.3%	0%	0%	44.4%

Respondents were also asked to comment on why/why not this ambition has/has not been achieved:

*We are increasingly confident that Duty to Refers are responded to at the earliest opportunity to maximise the time the customers is worked with.*

*We are not seeing clients who state that it is not being met.*

*I believe progress has been made here but I am not sure I have enough information about how frontline services are delivered in practice. I would imagine that finite resources make it more difficult to achieve this objective when there are an increasing number of homelessness applications from people who are already homeless or who are imminently homeless.*

*We are aware they do some homelessness prevention pre the 56 days*

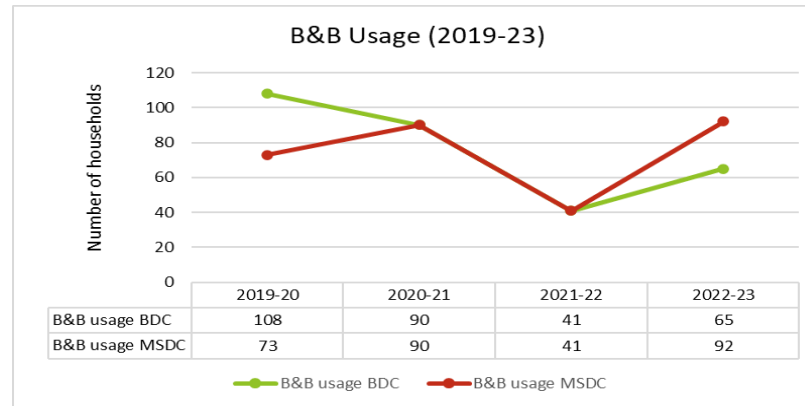
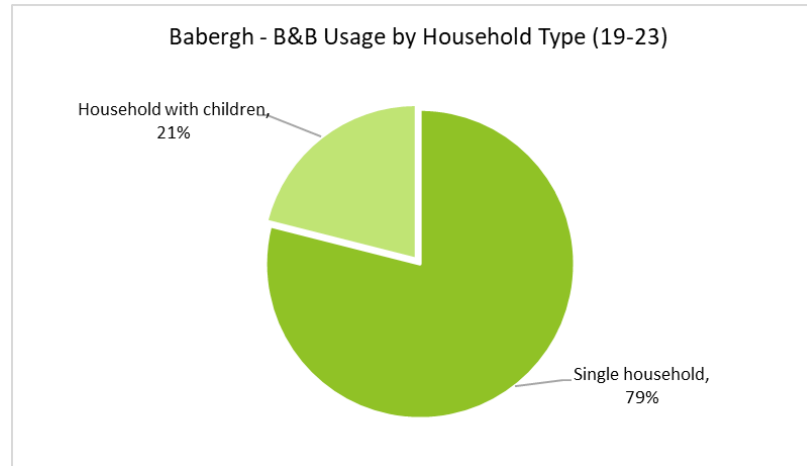
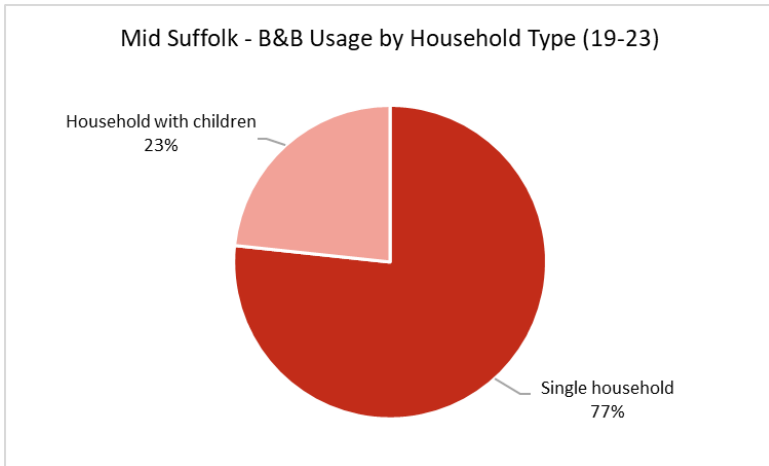
In conclusion, we consider that we have achieved the ambition of working with clients at an earlier stage than the statutory 56 days. The Duty to Refer has enabled the establishment of more collaborative working and more open channels of communication with other agencies and as such we are able to intervene and make a positive difference at an earlier stage.

➤ **VISION AMBITION 3: To have significantly reduced the usage of Bed and Breakfast**

Since 2019 Babergh and Mid Suffolk have increased the number of temporary accommodation units we can offer to those experiencing homelessness by 44 across both of our districts. This helps to reduce the number of households accommodated in Bed and Breakfast accommodation. We have recently reviewed our temporary accommodation acquisitions policy and our temporary accommodations placement policy to ensure that we are monitoring the demand to our service, and we will use these documents to inform a new Temporary Accommodation Strategy in 2024.

In Babergh, B&B usage fell by 38.9% in 2022-23 compared to 2019-20. However, in Mid Suffolk, B&B usage rose by 26% when comparing the same period.

85% of households with children that were accommodated in B&B were not accommodated there longer than 6 weeks.



- Survey Results
- Survey respondents were asked about their perception of progress towards the 5 ambitions set out in the Vision of the Current Homelessness Reduction and Rough Sleeping Strategy:



Vision Ambition:	Achieved this ambition:	Significant Progress made:	Progress Made:	No Progress made:	Situation Worse:	No knowledge:
To have significantly reduced the usage of Bed and Breakfast	0%	11.1%	11.1%	0%	11.1%	66.7%

No comments have been included from respondents due to the high percentage who stated they had no knowledge of this subject area.

In conclusion, although there has been significant progress in terms of an increase in the number of Temporary Accommodation units available, this has not been sufficient to end the use of Bed and Breakfast accommodation due to the increase in homelessness presentations and applicants needing temporary accommodation, this could be attributable to the ending of the covid 19 eviction ban and the national cost of living crisis. We are actively seeking further temporary accommodation both within our own stock and that of registered providers to mitigate the use of bed and breakfast/hotel accommodation.

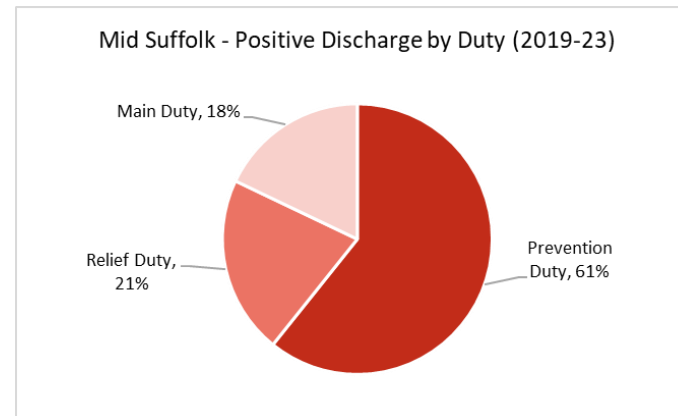
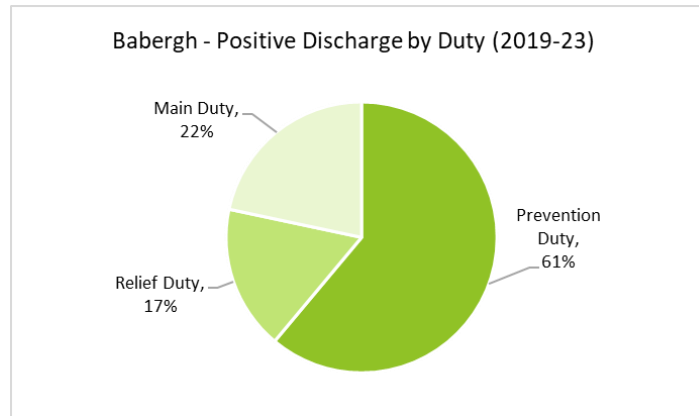
➤ VISION AMBITION 4: To have successfully prevented homelessness in the private rented sector

The cost-of-living crisis has and will continue to push more people to possible homelessness. The government actions during the pandemic, such as providing emergency housing, halting evictions and the temporary lifting Universal Credit payments have come to an end when millions of people face high housing costs and rises in inflation, fuel prices, and for some people on lower incomes, a rise in National Insurance contributions.

As a service we will always find ways to sustain tenancies such as incentives for landlords to offer and maintain tenancies for people on low incomes or with a history of homelessness, mediation and targeted legal advice for tenants. The Central Suffolk Lettings Team, the Housing Solutions Officers and the Tenancy Support Officers all complete work with clients encompassing the following points:

- We have encouraged private landlords to rent to tenants with experience of homelessness and have offered cash incentives, guarantees and deposit bonds.
- Changes to legislation around evictions have removed 'no fault' evictions and this will continue transitioning to provide a more protective environment for renters
- Forms of intensive case management are effective for those who require support for multiple disadvantages, with unconditional housing, such as Housing First, demonstrating strong outcomes

- Mediation and legal advice for tenants play an important role in securing better outcomes for people facing evictions



For the period 1st April 2019 – 31st March 2023, 61% of all positive outcomes were discharged within the prevention duty. Of all relief duties accepted throughout 2019-2023, 79% of relief duties accepted by Babergh District Council were initial duties (meaning the household had not been threatened with homeless prior). For Mid Suffolk, this figure was 76%.

From 1<sup>st</sup> April 2019 to 31<sup>st</sup> March 2023 there were 597 successful preventions in Babergh and 542 successful preventions in Mid Suffolk.

- Survey Results:
- Survey respondents were asked about their perception of progress towards the 5 ambitions set out in the Vision of the Current Homelessness Reduction and Rough Sleeping Strategy:

Vision Ambition:	Achieved this ambition:	Significant Progress made:	Progress Made:	No Progress made:	Situation Worse:	No knowledge:
To have successfully prevented homelessness in the Private Rented Sector	0%	33.3%	11.1%	11.1%	0%	44.4%

Respondents were also asked to comment on why/why not this ambition has/has not been achieved:

*We continue to have a number of clients who are being evicted from private rented accommodation and again your data should show you how successful you have been in preventing this. I know that the officers work hard to achieve this but it is really outside of their control unless they can secure funding to pay of arrears and persuade the landlord to keep people on.*

*The Central Suffolk Lettings Team have made a felt contribution.*

*I am aware that some homelessness will have been prevented by using the homelessness prevention fund, household support fund and discretionary housing payments to reduce and clear rent arrears. This is a big help but it doesn't address the real problem, which is the unaffordability of so much private rented accommodation and a growing problem with the affordability of social housing.*

*Evictions under section 21 of the Housing Act 1988 remains the main obstacle to reducing homelessness from the private rented sector, which means local housing authorities remain reliant on the Renters Reform Bill and overdue commitments made by central Government.*

*They have developed the Central Suffolk Lettings to work with landlords to source properties*

*We are getting significantly more landlords selling rental properties or issuing S21s for other reasons. This includes clients who have rented a property for many years and look on it as home. Private rented housing is very precarious for our clients and we are expecting it to get worse.*

In conclusion, we feel that significant progress has been made towards preventing homelessness from the Private Sector, our service provides a wider range of advice and services to people seeking homelessness assistance, and we have developed schemes to address the problems that most commonly result in homelessness applications. Our early intervention team are developing smarter processes to prevent private rented sector tenancies from ending including incentive payments to landlords to keep tenants, assistance with rent arrears, fast-tracked Housing Benefit claims and early warning systems, encouraging landlords to report problems with a tenancy early on so that we can provide support to reduce the risk of problems resulting in eviction

- VISION AMBITION 5: Ensured that everyone contacting the service receives in depth advice and assistance on their housing rights and housing options:

Within the lifetime of the current strategy, there have been several initiatives and new ways of working that have been set up and established, to ensure that this ambition is achieved:

The Triage and Early Intervention Team

- Deal with initial contacts to the Housing Solutions Team, prioritise and allocate cases to the appropriate officer.
- Provide in depth housing and homelessness advice and assistance and take positive action to help prevent homelessness with an Early Intervention Officer

- A Housing Solutions Officers works alongside the Triage Team to intervene on households threatened with homelessness in a swift way, mediating with landlords, family and friends and external agencies. New Advice Aid Website – start date March 2023
- AdviceAid ‘SelfServ’ is a self-service web app that is accessible from the BMSDC website providing tailored, quality, and localised housing advice in response to our customer’s needs and circumstances. The web app is branded in line with our website.  
<https://babberghmidsuffolk.adviceaid.uk/>
- Advice Aid covers the advice duty in section 179 of the Homelessness legislation, including tenant rights, benefits, harassment, S21 notices, mortgage arrears, domestic abuse, rights of occupation, welfare reform, illegal eviction, rent arrears, housing disrepair and much more.

The demand for the Housing Solutions advice and assistance service has increased dramatically in the most recent years. The number of calls to the service has increased from 7196 calls per year in 2020-21, to 12249 calls in 2022-23. This is an increase of just over 70% in two financial years.

#### ➤ Survey Results

Survey respondents were asked about their perception of progress towards the 5 ambitions set out in the Vision of the Current Homelessness Reduction and Rough Sleeping Strategy:

Vision Ambition:	Achieved this ambition:	Significant Progress made:	Progress Made:	No Progress made:	Situation Worse:	No knowledge:
Ensured that everyone contacting the service receives in depth advice and assistance	22.2%	0%	22.2%	0%	11.1%	44.4%

In conclusion, following the change in structure to include an early Intervention team and the addition of Advice Aid we feel that this ambition has been achieved.

## EVALUATION OF PRIORITIES:

The current Homelessness and Rough Sleeping Strategy 2019 – 2024 set out 5 priority areas to focus on. These are:

### ➤ PRIORITY AREA 1: Prevention of Homelessness

Homelessness prevention is not something that Babergh and Mid Suffolk Councils can do alone, and it requires a combination of action from our partner agencies in the public sector and support from the third sector.

Opportunities for us to prevent homelessness since the 2019 strategy can be explained in the following way:

**Targeted Prevention:** focussing on groups at particular risk of homelessness, for example those who are leaving institutions and care.

- Duty to refer - on specified public authorities to refer service users who they think may be homeless or threatened with homelessness to local authority housing solutions teams
- Working 'upstream' with prison and probation staff, Leaving Care Teams, Registered Providers and supported housing schemes
- People at risk of rough sleeping receive targeted support and advice to maintain their accommodation or find an appropriate alternative.

**Crisis Prevention:** Babergh and Mid Suffolk Councils hold statutory homelessness prevention responsibilities, and we focus on preventing homelessness when risk is imminent. This is in line with the Homelessness Reduction Act, where a person is "threatened with homelessness" when they risk losing their home within 56 days.

- Talking to landlords, friends or family to try and mediate to find a way for applicants to stay in their homes
- Assisting with applications to our Rent Guarantee Scheme and Rent Deposit scheme for assistance to move into the private sector
- Referrals to our Tenancy Support Team who offer budgeting advice, affordability assessments and referrals to the Citizens Advice for support with debts
- Support from our Tenancy Support Team to claim Discretionary Housing Payments, welfare benefits and housing benefit to increase income maximisation
- Advice to help you secure private rented accommodation
- Assistance to complete an application for our housing register [Home - HomeChoice \(gatewaytohomechoice.org.uk\)](https://gatewaytohomechoice.org.uk)
- Referrals to housing related support providers [Apply for housing related support - Suffolk County Council](#)
- People at risk of rough sleeping are identified at the earliest opportunity and their needs are understood and met
- Services for victims of domestic abuse, upstream advice on 'target hardening' enabling them to remain in their home.
- Housing rights, housing status, security, and rights of occupation; discrimination, harassment, and illegal eviction.

- Consequences of relationship breakdown, and implications for homelessness.
- Private Rented Sector access services: rent and mortgage arrears, and other money or debt issues which could lead to homelessness.
- Housing conditions
- Supported housing projects, and support services.

**Emergency Prevention:** focussing on those at immediate risk of homelessness, who may not have anywhere to sleep that night. The Councils currently have access to the following range of options for emergency and temporary accommodation:

- Units within our own housing stock, self-contained bedsits, flats, bungalows, houses, and houses of multiple occupation.
- 44 units in Babergh district and 40 units in Mid Suffolk district.
- 15 units of self-contained accommodation owned and managed by Registered Providers (RPs) where we have 100% nomination rights to the units.
- 4 supported and specialist domestic abuse satellite accommodation units.
- Spot-purchased private hotel rooms with some shared facilities (i.e., kitchens and/or bathrooms) for use in emergency placements out of hours.

**Recovery Prevention:** ensuring we minimise repeat homelessness among those who have already experienced it and who are most marginalised in our society.

- Longer term needs of people with a history of sleeping rough are identified and plans developed to respond to them.
- A personalised offer to meet every individual's needs, and sufficient capacity to maintain flow through a pathway of services.
- A personalised and holistic offer to best support someone with a history of sleeping rough be integrated into their community.

**Universal Prevention:** seeking to reduce the population-wide risk of homelessness, for example by ensuring that everyone has access to affordable housing and sufficient income to maintain that housing.

➤ **PRIORITY AREA 2: Supporting vulnerable households to secure and maintain accommodation**

Tenancy Support Officers work with any tenure of Landlord in supporting tenants and their households to financially prevent them from becoming homeless. A high percentage of their cases are Babergh and Mid Suffolk District tenants and the team work closely with Income Officers and the Housing Solutions team.

The Team begins with a financial assessment to make sure that households are in receipt of the correct benefits and will assist in benefit claiming if applicable to maximise their income. The Team will also assist with things like applying for Discretionary Housing Payments, attempting to get

benefits backdated and applying to charitable funds for household items and furniture. This work supports the wider housing team in preventing evictions in respect of affordability and rent arrears.

The Tenancy Support Team signpost individuals to organisations such as Citizens Advice when relevant to do so for advice on debt and debt relief.

At present the team are also administering the Household Support Fund for housing costs alongside Suffolk County Council who will assess essential items under the same provision.

The team are a valuable part of Housing Solutions and make a large contribution to the number of households that are classed as having been “prevented” from becoming homeless, keeping tenancies sustainable and avoiding court action and eviction.

➤ **PRIORITY AREA 3: Mitigating against the impacts of Welfare Reform**

The Tenancy Support Team have been administering the Governments Household Support Grant for housing costs and referring households to Local Welfare Allowance for essential item costs since June 2022 - [Suffolk Local Welfare Assistance Scheme - Suffolk County Council](#)

➤ Tenancy Support Officers work with any tenure of Landlord in supporting tenants and their households to financially prevent them from becoming homeless. A high percentage of their cases are Babergh and Mid Suffolk District tenants and the team work closely with Income Officers and the Housing Solutions team. The Team begins with a financial assessment to make sure that households are in receipt of the correct benefits and will assist in benefit claiming if applicable to maximise their income. The Team will also assist with things like applying for Discretionary Housing Payments, attempting to get benefits backdated and applying to charitable funds for household items and furniture. This work supports the wider housing team in preventing evictions in respect of affordability and rent arrears. Tenancy Support have:

- Administered Tranche 3 of the Household Support Fund, administering a total of £100,000 to 90 households.
- Received a total of 2074 referrals between 1<sup>st</sup> April 2019 and 31<sup>st</sup> March 2023 across both Districts.
- Recorded 617 positive outcomes between 1<sup>st</sup> April 2021 and 31<sup>st</sup> March 2023
- Secured funding of £338,055.25 for households via welfare benefit applications, Discretionary Housing Payments, and charitable applications (£202,519.81 for Babergh applicants and £135,535.44 for Mid Suffolk applicants)
- Secured 879 food parcels via foodbanks (428 in Babergh and 451 in Mid Suffolk)

The team also work with clients referring to Citizens Advice as necessary for in depth debt advice and working alongside the Accommodations Resettlement Officer to ensure that those households moving on from our temporary accommodation are ‘set up’ financially and have access to the furniture they require via charitable organisations and local furniture projects.

➤ **PRIORITY AREA 4: Increasing access to suitable accommodation**

To successfully prevent homelessness, we also needed to increase the accommodation options available. Babergh and Mid Suffolk District Councils source a number of accommodation options including supported housing, lodgings, private rented, temporary accommodation, shared housing and social housing.

The high house prices across Babergh and Mid Suffolk means that a lot of households are unable to access the housing market. Therefore, the private rented sector is in higher demand. High demand for private rented property has dramatically increased since the Covid pandemic with a huge reduction in re lets coming onto the market and in 2022 there were a record number of private landlords leaving the rental market and not returning due to constant government legislation imposed on private landlords, high interest rates, high build and property costs and the cost-of-living crisis impacting tenants ability to pay rent. The market has become a riskier place to operate for a landlord/investor.

From the tenant point of view affordability and availability are the main issues with many homeless households having low or no income, no guarantors, and a bad credit rating. Competition for property is high and often homeless households will not be able to access the open private rented market without assistance.

In 2020 Babergh and Mid Suffolk District Councils established Central Suffolk Lettings (CSL) with the aim of increasing access to good quality homes in the private rented sector for eligible residents. CSL is a fully integrated private lettings service within Housing Solutions and is a well-established brand with an online presence and a portfolio of 80 properties, CSL have good relations with local letting agents as well as directly with Private landlords. They offer a rent guarantee scheme which offers private landlords – tenant find, guaranteed rent, tenancy management and a cash incentive on joining. CSL have recently taken on their first House of Multiple Occupation re housing 3 homeless households.

There has been a total of 181 homeless duties discharged into the private sector via Central Suffolk Lettings since 1<sup>st</sup> April 2020, either via the Council's Guaranteed Rent Scheme, or Rent Deposit Scheme.

Ongoing CSL tenancies as of 31 <sup>st</sup> March			
	2020-21	2021-22	2022-23
MSDC	3	12	30
BDC	16	27	49



Delivery of affordable housing remains a key priority for BMSDC. Between 1<sup>st</sup> April 2019 and 31<sup>st</sup> March 2022 there have been 333 additional affordable housing homes built in Babergh and 517 in Mid Suffolk:

Year	BABERGH			MID SUFFOLK		
	Net Completions:	Of which Affordable:	% Affordable:	Net Completions:	Of which Affordable:	% Affordable
2021-2022	758	130	17%	862	196	23%
2020-2021	402	89	22%	672	193	29%
2019-2020	293	114	39%	451	128	28%

**Data Source: BMSDC Annual Monitoring Report 2021-2022. Net Residential Completions**

We continue to work closely with the Housing Related Service at Suffolk County Council to ensure need and demand is considered when commissioning Housing Related Support services.

➤ **PRIORITY AREA 5: Raise aspirations of positive health & wellbeing amongst homeless people**

This is being achieved with the support of a new role Resettlement Officer in the Temporary Accommodation Team, this role created in 2021 is key in assisting and encouraging customers to meet their personalised housing plans, as set through our statutory homelessness duties, and helping them to access support from a wide range of agencies including employment, training and voluntary work. This work aims to focus on the whole person to improve the customer’s wellbeing and eradicate barriers to sustaining accommodation, reducing the incidence of repeat homelessness.

Being homeless can also have such a negative impact on someone’s health and wellbeing sometimes making them feel marginalised in society and causing difficulties in accessing health services. Babergh and Mid Suffolk Housing Solutions Team begin signposting individuals identified as having a need on accessing the homelessness journey to services for support with mental health, physical health, drugs and alcohol and for help in contacting and registering with health provision and we work closely with The Marginalised and Vulnerable Adult Team - [NHS Health Outreach Team – Ipswich Outreach](#)

➤ **PRIORITY AREA 6: End Rough Sleeping**

Rough Sleeper Initiative 2022-2025 is funding that Babergh and Mid Suffolk successfully bid for, and it underpins the service and team that supports rough sleeping in our districts.

The Tenancy Sustainment Team funded by the Rough Sleeper Initiative (RSI) funding are working closely with households at risk of rough sleeping and offering targeted support and advice to maintain their accommodation or find appropriate alternatives, this work is informed by the rough

sleepers the team have worked alongside as we need to hear the issues and barriers that rough sleepers faced prior to rough sleeping and the problems they experience while rough sleeping. The Tenancy Sustainment Officers will continue the work with rough sleepers after their placement and into settled accommodation as floating support.

Those sleeping rough in our districts are assessed and supported from the street to our assessment (Step) beds and are identified by calls from members of the public, professionals or via self-referral. Rough sleepers are also located during routine patrols visiting popular rough sleeping sites by our Rough Sleeper Outreach Team whose posts are funded through RSI. The posts are flexible and responsive and supported by the RS Tenancy Sustainment Team when necessary.

The verification of rough sleepers is completed within 24 hours but without compromising safety. Efforts are made prior to verification to gather information from the referrer and the rough sleeper. The Customer Alert List is checked, and a comprehensive map reconnaissance and contingency plan made. Direct communication to CCTV teams is also used if required. Support from colleagues, police or other agencies is requested if appropriate.

The Outreach Team will offer an immediate short term emergency bed 'Step Bed' for a period of 56 days, we have 4 across both districts, and assess the needs of a rough sleeper using a 'vulnerability assessment' which will inform the journey identified for the rough sleeper, this could include supported housing, a transitional bed for up to 2 years funded by RSI , private rented sector offers or social housing.

We have 12 transitional beds for use of up to 2 years in order that we can respond to changing needs of a rough sleeper over a course of time and ensure that they are ready to sustain a tenancy before moving into long term settled accommodation.

## ACHIEVEMENTS IN LIFETIME OF CURRENT STRATEGY (2019-2024)

During the lifetime of the current strategy, we have:

- **Embedded auditing Housing Solutions as ‘business as usual’ to ensure consistency in service delivery and to capture opportunities for continual improvement.**

The Housing Solutions Team Manager and Assistant Manager complete periodic and random monitoring of cases and recording alongside 121 meetings every four weeks with officers and team meetings ensuring the officers have a consistent and fair approach to case management and identifying opportunities for continual improvement through training and development.

- **Developed and implemented a comprehensive online advice service for clients to access housing options advice.**

Advice Aid implementation May 2023 - <https://baberghmidsuffolk.adviceaid.uk>

- **Continued to ensure that all cases are accurately recorded.**

Housing Solutions Officers complete a ‘housekeeping’ meeting monthly to ensure that all cases are recorded and progressed as per our statutory duties under homelessness legislation.

- **Developed a process for offering short term support and ongoing contact to monitor the progress of clients and to reduce the risk of repeated homelessness from temporary accommodation.**

Creation of a new Resettlement Officer post 2021 within the temporary accommodations team who will be assisting and encouraging customers to meet their personalised housing plans and helping them to access support from a wide range of agencies. This is with an aim to focus on the whole person to improve the customer’s wellbeing and eradicate barriers to sustaining accommodation, reducing the incidence of repeat homelessness.

- **Participated in multi-agency panels to manage, monitor and find housing solutions for the hardest to house clients.**

The Rough Sleeping Team Manager attends the Ipswich Rough Sleeper housing for us for hard to house clients across Suffolk and neighbouring counties including Colchester Borough Homes, this enables the team to monitor clients who are geographically mobile to provide the best bespoke support alongside our colleagues in different agencies, districts and boroughs.

➤ **Continued to work with Public Health to support services for vulnerable adults and provide data as required to understand costs associated with homelessness, including the commissioning of dedicated services (such as DAROS). Provided Public Health with meaningful data to inform commissioning decisions, to help maintain services for marginalised adults.**

- SODA (Suffolk Office of Data Analytics) is a virtual hub, set up as a collective endeavour among Suffolk's public services with a view to make better use of data and generate new insights.
- SODA originated from the Suffolk System-wide Data and Insight workstream, funded through the Transformation Challenge Award (TCA) in 2015, which saw the collaboration of Suffolk police with all local authorities and other public sector organisations.
- Following this, an official ODA was established in June 2018. This project has been awarded funding for the next two years (2018/19 - 2019/20) from all partners, each equally contributing financially to the ODA.
- With all partners contributing equally, there is no lead organisation. This means that the whole system will benefit from SODA's work, with issues being tackled with a place-based approach.

➤ **Reviewed our approach to transitional support for those moving on from supported accommodation in case the Supported Lettings Funding ends in March 2021, to consider improvements which could be made to further reduce the risk of repeated homelessness.**

The Supported Lettings Team have now been made permanent within the organisation and continue to offer support to those at risk of repeated homelessness.

➤ **Continued to work closely and meet with the DWP and CAB to tackle the impacts of welfare reforms and the roll out of Universal Credit, on an ongoing basis.**

The Tenancy Support Team and the Tenancy Management Officer in the Central Suffolk Lettings Team work regularly from our local Job Centres attending meetings to discuss cases. Housing Solutions continues to work with Citizens Advice alongside our Communities Team and the new Cost of Living Coordinator role.

- **Monitored repayment agreements and the number of evictions for rent arrears to consider the success of our budgeting advice and affordability checks, so we can help clients to manage their income effectively.**

There has been a total of 552 referrals received by Housing Solutions from the Income Team (Babergh 316, Mid Suffolk 236)

- **Rebranded the Rent Deposit Scheme and monitored the work of Central Suffolk Lettings, to report back to members on key indicators.**

Central Suffolk Lettings (CSL) are now a well-established brand with an online presence and a portfolio of 80 properties, CSL have good relations with local letting agents as well as directly with Private landlords. CSL offer a rent guarantee scheme which offers private landlords – tenant find, guaranteed rent, tenancy management and a cash incentive on joining. CSL have recently taken on their first House of Multiple Occupation re housing 3 homeless households. [DLUHC presentation Oct 22.pptx \(sharepoint.com\)](#)

- **Ensured continued workforce training and development on the links between homelessness and; mental health, drugs and alcohol, PREVENT, gangs, county lines, Making Every Contact Count and Domestic Abuse/ Violence; and worked with the Communities Team to review training.**

Housing Solutions Officers have completed the new Domestic Abuse Champions Training and continue to have refresher training on all aspects which impact homelessness.

- **Ensured that everyone in temporary accommodation has access to appropriate health services on an ongoing basis and determine whether and how we can improve the health and wellbeing of those clients, with research and recommendations.**

Collaboration with NHS Health Outreach and support of the Resettlement Officer.

- **Continued to ensure that all temporary accommodation is regularly inspected to ensure it meets all regulatory standards.**

Weekly and monthly room and property checks by officers, asbestos, legionella, PAT, gas and electric checks completed when units become void.

- **Enhanced our Tenancy Support Service and investigated the possibility of a resettlement scheme for those in temporary accommodation.**

A new Resettlement Officer post has been created.

- **Continued to ensure that we make suitable provision for rough sleepers in extreme weather conditions under Severe Weather Emergency Provision.**

Working in alignment with our neighbouring districts and boroughs for decisions about when to activate SWEP – Communications on our websites and social media outlets.

- **Continued to access funding streams when available for additional support to tackle rough sleeping.**

Rough Sleeper Initiative funding 2022-2025 and Rough Sleeper Accommodation Programme were both successful bids.

- **Ensured contact is made with all rough sleepers within 24 hours of being notified of them.**

We can be contacted directly from members of the public, by referrals from professionals or by [Streetlink](#)

- **Ensured that rough sleepers presenting from another area, where safe to do so, are reconnected back to the area they originated from.**

The process by which people sleeping rough, who have a connection to another area where they can access accommodation and/or social, family and support networks, are supported to return to this area in a planned way.

## STAKEHOLDER AND PARTNER ENGAGEMENT

- A survey was conducted to capture the views of our Stakeholders and Partners, so that their expertise, perceptions and insight could feed into this review.
- Question 1  
Respondents were asked what organisation they worked for. The 9 respondents came from a range of organisations: Suffolk County Council, Citizens Advice Bureaux, Probation, Mental Health Services, Welfare Rights and Housing Associations.
- Questions 2-6  
Respondents were asked their view on if BMSDC has achieved the ambitions that it set out in the vision of the Joint Homelessness Reduction and Rough Sleeping Strategy. The outcome of this has been weaved in previous sections of this review, however for completeness the Survey showed:

Vision Ambition:	Achieved this ambition:	Significant Progress made:	Progress Made:	No Progress made:	Situation Worse:	No knowledge:
To have ended rough sleeping in our districts	0%	11.1%	44.4%	0%	0%	44.4%
To have proactively worked with clients at an early stage, prior to the 56 days we have to have done statutorily	11.1%	11.1%	33.3%	0%	0%	44.4%
To have significantly reduced the usage of Bed and Breakfast	0%	11.1%	11.1%	0%	11.1%	66.6%
To have successfully prevented homelessness in the Private Rented Sector	0%	33.3%	11.1%	11.1%	0%	44.4%
Ensured that everyone contacting the service receives in depth advice and assistance	22.2%	0%	22.2%	0%	11.1%	44.4%

➤ Question 7

Respondents were asked what they thought were the biggest challenges/ barriers currently facing BMSDC residents in terms of housing/homelessness? Respondents were asked to rank the list in order. The survey showed:

Challenge/ Barrier to Housing:	Ranked:
Access to affordable private rented accommodation	1 <sup>st</sup> (Biggest Challenge/Barrier)
Shortfall between LHA rates and average rents	2 <sup>nd</sup>
Lack of affordable accommodation for single under 35s	3 <sup>rd</sup>
Lack of accommodation for people with complex needs	4 <sup>th</sup>
Cost of Living Crisis – leading to rent arrears	5 <sup>th</sup>
Rural location making it more challenging to support people	6 <sup>th</sup>

The question also asked for comments and received the following responses:

*From clients accessing our service, all the above have been cited by clients and are hard to prioritise. Rural locations are also a major factor.*

*I am unable to rank the list above because they are all so relevant but I note that the chronic lack of social housing does not appear in it. An increase in the supply of social housing (especially council housing) remains the best and most obvious solution to homelessness. The fact that it seems so far out of reach (an indictment in itself) should not result in it being excluded from the list of challenges/barriers.*

➤ Question 8

Respondents were asked if they were currently doing anything to prevent homelessness? 100% of respondents answered yes. Further comments received highlighted the following:

*We provide crisis support to clients that will include helping them to remain in their homes and supporting them when they are homeless. We provide debt advice and the largest debt is council tax arrears.*

*Working as Accommodation Support Officer for National Probation Services, aiming to work closely with LAs across Suffolk to establish good working relationships and make as many early interventions as possible to prevent/relieve homelessness.*



*The usual stuff through the Welfare Rights Helpline: income maximisation, housing advice, involvement with defending possession proceedings. ICCARS (Ipswich County Court Advice and Representation Service. Joint working (e.g. Young Persons Housing Action Group, Suffolk Homelessness Officers Group). Work with care leavers (via SCC's Children's Services and Leaving Care Teams, especially in the area of supported accommodation and staying put.*

*We provide 19 beds in MSDC of HRS accommodation for single people - contracted by Suffolk County. 24 HRS beds in Babergh. We work in partnership with other providers in HRS group and other organisations. Raise awareness of homelessness. If we can find the bed spaces, we have funding for a Womens Accommodation Service - for women in the CJS. Help other agencies with move on. Work with Multiply Suffolk - help to access in employment. Refer to advice agencies for debt and welfare benefit advice.*

*We provide accommodation for those with enduring mental health conditions who would otherwise be homeless or in a cycle of homelessness. We also provide skills in small non classroom based setting to those who are ready to move on so they stand a better chance of sustaining their tenancies.*

➤ **Question 9**

Following on from the previous question, respondents were asked if BMSDC could offer support with these activities? The responses showed:

*We receive a revenue grant that supports the delivery of our cores service. Debt is not a core service. There are opportunities to work jointly to tackle homelessness and the risk of homelessness but these would need to be funded by BMSDC. Previous projects have been delivered with BMSDC but there is a lack of engagement to move this forward.*

*BMSDC are very supportive in my experience and this is demonstrated through their willingness to carry out assessment for people in Custody prior to release, to follow up with relevant enquiries and conversations with practitioners, to treat people fairly without bias.*

*It would be good to be invited to any future meetings to be involved and have a better awareness where we can link in with Mid Suffolk District Council and Babergh District Council.*

*Yes, by helping us to find suitable properties, removing barriers to rent deposit scheme to help move on, facilitate a forum and regular communication and provide a Point of contact with benefit teams - to help our relationship with Suffolk Revenue Partnership.*

➤ **Question 10**

Respondents were asked if they felt they had sufficient opportunities to contribute to multi agency discussions and are involved in partnership working around housing and homelessness.

Comments showed that there is an appetite for more multi-agency discussions and increased partnership working, with 6 out of 9 respondents stating that they did not feel that they had sufficient opportunities to contribute to multi-agency discussions.

*I think the pandemic caused us all to lose touch, we were attending meetings in all areas but now we are not sure what meetings are taking place.*

➤ Question 11

Respondents were asked if they would you be interested in being part of a BMSDC homelessness forum?

Comments demonstrated that there is an appetite to be part of a Homelessness Forum; 100% of respondents stated that they would be happy to proactively be part of such a forum with concerns over data sharing agreements from one respondent.

➤ Question 12

Respondents were asked if they had any further comments that they wanted to feed into the development of BMSDC's next Homelessness Reduction and Rough Sleeping Strategy?

*More collaborative working to develop processes that deliver better results for the individuals and reduce demand of ours and BMSDC services.*

*Needs greater focus on homelessness prevention and proactive approaches to homelessness prevention - a wider focus than just the statutory requirements. Needs a more holistic approach to prevent homelessness. Reduce bureaucracy and system approach. Needs more communication about RS services and emergency provision - not sure what the outreach team does - they need to target the more rural areas*

## OTHER INITIATIVES & ACTIVITIES SUPPORTED BY MSDC WHICH CONTRIBUTE TO PREVENTING HOMELESSNESS

### ➤ BEAM

Funded by the RSI allocation to support individuals accessing homelessness services in our districts into jobs and homes that lift them out of homelessness for good. Each person receives a dedicated caseworker who connects them with a supportive online community who provide funding and mentorship, finally matching them with forward-thinking employers and landlords.

Program overview:

- 10 residents completed their first meeting with Beam
- 20 sign-up forms completed
- 39 residents referred
- 4 residents joined Beam - 1 started work

Further Details can be found: [Beam Homeless Social Enterprise - Sponsor a Homeless Person in the UK Into a Job](#)

### ➤ Rough Sleeper Initiative

Funding successfully allocated 2022-2025, this underpins our bespoke rough sleeper service.

### ➤ Rough Sleeper Accommodation Programme Initiative

Providing longer term accommodation for rough sleepers – currently in progress.

### ➤ Homelessness Prevention Fund 2023-2025

Provided to councils in England over the next 2 years through the Homelessness Prevention Grant, to support the delivery of services to prevent and tackle homelessness.

### ➤ Domestic Abuse Link Worker and Domestic Abuse Burdens Funding

To cover the cost of new burdens associated with the expansion of priority need to those forced into homelessness by domestic abuse, following the landmark Domestic Abuse Act 2021.

### ➤ Domestic Abuse Link Worker

- Received a total of 212 referrals since Domestic Abuse Link Worker came in to post in March 2022.

- Of these 212 households referred, 116 were households with children. A total of 226 children (as part of households) were referred during this period.
- Households experiencing domestic abuse (DA) have been accommodated within the Council's Satellite Refuge provision and we have worked closely with other Suffolk LA's regarding sourcing provision outside of our districts.
- As well as rehousing households experiencing DA we have also supported households to carry on occupying the home they presented from, with safety measures being put in place and supporting households to access legal advice.

➤ **Babergh and Mid Suffolk Citizens Advice Services**

Referring people for help with problems relating to debt, benefits, employment, housing, relationships and legal issues. Advisers provide free advice to help clients with their issue; they also make referrals to third parties, fill out forms, write letters, negotiate with creditors and can even represent them in court or at a tribunal. [About Us - Mid Suffolk Citizens Advice Bureau \(midsuffolkcab.org.uk\)](https://midsuffolkcab.org.uk) [Home page \(sudburycab.org.uk\)](https://sudburycab.org.uk)

➤ **Empty Homes Project**

Babergh and Mid Suffolk District Councils aim is to reduce the number of long-term empty properties within the districts by bringing empty properties back into use and discouraging owners from leaving them empty.

In Babergh and Mid Suffolk, there are approximately 582 long term empty homes (December 2022 – Stats taken from Revenue & Benefits data). The government wants to increase the number of empty homes that are brought back into use, as a sustainable way of increasing the overall supply of housing, and to reduce blight on neighbourhoods. The government wants builders, investors, and local councils to increase the supply of repurposed empty homes. A dedicated Empty Homes team, within Private Sector Housing, at Babergh and Mid Suffolk District Councils was established in November 2021, and expanded in May 2022.

Babergh and Mid Suffolk District Council have developed a branded identity to launch its own Empty Homes service into a customer facing solution. Houses 4 Homes is the rebranded name of the existing Empty Homes team within both combined authorities. The rebranding took effect from 1st February 2023 with a series of Communication messages and marketing to highlight the service

➤ **Collaborative working and pathways for vulnerable cohorts**

Transition - previously looked after children (care leavers); people released from prison; people leaving the armed forces, and people discharged from NHS care. It also includes people who have been the responsibility of the Home Office through the asylum and immigration system.

## REVIEW FINDINGS

### ➤ Summary

When the current Joint Homelessness Reduction and Rough Sleeping Strategy was published in 2019, nobody could have predicted the Covid-19 Pandemic and the impact it would have locally, nationally and globally. This fundamentally changed the landscape within which the Strategy was operating, and this backdrop needs to be kept in focus when evaluating the past and looking ahead to the future.

### ➤ Major Issues

This Homelessness Review has identified the following major issues to be addressed in the next strategy:

- Access to affordable private rented accommodation
- Shortfall between LHA rates and average rents
- Lack of affordable accommodation for single under 35s
- Lack of accommodation for people with complex needs
- Cost of living crisis – leading to rent arrears and mortgage arrears
- Rural location making it more challenging to support people

### ➤ Gaps in Provision

This Homelessness Review has identified the following gaps in provision to be addressed in the next strategy:

- Lack of coded properties within our own stock
- Lack of positive collaboration at County level regarding Social Care and capacity
- Not enough adequate mental health support
- No support for dual diagnosis – pin pong of clients from agency to agency
- The idea that Housing Solutions provide support for clients in TA
- We are continuing to work at a County level with District & Borough partners on referral routes particularly from prison services, mental health primary care and supported housing to prevent homelessness and rough sleeping, however this is still a major gap in our joint services.
- We have no suitable 'high needs' supported housing projects – low to medium needs supported housing projects are unable to cope with many complex clients which results in eviction and a move into TA.
- A single assessment tool used by all services to establish 'capacity' of a client – work needed alongside Adult Social Care to avoid the placement of individuals who will ultimately not sustain their tenancies.

- We need a more flexible use of DHPs to prevent homelessness i.e.: rent in advance, deposits and other costs associated with a housing need such as removal costs.
  - More accurate information from health regarding clients being discharged from hospital.
  - We need to work with the larger Registered Providers in relation to ongoing support for recently housed former rough sleepers and work with them to assess what ongoing support is required to enable the longer-term sustainment of new tenants beyond the starter tenancy stage.
- Emerging Vision, Themes & Priorities for Next Strategy
- Build on foundations to empower residents to self-advocate, support residents to take action themselves
  - Shift discussion – homelessness is a life event that could happen to anyone – support with preventative steps to avoid
  - Destigmatise homelessness
  - Early Intervention should be the driver for the next Strategy – refocus work on preventative ‘upstream’ action
- Ambitions for Next Strategy
- Housing First

During the Pandemic and in the following stage of recovery local authorities and partner agencies have become stuck in a cycle of response. The Teams are exceptional at putting out fires, dealing daily with emergency situations and households in crisis, still struggle to make our way upstream to fix the systems that caused the problems.

This strategy resolves to push upstream and to actively prevent problems rather than respond to them and in this new way of working engage the services of partner agencies ultimately drawing attention for our multi agency successes in the way we approach the issue of homelessness in providing an exemplary service.

We should no longer be trying to just take care of the problem of homelessness but ending the problem and one of the ways in which we can achieve this strategic aim is by looking at ‘Housing First’ for those applicants who fall into a complex needs category.

Housing First is an approach to ending homelessness through housing and support provision. It prioritises access to permanent housing with tailored, open-ended, wraparound support for the resident that emphasises choice and control. The intensive support is free from conditions, apart from the willingness to sustain a tenancy. Individuals are not required to be housing-ready before moving into their home; rather, secure housing is a stable platform from which to address other issues.

It focuses on a specific group of people with histories of repeat homelessness, very complex needs, experience of multiple disadvantages and for whom other services have not been successful in ending their homelessness. Evidence shows that the model helps these people housed and helps them to make improvements in their health, wellbeing and social and economic integration.

There is no unified national policy around Housing First. According to Housing First England, mostly local authorities or voluntary sector providers develop the services locally. The approach can be funded through local authority commissioning, other statutory funding sources (such as public health and adult social care), or non-statutory funding such as trusts, foundations and philanthropy. [Mobilising Housing First toolkit: from planning to early implementation - GOV.UK \(www.gov.uk\)](#)

➤ The Domestic Abuse Housing Alliance

This strategy recognises that our Domestic Abuse Link Worker has coordinated an organisational response to the Suffolk Domestic Abuse Champions Network who are now entering their fourth year with more than 1200 people across the county trained as champions, Babergh and Mid Suffolk District Councils have had 37 members of staff trained as champions however we need to ensure that this strategy continues to strengthen our commitment to responding to domestic abuse alongside all housing providers.

The Domestic Abuse Housing Alliance (DAHA) accreditation is the UK benchmark for how housing providers should respond to domestic abuse in the UK. They are the only project in the UK offering a domestic abuse accreditation for the housing sector. DAHA accreditation is recognised in the governments Ending Violence against Women and Girls Strategy: 2016 to 2020. [VAWG Strategy FINAL PUBLICATION MASTER vRB.PDF \(publishing.service.gov.uk\)](#)

By becoming DAHA accredited, Babergh and Mid Suffolk Councils would be taking a stand to ensure we deliver safe and effective responses to domestic abuse.

In terms of commitment, there is no getting away from the fact that there is a big commitment of time and effort. There are 43 standards in 8 Priority Areas of practice that are required to be embedded in practice to achieve accreditation. There is also a training investment required. The costs payable includes Membership fees (annual) and assessment fees (assessment takes place every 3 years after first accreditation. This is however an investment and working to these standards reduces homelessness, saves lives and saves money.

Adopting and embedding standards takes time. The average length of time it takes local authorities to complete their accreditation varies depending on size and directorates and whether they have and manage stock, but 18 months-2 years is commonplace. Throughout this time, we would get the support of experienced Regional Leads to guide us plus access to many resources and all the other benefits that membership gives. Sign up to the accreditation would need to be agreed to and supported at a senior leadership level.

[Whole Housing Toolkit - daha - Domestic Abuse Housing Alliance \(dahalliance.org.uk\)](https://dahalliance.org.uk)

➤ Early Intervention

The Housing Solutions Team are currently recruiting two extra Housing Solutions Officer posts to work 'upstream' on cases that lend themselves to early intervention processes, these cases will not be within the 56 days statutory guidance within homelessness legislation and will prevent households moving into the legislative duties thus decreasing the number of cases that move into main duty phase.

Once fully recruited the Early Intervention Team will consist of four Housing Solutions Officer roles and two Triage posts.

This service will continue to build on the priority area 1: Prevention of Homelessness covered in the current strategy.

➤ Strategic Review of Temporary Accommodation

We need to review the options available to Babergh and Mid Suffolk Districts to better meet the needs of families in temporary accommodation. This will enable delivery of the right type of temporary accommodation across the districts, to achieve quality and value for money, responding to the acute shortage in housing supply and meeting identified demand from households who face challenges in accessing social and affordable housing.

Guiding Vision and key outcomes:

- A district wide framework to improve outcomes and life changes for households who are temporarily homeless.
- Analysing projected demand for temporary accommodation regarding numbers, size, and location of units, and managing delivery to ensure a sufficient supply of suitable accommodation.
- Secure, sustainable long-term improvements in accommodation arrangements that meet our lettable standard, reducing the use of bed and breakfast, hotel or similar private sector accommodation.
- A consistent approach to temporary accommodation across the districts that can respond to local issues and changing demand.

➤ . Next Steps

- Engagement with Members
- Direction from Corporate Plan Refresh
- Joint Cabinet Briefing – 14<sup>th</sup> November 2023



- Joint Overview and Scrutiny Committee – 16/20 November 2023
- Public Consultation – November/December/ January
- Babergh Council – TBC – March 2024
- Mid Suffolk Council – TBC – March 2024

Equality Impact Assessment (EIA)  
Initial Screening Form



Screening determines whether the policy has any relevance for equality, ie is there any impact on one or more of the 9 protected characteristics as defined by the Equality Act 2010. These are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership\*
- Pregnancy and maternity
- Race
- Religion or belief (including lack of belief)
- Sex
- Sexual orientation

24

<p>1. Policy/service/function title</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 22</p>	<p>Babergh and Mid Suffolk Homelessness Reduction and Rough Sleeping Strategy 2024 – 2029.</p>
<p>2. Lead officers (responsible for the policy/service/function)</p>	<p>Amma Antwi-Yeboah</p>
<p>3. Is this a new or existing policy/service/function?</p>	<p>Homelessness Reduction and Rough Sleeper Strategy 2024 – 2029 is a 5-year review of the previous Homeless Strategy and incorporates a revision ensuring compliance with new Duties under the Homelessness Reduction Act 2017.</p>
<p>4. What exactly is proposed? (Describe the policy/service/ function and the changes that are being planned?)</p>	<p>If policy / service or function changes are required as part of the Homelessness Reduction and Rough Sleeper Strategy, specific Equality Impact Assessment work will be carried out as that programme of work is developed.</p>

<p>5. Why? (Give reasons why these changes are being introduced)</p>	<p>There is a legal requirement for the Councils to carry out a review of Homelessness in its Districts every five years and then formulate a strategy and associated action plan to detail how the Councils will continue to tackle homelessness issues over the next five years.</p>
<p>6. How will it be implemented? (Describe the decision- making process, timescales, process for implementation)</p>	<p><b>Summary of Homelessness Reduction and Rough Sleeping Strategy development process</b></p> <ul style="list-style-type: none"> <li>a. Scoping / ideas / SLT December 2022 – July 2023</li> <li>b. Political formal decision-making processes: <ul style="list-style-type: none"> <li>• Joint Overview and Scrutiny for process sign-off. October 2023</li> <li>• Cabinets to comment on 1<sup>st</sup> draft, seek approval for next stage (6-week consultation): October 2023</li> <li>• Full Councils: Request adoption of both strategies: Scheduled for March 2024</li> </ul> </li> <li>c. Additional input from: <ul style="list-style-type: none"> <li>• Initial stakeholder consulting March 2023.</li> <li>• All Member briefings x 2; End October 2023 and November 2023.</li> <li>• 6-week open consultation period early Dec 2023 to January 2023 The consultation was conducted via a variety of communication channels and in formats to ensure groups are not knowingly excluded.</li> </ul> </li> </ul>

<p><b>7.</b> Is there potential for differential impact (negative or positive) on any of the protected characteristics?</p>	<p>Yes, there is a potential, but it is likely to be a positive impact.</p> <p>Any policies to be adopted to support the delivery and implementation of the Homelessness Reduction and Rough Sleeping Strategy will complete an EQIA to ensure there are no negative impacts.</p> <p>The aim of the Homelessness Reduction and Rough Sleeping Strategy is to improve outcomes for those facing a housing crisis. We are also required to follow legal procedures to ensure we accurately support and assess applications for assistance.</p>
<p><b>8.</b> Is there the possibility of <b>discriminating unlawfully</b>, directly, or indirectly, against people from any protected characteristics?</p>	<p>No; the Homelessness Reduction and Rough Sleeping Strategy is focussed on creating a positive impact on residents, housing availability, current housing stock conditions and housing related services provided by both Councils and other providers.</p>
<p><b>9.</b> Could there be an effect on <b>relations between certain groups</b>?</p>	<p>No.</p> <p>The Homelessness Reduction and Rough Sleeping Strategy is intended to enhance relations between certain groups by extending and creating greater choice and options in the local housing markets and additional housing information services.</p>
<p><b>10.</b> Does the policy explicitly involve, or <b>focus on, a particular equalities group</b>, i.e., because they have particular needs?</p>	<p>No, but should any policy / service or function changes be required as part of the implementation of the revised Homelessness Reduction and Rough Sleeping Strategy outcomes, additional specific EQIA work will be carried out as that programme of work is developed to ensure compliance with the Public-Sector Equality Duties.</p>

**Proceed to full assessment:** **Equalities Lead sign-off:**

**Authors signature:** Amma Antwi-Yeboah, Corporate Manager – Housing Solutions

**Date of completion:** 2<sup>nd</sup> October 2023

\* Public sector duty does not apply to marriage and civil partnership.

This page is intentionally left blank

# Babergh and Mid Suffolk District Council's Joint Homelessness Reduction & Rough Sleeping Strategy Consultation: Feedback Report and Analysis

## 1. INTRODUCTION

Babergh and Mid Suffolk District Councils ran a consultation on the draft Joint Homelessness Reduction and Rough Sleeping Strategy to:

- Ensure that the vision and the priorities of the Strategy were supported by residents
- To gather feedback to inform any necessary amendments to the draft Strategy and Delivery Plan
- To hear specifically from people with lived experience of homelessness/rough sleeping or being threatened with homelessness/rough sleeping

Respondents were encouraged to read the draft Strategy and draft Delivery Plan before responding to an online survey. Respondents also had the opportunity to make comments to be taken into consideration before the Strategy was finalised and presented to full Councils for adoption, in March 2024.

## 2. THE CONSULTATION

An Online Consultation Survey was 'live' from Monday 4th December 2023 to Sunday 14th January 2024.

The Consultation survey was hosted on CitizenLab: an online Community Participation Platform.

The Consultation Survey was promoted via:

- X (Formerly Twitter)
- Facebook
- LinkedIn
- My Home Bulletin (BMSDC Communication with tenants)
- Working Together (Internal BMSDC communication with Staff)
- Babergh DC Website
- Mid Suffolk DC Website
- Email to residents who had signed up to be alerted to new BMSDC resident engagement activity through CitizenLab
- Email to Partners and Stakeholders of Housing Solutions and Homelessness Services

- Email to households registered for housing on Gateway to Homechoice.

In addition to the online survey:

- All member-briefing sessions were held to present the Strategy and Delivery plan to members and to answer any questions. (See Section 8)
- The draft Strategy and Delivery Plan were presented to the BMSDC Tenant Board (See Section 9)
- A session was held with representatives of Citizen Advice Bureau to discuss their specific feedback on the Strategy & Delivery Plan (See Section 10)

**3. THE SURVEY**

The Consultation Survey consisted of 12 questions and was a mixture of multiple-choice questions and questions with the opportunity to provide further comments.

Respondents were asked separately about:

- The Vision
- The Priorities
- The Strategy Document

The Consultation Survey was completed by 118 people.

The breakdown of respondents was:

	Number	Percentage
Member of the Public	54	45.8%
Local Authority Employee or Member	30	25.4%
Member of the public with experience of Homelessness/Rough Sleeping	18	15.3%
Other Voluntary Sector Organisation	7	5.9%
Other Statutory Organisation	6	5.1%
Provider of Homelessness Services	3	2.5%
Total:	118	100%



**4. THE VISION**

Respondents were asked if they agreed with our Vision that ‘Rough Sleeping is rare, brief and non-recurring and that homelessness is routinely prevented through early and upstream prevention’.

The results show:

Our Vision: ‘Rough Sleeping is rare, brief and non-recurring and that homelessness is routinely prevented through early and upstream prevention’	Agree Fully	Agree Partially	Don’t agree at all
	66.9%	27.1%	5.9%

Respondents were asked if they had any further comments on the proposed vision.

25 respondents had further comments about the proposed vision. These have been categorised:

Category of Comment:	Number:
Positive/ Supportive Comment	5
Negative/Critical Comment	6
Comment highlighting need for more Support for Homeless Households	4
Response not relevant to question asked or Beyond the scope of this strategy	10
No Comment	93
<b>TOTAL:</b>	<b>118</b>

Sample Comments:

*I think we need to be more creative, using everything we have available to house those that need it rather than traditional routes.*

*Great vision & I agree that it is idealistic but there are entrenched rough sleepers that need wrap around support to get out of the cycle.*

*It will be difficult for homelessness to be rare, as few choose to be homeless. It can be reduced but not rare. Early Intervention starts a long way before becoming homeless and needs to be joined up with professionals working together.*

**Commentary:**

The Vision is overwhelmingly supported by respondents to the Survey. Only 5.9% of respondents don't agree at all with the vision. However, we are taking on board feedback that the vision is not aligned with the vision of the cross-county work undertaken by Campbell Tickell and will be amending the vision to mirror the Suffolk wide vision. The sentiment of the two visions is the same, just worded slightly differently.

There were 4 comments highlighting the need for wrap-a-round support for homeless households. We feel that this need is already addressed in the Delivery Plan, which supports the need for joined up working with other agencies who are the providers of support services.

**5. THE PRIORITIES**

Respondents were asked if they agreed fully, partially or not at all with the 5 priorities identified in the draft strategy.

The results show:

Do you agree that we need to focus on:	Agree Fully	Agree Partially	Don't Agree at all
Early, Upstream Prevention and Intervention	88.1%	11.9%	0%
Making Rough Sleeping rare, brief and non-recurring	91.5%	8.5%	0%
Ensuring that the health and wellbeing needs of households are met whilst in temporary accommodation.	91.5%	8.5%	0%
Continuing to improve access to the private rented sector by expanding and future proofing the Central Suffolk Lettings Service.	66.9%	28.8%	4.2%
Mitigating against the impacts of the cost of living.	75.4%	22.1%	2.5%

Respondents were asked if they thought there should be any other priorities in the strategy.

35 respondents answered this question with further comments. The comments have been categorized:

Category of Comment	Number
Comment addressed in BMSDC's Joint Homes and Housing Strategy	2
Comment addressed in the Homelessness Reduction and Rough Sleeping Strategy Delivery Plan	8
Comment beyond the scope of this Strategy	7
Comment is misinformed (See Section 7)	8

Comment is not relevant to the question asked	4
Comment is already happening in the work of Housing Solutions	6
No comment	83
<b>Total:</b>	<b>118</b>

**Sample Comments:**

*Safety. Protection. Showing homeless people someone cares about them.*

*I think we need to include strategic alignment to other services, we need to make best use of the skills and experience of partners.*

*Understanding the wider determinants that can impact a person's housing situation e.g.: debts, and other finance issues, poor housing conditions, etc.*

**Commentary:**

The survey results show that the 5 priorities of the draft Strategy are widely supported by respondents. Therefore, we are not making any changes to the 5 priorities. Any changes as a result of comments left, can be seen in Section 7: Comments, Questions and Myths.

**6. THE STRATEGY DOCUMENT**

Respondents were asked if they thought the draft Strategy was easy to understand & provides enough information.

The results show:

	Agree Fully	Agree Partially	Don't Agree at all
The Draft Strategy is easy to Understand	58.5%	37.3%	4.2%
The Draft Strategy provides enough information	55.9%	38.1%	5.9%

Respondents were asked if they had any other comments about the draft Homelessness Reduction and Rough Sleeping Strategy.

27 Respondents provided further comments. These have been categorized:

Category of Comment	Number
Positive/ Supportive Comment	4
Negative/ Critical Comment	1
Comment querying use of Jargon/ Definitions	6
Comment addressed in the Homelessness Reduction and Rough Sleeping Delivery Plan	4
Question or Query (See Section 7)	6
Comment is not relevant to the question asked	6
No comment	91
<b>Total:</b>	<b>118</b>

Sample Comments:

Commentary:

*I like the way the action plan very simply reflects the strategy.*

*Absolutely agree that the intentions of the strategy are the right ones, but I think the language needs some work to make sure it's accessible to all (early upstream prevention means nothing to anyone outside of the council) and I think the success of the delivery of the strategy will hinge on your willingness to work with other organisations in the districts.*

*I would like to stress the importance of supporting people with mental health problems, and also the people who support and care for them, as a key preventative measure. It is so easy for those who are unsupported to become homeless. This is aggravated by shortages in services for mental health needs in the community. This needs to be addressed urgently and effectively or else the vision will not be achieved.*

Notably there were 6 comments stating that there was too much jargon in the Strategy document. As a result, we have ensured there is no jargon in the document, any acronyms have been removed and simplified definitions have been added. Other changes/ amendments as a result of comments left, can be seen in Section 7: Comments, Questions and Myths.

7. COMMENTS, QUESTIONS & MYTHS

There were various questions asked in the 3 free text questions in the survey. There were also many statements about Homelessness and Housing Solutions that were not true. The following is a selection of comments, questions and myths and our response to these:

CONSULTATION COMMENT/QUESTION:	RESPONSE:
What does "upstream intervention" mean?	Upstream prevention focusses on high-risk groups, such as vulnerable young people and high-risk transitions, such as leaving prison, care, and hospital discharge.
More support needs to be put in place when people are facing homelessness - waiting until the date of homelessness is too late. Early cries for help need to be addressed faster to avoid worse and more costly situations.	We agree and this is why we formed the Early Intervention Team in June 2023; under statutory homelessness legislation we do not have to assist households at risk of homelessness until they are within 56 days of becoming homeless. At Babergh and Mid Suffolk we assist and advise anyone who contacts us with a view to preventing their homelessness prior to our statutory duty. We completed 25 preventions in April 2023 which went up to 46 at the end of June 2023 after the Early Intervention Team started working at this earlier stage in an applicant's homelessness journey.
There should be absolutely no reason for anyone to sleep rough and the local authorities need to provide adequate temporary accommodation and food for anyone who find themselves in this unfortunate position. This needs to be widely advertised so that anyone found in this position can be directed or taken to the provided facility.	Any individual contacting us who is rough sleeping in our districts will be accommodated regardless of meeting priority need under homelessness legislation, they will then be assessed under homelessness legislation and a decision made regarding which pathway is best to support them into settled accommodation. This will be our main housing pathway or a discretionary rough sleeper pathway. Referrals can be made into the rough sleeper service by using <a href="https://www.thestreetlink.org.uk">StreetLink - Connecting people sleeping rough to local services (thestreetlink.org.uk)</a>
Our preference would be a uniform Suffolk wide Vision as set out in the Campbell Tickell work – ‘That homelessness and rough sleeping in Suffolk is prevented wherever possible and, where it cannot be prevented, it is rare, brief and non-recurring.’ The priorities don’t appear to be fully aligned with aims/objectives of	We agree with the vision as set out in the Campbell Tickell report and will align our vision.

<p>Suffolk Housing Board or recent Campbell Tickell report.</p>	
<p>Look at the bidding system and where people need to be for their mental health and life reasons. For example, moving people from Ipswich to Stowmarket who don't want to move away from Ipswich because they HAVE to take the house isn't supporting the family. Either source more accommodation in the area or stop moving people from out of the area in. Have Temporary housing in areas that are close to support.</p>	<p>We always try to place households in temporary accommodation that is suitable for their needs, we would not move anyone from Ipswich as that household should be presenting to Ipswich Borough Council however, we are mindful that our districts border four neighbouring local authorities and at times we expect households to move areas according to where we have our temporary accommodation available at that time. We will always endeavour to move that household back to their area if possible.</p> <p>Babergh and Mid Suffolk have been tracking which areas our households present from and are completing forecasting work for the future, this will inform a temporary accommodation review later this year.</p>
<p>Identify underlying health or other issues that contribute towards individuals becoming homeless or rough sleeping and refer to or work with appropriate support organisations to try to address this.</p>	<p>All households will be referred to supporting agencies following an initial assessment and we always work with these agencies to ensure we offer a wraparound service of support to all applicants. We are aware that we can always do more and will complete a piece of work as identified in this strategy to strengthen working relationships with other agencies including third sector and voluntary agencies.</p>
<p>Residents in privately rented homes, struggling to meet increased rental payments, should be helped too. Especially if in a property too big for their needs, because this would free up properties for those who can afford them</p>	<p>Our homelessness service is tenure neutral which means that it does not matter what the tenure is in your home.</p> <p>Tenure describes who lives in the home and your relationship to the home.</p> <p>For instance,</p> <ul style="list-style-type: none"> <li>• If you own the home, you live in you're an 'owner occupier'</li> <li>• If you own the home but rent it out to someone else, you're a 'Landlord'</li> <li>• If you rent the home from someone else, you're a 'tenant'</li> </ul> <p>Our Financial Inclusion team are experts at maximising household incomes, budgeting advice and referring households for debt advice with our local Citizens Advice partners.</p>
<p>The draft strategy is all well and good, but it's not costed. It appears clear that other departments within the council who have a role to play may not have been consulted. This is more of a vision rather than a strategy.</p>	<p>The service is costed, and the budget already set from central government funding. Other council departments feed into our service:</p> <p>Communities – Assistance with our BEAM project through funding from UK Shared Prosperity Fund</p> <p>HR Incomes Team – Referrals into our Financial Inclusion Team to maximise income and avoid rent arrears.</p>



	<p>Tenancy Management – Joint working with households who may face homelessness due to tenancy breaches and fleeing violence or domestic abuse.</p> <p>Private Sector Housing – Referrals of unlawful evictions and prohibition orders</p> <p>Building Services – Decants while improvement work and adaptations are completed.</p> <p>Empty Homes – Working with Central Suffolk Lettings to assist landlords and homeowners let properties.</p> <p>This is not an exhaustive list, and we work alongside Strategic Housing and other internal teams which is presented in our Homes and Housing Strategy.</p>
<p>There is no priority where the allocation of housing is addressed. This should include affordability and access to hardship support. It should involve partners as part of the Customer Journey.</p>	<p>The Allocations Team complete affordability reports for each letting, if affordability is considered an issue, they will refer into our Financial Inclusion team for support.</p> <p>As part of the Gateway allocation of property is assessed under ‘Reasonable Preference’ and ‘Additional Preference’ – please see section 2.1 and 2.2 in our Allocations Policy Allocations Policy - July 2022 - HomeChoice (<a href="http://gatewaytohomechoice.org.uk">gatewaytohomechoice.org.uk</a>)</p>
<p>There is no clear identification of partners who would need to be involved in the customer journey particularly the voluntary sector.</p>	<p>Agreed, we will amend this in the Delivery Plan.</p>
<p>How will these hubs work? Mobile service? We are aware of other council departments already looking into the same so is this joined up?</p>	<p>We are working to establish how a ‘hub’ will work and what it will look like, this will be identified on the delivery plan. We have discussed a joined-up approach with other services.</p>
<p>You want to introduce a minimum standard of temporary accommodation for children but not adults?</p>	<p>We do not have children in temporary accommodation without parents so any minimum standard would extend to the whole household however we wish to improve the journey through temporary accommodation for children in the form of multi-agency working and supporting access to education, health, and socialisation.</p>
<p>Where will vulnerability be included as part of any decision making. Do you have Vulnerable Customer policy?</p>	<p>We complete vulnerability questionnaires for every individual presenting as homeless and their household, these are used to assess need, inform signposting, complete personal housing plans and used to consider suitable accommodation.</p>
<p>You mention 2 x 5 new HMOs in Needham Market, but have you consulted on this with the community? There were previous issues at that location, and this is sensitive which you should be aware of.</p>	<p>A planning application was submitted on 05/12/2022 and went through the correct consultation process that allowed for comments and objections from the public, the application was passed on 30/01/2023 following all comments taken into consideration by the case officer.</p>

<p>The lack of acknowledgement of the role of the voluntary sector in the customer journey is a concern as that consultation should have taken place before the draft strategy was produced.</p>	<p>An on-line survey with Stakeholders and Partners was completed as part of the Homelessness Review, and the findings from that Consultation Survey have fed into the development of this Strategy.</p>
<p>I've seen residents struggle to access support that is out there because it is very dispersed i.e. it comes from multiple different agencies, charities, community groups etc. Might it be helpful to have some simple, regularly updated info (online and in leaflets) about the key places to get support e.g. CAB, Warm Homes Suffolk, local food banks/community fridges, info on how to get travel to hospital reimbursed if you can't afford it - etc.</p>	<p>We recognise that access to timely information and advice is essential to helping our residents navigate the cost-of-living crisis. With many organisations offering different types of support, finding the help people need when they need it can be challenging.</p> <p>Our cost-of-living webpages contain a breakdown of the support available locally and nationally for housing costs, food and essentials, fuel and utilities, and to boost income, these pages are updated regularly to reflect changes in support.</p> <p>We are conscious that for people not online, accessing up to date information can be particularly difficult. We have worked with a number of partners to ensure information is available in non-digital formats, including cost of living leaflets for both Babergh and Mid Suffolk, as well as 'worrying about money' leaflets produced with the Independent Food Aid Network, which help residents to identify solutions to money problems and promote the organisations best placed to support. We have also worked with parish publications to share information about the support available in local newsletters and noticeboards, in order to reach people at a local level.</p>

**8. ALL -MEMBER BRIEFING SESSIONS**

During the Consultation period 4 All-Member Briefing sessions were held, to formerly present the Strategy to Members and to answer questions.

The following details the questions that were asked and our responses:

QUESTION:	RESPONSE:
<p>How Different is the new Strategy to the old Strategy?</p>	<p>The new Strategy puts ‘Early Intervention’ at the start and is the foundation that supports the strategy and the ethos that runs throughout the strategy. We want to support residents before they get to crisis point by encouraging them to contact us at the earliest stage. We don’t won’t to wait for a ‘statutory trigger’ to apply before we can offer assistance. The new strategy will be a ‘live’ document, meaning that it can respond to change quickly if it needs to. It will be reviewed regularly to ensure that it remains reflective of current challenges.</p>
<p>Have the reasons for homelessness changed since the last strategy?</p>	<p>The main reasons for homelessness continue to be Section 21 Notices and being asked to leave accommodation by friends or family.</p>
<p>What percentage of homelessness presentations are from ex-service personnel?</p>	<p>We have very few homelessness presentations from those who are serving or have served in HM Forces: between 1st April 2019 – 31st January 2024:</p> <ul style="list-style-type: none"> <li>• Babergh – 13 (0.4% of all homeless applications taken during this period)</li> <li>• Mid Suffolk – 18 (0.6% of all homeless applications taken during this period)</li> </ul>
<p>Are we identifying those at risk of homelessness or are we waiting for them to contact us?</p>	<p>An initial contact from a household triggers assistance. We are waiting for the Low-Income Family Tracker (LIFT) to assist with being more proactive.</p>
<p>What is the split in homelessness presentations between Council, Private and Housing Association tenants?</p>	<p>We have very low level of evictions from BMSDC tenancies, as we work closely with the in-house Financial Inclusion Officers to ensure that tenants with rent arrears are assisted. Provide Registered Providers have a ‘duty to refer’ to us when tenants are at risk of homelessness. It is harder to work with tenants of private landlords as there is no ‘duty to refer.’</p> <p>Between the 1st April 2019 and 31<sup>st</sup> January 2024, there were 3222 homeless applications in Babergh; of these only 1904 provide a reason for homelessness: 26% of these were recorded as due to the end of a Private Tenancy; 8% due to the end of a Council Tenancy and 2% for the end of a Registered Provider Tenancy.</p>

	For the same period of time in Mid Suffolk, there were 2884 homeless applications, of these 1661 gave a reason for homelessness: 25% of these were recorded as due to the end of a Private Tenancy; 5% due to the end of a Council Tenancy and 3% for the end of a Registered Provider Tenancy.
What can Councillors do to help and support this work?	Help to communicate the services that we offer. Refer people to us who are in need of assistance, at the earliest opportunity. Highlight that our advice service is 'tenure neutral'
How do we manage Rough Sleepers that don't want to accept the help that is on offer?	We will keep working with rough sleepers and offering them assistance until they chose to accept assistance. Building relationship and trust is key when working with rough sleepers.
What are we doing to help residents who are struggling with their mortgage repayments?	Housing Advice provided by BMSDC is free and tenure neutral. The early intervention team can offer housing advice and make referrals to CAB and third sector partners. We would ensure that they are taking to their mortgage providers.
What are we doing to help those that are under occupying to move to more suitable accommodation?	There is additional priority in the allocation policy for tenants who are wishing to downsize to more suitable accommodation. We are considering how we can best support residents through the process and are considering getting feedback from those that have already been through the process. We do have a budget to offer an incentive for downsizing but we are also going to consider what else we can offer as an incentive.
Does most of the demand come from market towns or from other areas?	Yes, most of the demand for our services is coming from our market towns.
How often will the Strategy be reviewed?	The Strategy and Delivery Plan will be reviewed once a quarter but can be reviewed sooner if something urgent occurs.
Are any of those currently in temporary accommodation housed by Central Suffolk Lettings?	No, all temporary accommodation is our own stock, or the Cedars Hotel or run by Sanctuary Housing (1 unit)
Do we need more temporary accommodation?	We don't necessarily need more temporary accommodation, we need to look more closely at what we have, where it is, is it suitable and then compare that to our statistics over the last couple of years of households in TA to try and forecast need for the future.
How aware are we of people who are 'sofa surfing' and at risk of homelessness?	Tenancy Support Officers in the Rough Sleeping Team are aware of and assist previous rough sleepers who are known to be at risk of homelessness. Financial Inclusion Officers can also assist once an individual has been identified as at risk of homelessness.
What has been the cost of using The Cedars Hotel for the past 12 months?	This information has been provided to members.
Is there on-going work re: County-wide Homelessness Strategy for Suffolk?	Yes, districts and boroughs are working together to consider an over-arching homelessness strategy for Suffolk.

**How has this consultation been promoted?**

Sessions have also taken place with CAB and the Tenant Board. The Survey has been sent direct to Partners and Stakeholders, all households registered for housing on Gateway to Homechoice, All BMSDC tenants registered for the 'My Home Bulletin' and is on both the Babergh and Mid Suffolk websites. It has also been promoted through X (formerly Twitter), Facebook and LinkedIn.

**9. TENANT BOARD MEETING**

During the Consultation Period, the Strategy was formerly presented to BMSDC’s Tenant Board.

The following details the questions that were raised and our responses:

QUESTION:	RESPONSE:
<p>How do rough sleepers get a referral for help? Is it more chance or accident? How would they know about it?</p>	<p>There is a service called Street Link, <a href="http://thestreetlink.org.uk">StreetLink - Connecting people sleeping rough to local services (thestreetlink.org.uk)</a> if anybody sees a rough sleeper, they can report this, and they will forward it to the relevant local Council.</p> <p>There are also Rough Sleeper workers, who walk around our districts and find rough sleepers in areas that we know they usually are. e.g. places they can find warmth.</p> <p>We also can be contacted by Community Wardens.</p> <p>We accommodate people at any time all year round, not just in severe weather.</p> <p>There is also the rough sleeper inbox which is advertised on our website along with street link and Advice Aid. Advice Aid gives a lot of help and advice, and links into our service so if you can’t find a resolution you can come through to us.</p>
<p>Do you have any negative cases, and how do we learn from this?</p>	<p>We do occasionally have some “negative cases”, for example we have people who panic in accommodation having had a period of rough sleeping. It is about trying to work with people to get over those barriers. We will always use these cases as a learning opportunity on how we can do better so can we really call them negative.</p>
<p>Because of the government funding, do you feel that you have a challenge on taking on the full responsibility to tackle homelessness?</p>	<p>We are working with the Department for Levelling Up, Communities and Housing on their road shows next year. We have an advisor who spends the day with us every quarter and gives us a lot of positive feedback about our service. There has been a recent homelessness summit organised by Eastbourne DC and many D’s and Bs sent an open letter to central government regarding the Local Housing Allowance (LHA) rates, and we were asked to send our statistics in with the letter to showcase the challenges we face. Yes, we do have challenges, but we are not alone and also receive the praise we deserve.</p>
<p>Do we advertise the Anglian water Social Tariff?</p>	<p>Theres a lot of Cost-of-Living Support information that we should be advertising better.</p>

**10. MEETING WITH CITIZENS ADVICE BUREAU**

As a key partner, and at the request of Mid Suffolk CAB, a separate session was held with 2 representatives, so that they could provide more in-depth feedback on the Strategy and Delivery Plan. The following is the key points raised and discussed and our response:

QUESTION/COMMENT:	RESPONSE:
<p>When you are establishing the team processes and the links to other in-house teams, we would like CAB to be included in that conversation in order to be able to make the best contribution we can to playing our part in supporting early intervention.</p>	<p>We will amend the Delivery Plan, to ensure that CAB are named specifically in the action around establishing team processes and links to in-house teams.</p>
<p>“Setting up Protocols with other agencies to formalise early-intervention multi agency arrangements with Probation, Prisons, Hospitals, Adult Care Services and Childrens and Young Peoples services to work collaboratively and prevent homelessness for our most vulnerable residents.” We think this should recognise that the VCSFE sector has a role and suggest including VCSFE partners in the list of agencies that you will work with collaboratively to prevent homelessness.</p>	<p>We will not be including VCSFE partners In this action as this is regarding statutory duties.</p>
<p>We recognise that the idea for Early Intervention Hubs and a mobile customer access point is at an early stage. We suggest these will be most effective where they are integrated with other services where those services are best placed to meet client needs. As a local Citizens Advice, we believe we could play a useful role in early intervention and if we can be involved in the development of the</p>	<p>We are in the early stages of this piece of work and need to look at the viability of the project first. Initially the Early Intervention Hubs and a mobile customer access point will be to administer our statutory duties, as the strategy evolves, we may look at key partner involvement. We will not be making any changes to this action, at this point.</p>

<p>proposals, we can best work out how we can help.</p>	
<p>There is an action about improving the use of testimonials from people in Temporary Accommodation. We suggest that this should be a two-stage process, where the first stage is adding the testimonials and virtual tours and there is a second stage where the team could look at next steps for using testimonials and lived experience for business improvement.</p>	<p>We already use client feedback and exit surveys to inform our service, ensure best practice and underpin business improvement. This action would be requesting permissions from those clients to use their testimonials and virtual tours on our website and information for households facing homelessness.</p>
<p>Your page on “what we have already achieved” for health and wellbeing could include the fact that the council has joined the Suffolk Information Partnership to improve referral routes into community support that improves health and wellbeing. Under “what we will be doing next” we suggest that the strategy mentions that you are “engaging with the Suffolk Information Partnership and other referral routes to continue to improve access to community support for health and wellbeing.”</p>	<p>We will add reference to the Suffolk Information Partnership in the ‘what we have already achieved’ section but we will not be including it in the ‘what we will be doing next’ section, as we consider this work to have become ‘business as usual.’</p>
<p>Under Priority 5 – Mitigating against the impacts of the cost of living you mention food security. As a local Citizens Advice, we think there’s a risk that going forward food banks may not be able to meet demand following the end of the Household Support Fund in 2024. The Babergh &amp; Mid Suffolk District Council Homelessness Review: 2023 recognises that the council regularly refers to food banks as part of its operations. Your current plan includes the long-term action of “Taking part</p>	<p>We are confident that this work is taking place elsewhere within the Council and does not sit within the remit of the Homeless Reduction and Rough Sleeping Strategy. Therefore, we will not be making any changes to the original action.</p>



<p>in the development of a Food security plan for Suffolk alongside Community Action Suffolk. “ We recommend adding a short-term action that would make it clear who was responsible for initiating or co-ordinating a response should any of the food banks reduce their operations or close, in addition to the action on the food sustainability project. We would suggest this action be revised to read as follows: “Liaising with the food sustainability project to ensure that Housing Teams are able to respond to short term issues in emergency food provision. Taking part in the development of a Food security plan for Suffolk alongside Community Action Suffolk”.</p>	
<p>The survey of Stakeholders and Partners as part of the Homelessness Review asked whether there was an appetite to be part of a Homelessness Forum; 100% of respondents stated that they would be happy to proactively be part of such a forum with concerns raised over data sharing agreements that would need to be managed. The forum is not in the Homelessness Reduction and Rough Sleeping Strategy or the Delivery plan. We suggest that it should be explicitly mentioned in the strategy and the delivery plan should indicate who is going to plan and deliver it.</p>	<p>An action has been added to the Delivery Plan and has been referenced in the Strategy Document.</p>
<p>We recommend that the council should consider piloting furnished tenancies. There’s a lot of evidence from End Furniture Poverty that it benefits both the landlord and the tenants, and we believe that the Housing Transformation Manager is reviewing the</p>	<p>This suggestion is beyond the scope and remit of the Homelessness Reduction and Rough Sleeping Strategy. Resettlement Officers currently assist households moving on from Temporary Accommodation with sourcing furniture and white goods by utilising the Local Welfare Assistance Service (LWAS), Furniture Projects and Charities, etc. Due to budgetary constraints it will be difficult to progress with a pilot at this time.</p>

<p>evidence. This would involve introducing a service charge to cover the cost of the furniture, void loss, cost of replacement furniture for theft or wear and tear, any miscellaneous work and administration costs of the scheme.</p> <p>Since this work is in progress already, we would recommend putting an action under Priority 5 – Mitigate against the impact of the cost of living. The action could read “review the potential for piloting furnished tenancies to prevent tenants going into debt to furnish their properties and improve tenancy sustainment.”</p>	
<p>What options do households in temporary accommodation have for washing their clothes?</p>	<p>The Temporary Accommodation manager will ensure that all households going through TA are made aware of their nearest laundry facilities.</p>
<p>Is there a ‘moving checklist’ or similar to ensure that households are aware of the potential cost of moving?</p>	<p>Households in Temporary Accommodation are assisted by Resettlement Officers when they are rehoused from Temporary Accommodation. We could consider introducing something to help those moving via general allocations and lettings from the Housing Register.</p>

**11. RESPONSES FROM MEMBERS OF THE PUBLIC WITH LIVED EXPERIENCE OF HOMELESSNESS/ ROUGH SLEEPING OR EXPERIENCE OF BEING THREATENED WITH HOMELESSNESS/ ROUGH SLEEPING**

One of the key aspects of this consultation exercise was to capture the voice and the views of people with experience of homelessness/rough sleeping and experience of being threatened with homelessness/rough sleeping.

The survey was completed by 18 people with this experience. That equates to 15.3% of all respondents to the survey.

We have analysed responses from this cohort separately. This shows:

**The Vision:**

Our Vision: 'Rough Sleeping is rare, brief and non-recurring and that homelessness is routinely prevented through early and upstream prevention'	Agree Fully	Agree Partially	Don't agree at all
	50% (9 people)	16.6% (3 people)	33.3% (6 people)

There is a high percentage of people who don't agree with the vision of the Strategy. Of the 6 people who don't agree with the vision, 5 left a further comment:

Comment:	Response:
<p>Mental health must be taken into consideration especially for people with PTSD. Council staff needs to be much more aware &amp; trained in dealing with PTSD &amp; provisions must be made for people who are being made homeless who have animals with them. Currently single people with no children who have animals are treated appallingly with no care or compassion. More support needs to be put in place when people are facing homelessness - waiting until the date they're homeless is too late.</p>	<p>For every household that presents as homeless we complete an assessment of need for all household members, and we will signpost and refer to the appropriate agency or support group if a need is identified.</p> <p>Housing Solutions staff are not trained in dealing with individuals with mental health issues or suffering with PTSD and will always refer to the correct agency, however we are trained in how to identify these issues and work with supporting agencies to manage any issues.</p> <p>We provide temporary accommodation for those single and family households who present as homeless with animals.</p> <p>We assess need at prevention stage of the homelessness journey and aim to sign post and refer to appropriate agencies before households become homeless.</p>

A lot of young people who don't have the best relationships with their parents sleep rough.	We work with young people and parents who have asked them to leave home at an early stage and can offer support and advice around a more planned approach to rehousing. We try to reconnect rough sleepers with family and friends as well as accommodating them in our specialist units.
Males are forced to sofa surf because they are not priority and don't have children with them.	All single males are assessed in line with homelessness legislation regarding priority need.
The vision was created prior to covid 19 lockdowns and the cost-of-living crisis. It needs updating or changing completely. The world as we know it is collapsing, hence a new vision must be imagined as a matter of urgency. The vision simply no longer applies and therefore will not prevent homelessness.	The last strategy was written in 2019 and ends this March 2024, the new strategy April 2024 has a new vision and takes into consideration the cost-of-living crisis and recovery from the pandemic.
You don't help the vulnerable.	We class everyone approaching us as homeless as being vulnerable due to their housing crisis, we then assess and consider how we can support that individual to be rehoused.

**The Priorities:**

Do you agree that we need to focus on:	Agree Fully	Agree Partially	Don't Agree at all
Early, Upstream Prevention and Intervention	94% (17 people)	6% (1 person)	0%
Making Rough Sleeping rare, brief and non-recurring	100% (18 people)	0%	0%
Ensuring that the health and wellbeing needs of households are met whilst in temporary accommodation.	94% (17 people)	6% (1 person)	0%
Continuing to improve access to the private rented sector by expanding and future proofing the Central Suffolk Lettings Service.	61% (11 people)	28% (5 people)	11% (2 people)

Mitigating against the impacts of the cost of living?	66% (12 people)	28% (5 people)	6% (1 person)
---	--------------------	-------------------	------------------

These results show that there is overwhelming support for the 5 priorities identified in the draft Strategy. These results are very similar to the results when looking at *all* responses to the survey. We are not making any amendments to the 5 priorities.

**The Strategy:**

	Agree Fully	Agree Partially	Don't Agree at all
The Draft Strategy is easy to Understand	33% (6 people)	66% (12 people)	0%
The Draft Strategy provides enough information	28% (5 people)	61% (11 people)	11% (2 people)

We have removed all jargon, acronyms and added definitions to the Strategy Document.

12. SUMMARY OF CHANGES MADE TO THE STRATEGY AND DELIVERY PLAN AS A RESULT OF CONSULTATION FEEDBACK

You said:	We have:
<p>The BMSDC Vision is “Rough sleeping is rare, brief and non-recurring and homelessness is routinely prevented through early and upstream intervention”. Our preference would be a uniform Suffolk wide Vision as set out by the work in the Campbell Tickell work – ‘That homelessness and rough sleeping in Suffolk is prevented wherever possible and, where it cannot be prevented, it is rare, brief and non-recurring.’</p>	<p>We have changed the vision to the Suffolk Wide vision as set out in the Campbel Tickell Report, this is so we are more closely aligned with any future Suffolk Wide Homelessness Strategy.</p> <p>“Homelessness and rough sleeping is prevented wherever possible and, where it cannot be prevented, it is rare, brief and non-recurring.”</p>
<p>There were several comments that the Strategy was full of jargon and difficult to understand.</p>	<p>We have ensured that there is no jargon in the document, we have added definitions and explanations to technical terms and we have ensured that there are no acronyms in the Strategy.</p>
<p>CAB would like to be included in the conversation re: establishing team processes and links to in-house teams; in order to be able to contribute to supporting early intervention work.</p>	<p>We have amended an action in the Delivery Plan to specifically name CAB. The action is now, ‘Establish team processes and links to in house teams especially the Financial Inclusion Team and Central Suffolk Lettings, statutory and third sector agencies particularly <i>Citizens Advice</i> to complement service delivery’</p>
<p>There is no reference to the Suffolk Information Partnership.</p>	<p>We have added reference to the Suffolk Information Partnership in the ‘what we have already achieved section’ of Priority 3: Ensuring the health and wellbeing needs of households are met whilst in temporary accommodation: Joined the Suffolk Information Partnership to improve referral routes into community support to contribute to improving health and wellbeing.</p>

<p>The survey of partners and stakeholders as part of the Homelessness Review showed 100% of respondents would like to be part of a BMSDC Homelessness Forum but this is not in the Strategy or Delivery Plan.</p>	<p>We have added an action to the Delivery Plan and have referenced this in the Strategy Document. The action is, 'Establish a Housing Forum to promote co-ordination and co-operation with partners.'</p>
--	--

# Agenda Item 12

## MID SUFFOLK DISTRICT COUNCIL

<b>TO:</b> Council	<b>REPORT NUMBER:</b> <b>MC/23/47</b>
<b>FROM:</b> Head of Electoral Services and Land Charges	<b>DATE OF MEETING:</b> 20 March 2024

### COMMUNITY GOVERNANCE REVIEW – BATTISFORD AND COMBS

#### 1. PURPOSE OF REPORT

- 1.1 The Council is asked to adopt the final recommendations of the Community Governance Review Working Group (CGRWG) and publish the recommendations for final comments of the Battisford and Combs Community Governance Review (CGR).

#### 2. OPTIONS CONSIDERED

- 2.1 This is a statutory duty of the Council, as such the Council must bring the review to conclusion.

#### 3. RECOMMENDATIONS

- 3.1 To adopt the final recommendations of the Community Governance Review Working Group, as set out in Appendix A.
- 3.2 To note the results of the further consultation, as reported in Appendix B.
- 3.3 To publish the Council's recommendations and reasons to allow a period for final comments before a decision is taken by Council.

#### REASON FOR DECISION

To ensure that the community governance reflects the identities and interests of the community and is effective and convenient.

#### 4. KEY INFORMATION

- 4.1 The Monitoring Officer was authorised by Council on 26 January 2023 to conduct a part two review to a Community Governance Review with the CGRWG on from part one of the district-wide review. The basis of part two is built upon the previous request to the District Council by Battisford Parish Council and the need for further consultation on the matter as a requirement from the LGBCE.
- 4.2 The initial CGRWG met on 19 April 2023 when a timetable for the review and Terms of Reference were agreed.
- 4.3 Following the May 2023 Elections, the Council delegated consideration of the CGR to the cross-party CGRWG, which comprised of Cllr Anders Linder, Cllr Janet Pearson, Cllr Rowland Warboys and Cllr Adrienne Marriott. Councillors were appointed on the basis of having no vested interests in the areas under review and reaffirmed the Terms of Reference on 16 June 2023.



- 4.4 The review commenced on 26 July 2023 and emails were sent to all interested parties, local District and County councillors and Suffolk County Council.
- 4.5 The CGRWG met on 27 September 2023, to consider all the responses and full Council approved the recommendations to open further consultations on the basis of the materials and information provided.
- 4.6 The CGRWG's draft recommendations were presented to full Council on 26 October 2023, where full Council approved for the CGRWG to undertake further consultation on the basis of their draft recommendations. The recommendations were then published on 10 November 2023, and emailed to all interested parties and businesses. In addition, although not a legislative requirement, an information pack containing the map, questionnaire and explanatory letter was sent to all households in the Battisford and Combs areas.
- 4.7 The initial consultation was set to end on 22 December 2023. A request from the District Councillor for Onehouse was approved by the CGRWG for an extension to the consultation up until 10 January 2024, to ensure maximum participation from stakeholders.
- 4.8 The CGRWG met on 22 January 2024 to consider the responses to the consultation and make their final recommendations. It was agreed that the CGR further consultation report would be published ahead of the report to full Council for purposes of transparency to all interested parties.

## **5. LINKS TO OUR PLAN FOR MID SUFFOLK PLAN**

- 5.1 The Review is linked to the Communities outcomes in the Corporate Plan as an effective Community Governance Structure enables communities to be "engaged in decision making,"

## **6. FINANCIAL IMPLICATIONS**

- 6.1 The costs of conducting a CGR must be borne by the District Council however, there are limited financial implications associated with this review. The sole costs of the review are the expenses incurred by undertaking public consultation, i.e. printing and postage.

## **7. LEGAL IMPLICATIONS**

- 7.1 Principal Councils (which includes District Councils) have a responsibility to undertake Community Governance Reviews and can decide whether to give effect to recommendations made in those reviews, except any consequential recommendations relating to alterations of electoral areas require approval of, and implementation by the Local Government Boundary Commission for England (LGBCE).
- 7.2 In relation to consequential changes to district ward boundaries, the LGBCE will want to see that specific consultation has been undertaken on ward boundaries as well as the Parish boundaries themselves. The LGBCE can only accept or reject all the requested related alterations. Accordingly, if there are changes to ward boundaries which are likely to have a significant impact on the electoral equality of the affected district wards, the LGBCE may not support these.

- 7.3 At this stage there is a legitimate expectation that the review will be taken to its natural conclusion. The Council may breach its statutory duties under the Local Government and Public Involvement in Health Act 2007 should the review not be carried to completion.
- 7.4 It should be noted that the period of 12 months only applies to Community Governance Reviews undertaken in response to petition or application and thus no fixed timeframe applies to the current district wide CGR.
- 7.5 If, at the conclusion of the review, the Council decides to alter any parish boundary or electoral arrangements, a Community Governance Order will need to be made to effect the change. This order will be drafted by the Council's legal team.

## 8. RISK MANAGEMENT

- 8.1 Key risks are set out below:

Key Risk Description	Likelihood 1-4	Impact 1-4	Key Mitigation Measures	Risk Register and Reference*
A challenge to the process may result in judicial review.	1	2	Legal Advice sought to assess the possibility of a successful challenge. Officers to ensure CGR processes align to statutory requirements	SR022

*\*Name of risk register where risk is currently documented and being actively managed and it's reference number*

## 9. CONSULTATIONS

- 9.1 The Community Governance Review process was undertaken in accordance with the agreed terms of reference and associated guidance. It included a second further consultation which sought the views of the Public. Links to the responses received during the consultation period can be found within the report in Appendix B.
- 9.2 The parish electoral arrangements of Battisford/Combs are protected until July 2027 as a consequence of the Suffolk County review. Therefore, any changes to the parish electoral arrangements of either parish before those dates would require LGBCE consent.

## 10. EQUALITY ANALYSIS

- 10.1 Equality monitoring from the consultation can be found within the Consultation Report in Appendix B.
- 10.2 An Equality Impact Assessment can be found in Appendix C.

**11. ENVIRONMENTAL IMPLICATIONS**

11.1 There are no environmental implications.

**12. APPENDICES**

Title	Location
(a) Final Recommendations of the CGRWG – Battisford and Combs	Attached
(b) CGR Further Consultation Report for Battisford and Combs	Attached
(c) EQIA Community Governance Review	Attached

**13. BACKGROUND DOCUMENTS**

13.1 No additional documents

**14. REPORT AUTHORS**

14.1 Patrick Richardson-Todd, Governance Support Officer

# Community Governance Review

## Final Recommendations

### February 2024

---

Battisford and Combs

We are committed to the principles of fairness and respect at  
Babergh and Mid Suffolk District Councils

Document Owner: Directorate  
of Law & Governance  
Community Governance  
Version: 1  
Date: 12 March 2024

## Contents

1. The Review.....	3
1.1. When to undertake a Community Governance Review.....	3
1.2. Community Governance Review Requirements.....	3
1.3. The purpose of a review.....	3
1.4. The Scope of a review.....	3
1.5. Authority within a review.....	4
1.6. The Current Review.....	4
1.7. Legislative obligation for public consultation.....	4
1.8. Community Governance Review Summary Timeline.....	5
1.9. Consultations within the current review.....	5
1.10. Consultation turnouts.....	6
1.11. The Draft Recommendations.....	7
1.12. Submissions/Comments.....	8
2. Current Arrangements and History of the area.....	8
2.1. Current arrangements.....	8
2.2. Relevant history.....	9
3. Assessment of Submissions.....	9
4. Statutory Criteria.....	11
5. Final Assessment and Final Recommendations.....	11
5.1. Assessment.....	11
5.2. The Final Recommendations.....	12
6. Consequential Matters & Next Steps.....	13
6.3. Assets and Precept.....	13
6.4. Local Government Boundary Commission for England (LGBCE).....	14
6.5. Electoral Matters.....	14
6.6. Consequential Matters.....	14
7. Contact Details.....	15
8. Legal Advice.....	15
Appendix 1. Methodology.....	16
Appendix 2. Questionnaire.....	17

# 1. The Review

## 1.1. When to undertake a Community Governance Review

Under the Local Government and Public Involvement in Health Act 2007, District Councils have a responsibility to undertake Community Governance Reviews.

### The Council

- has a duty to conduct a district-wide review every 10-15 years.
- must respond to a request e.g. from a Parish Council
- must be undertaken in response to a Community Governance Application from a “neighbourhood forum”.
- must be undertaken in response to a valid Community Governance Petition.

## 1.2. Community Governance Review Requirements

Petition Area	Required Signatories
< 500 electors	At least 37.5% of the electors
500 - 2,499 electors	At least 187 electors
> 2,500 electors	At least 7.5% of the electors

## 1.3. The purpose of a review

The purpose of reviewing community governance arrangements is to ensure they continue to reflect the identity and interests of local communities and are as effective and convenient as possible.

## 1.4. The Scope of a review

Community Governance Reviews can cover the whole structure of the parishes in a local authority, or have a narrower focus, for example, councillor numbers in a particular parish. They can recommend creating new parishes, amend existing

parishes, name them, establish parish councils, and make electoral arrangements. They can also make recommendations about grouping or de-grouping parishes.

### 1.5. Authority within a review

The Council can decide whether to give effect to recommendations made in these reviews save that any consequential recommendations for related alterations to the electoral areas that require approval of, and implementation by, the Local Government Boundary Commission for England (LGBCE).

### 1.6. The Current Review

Mid Suffolk District Council agreed to conduct this stage of the review at full council on 26 January 2023. The report and the legal basis on which the review is conducted, along with the terms of reference for this review can be found by following the below links:

- [Mid Suffolk Council CGR Report 26 January 2023](#)
- [Mid Suffolk Council CGR Report 26 October 2023](#)
- [Terms of Reference Community Governance Review 2023](#)

Or via the Community Governance Review webpage: [www.midsuffolk.gov](http://www.midsuffolk.gov)

The Council resolved that:

- That Council agree the recommendations in [Appendix A](#).
- To agree the Future Reviews detailed in [Appendix B](#).

The Council agreed to conduct a further review for Battisford and Combs, and Onehouse and Stowmarket in light of the previous insufficient timescale and requirement by the Local Government Boundary Commission for England (LGBCE) for a level of public consultation to be able to consider the changes requested.

### 1.7. Legislative obligation for public consultation

The 2007 Act requires that local people are consulted during a community governance review, that representations received in connection with the review are taken into account and that steps are taken to notify them of the outcomes of such reviews including any decisions.

Where proposals for related alterations are submitted to the Local Government Boundary Commission for England (LGBCE), it will expect to receive evidence that the Council has consulted on the public as part of a community governance review and the details of the outcome of that review.

Further guidance on Community Governance Reviews may be found at the [gov.uk](https://www.gov.uk) site.

### 1.8. Community Governance Review Summary Timeline

Timeline	Action
July 2023 to September 2023	Initial Consultation
September 2023	Considerations of responses and drafting of recommendations
November 2023 to January 2024	Further Consultation on draft recommendations
January 2024 to February 2024	Formulation of final recommendations and publication of consultation results.
20 March 2024	Final recommendations to be considered by Council with resolution to make a re-organisation order (as necessary)
As soon as practicable	Publish final recommendations and make re-organisation order as necessary

### 1.9. Consultations within the current review

The review conducted a new initial consultation, held between July and September 2023. This was held with all former stakeholders from the initial consultation, including the Parishes, Town, MP, Suffolk County Council, District Councillors, and open for any additional public responses for the period.

Council met on 26<sup>th</sup> October 2023 and agreed for the further consultation to take place based upon the draft recommendations of the Working Group. The further consultation was initially to run from November 10<sup>th</sup> until 22<sup>nd</sup> December, but this was extended to 10<sup>th</sup> January due to unforeseen delays with the print service which was not able to dispatch the last of the information packs until 15<sup>th</sup> November.









In regard to national legislation, the Council is under no obligation to provide printed copies to residences, however, this method of engagement was chosen and supported by full Council to encourage a high level of response.

The final turnout of the Battsford and Combs further consultation was 140 responses. This accounts for 21.98% of all households within the two areas concerned within this Community Governance Review.

### 1.10. Consultation turnouts

To understand the turnout figures received during the further consultation period regard was paid to previous Community Governance Reviews in other Council areas. The list is not exhaustive and does not exclude the possibility of other Community Governance Reviews past or future exceeding figures shown within the table below. However, it can be noted that Community Governance Reviews do not typically receive a high level of engagement. Additionally, Community Governance Reviews will yield a higher turnout when the areas in question are smaller parishes, rather than larger Towns.

Council	Links	Household number	Response	Rate	Comments
 Dorset Council	<a href="#">Dorset Council for Bridport Town Council</a>	~6360	151	<b>2.37%</b>	Overwhelming, Significant, Exception level of support
 MID SUSSEX DISTRICT COUNCIL	<a href="#">Mid Sussex for Burgess Hill Town</a>	12300	89	<b>0.72%</b>	Appreciable number
 NORTH YORKSHIRE COUNCIL	<a href="#">North Yorkshire for Scarborough</a>	8913	538	<b>6%</b>	-
	<a href="#">North Yorkshire for Eastfield</a>	3,126	151	<b>4.83%</b>	-
 Mid Suffolk DISTRICT	Mid Suffolk District Council for Battsford and Combs	596	140	<b>21.98%</b>	-
 Chelmsford City Council	<a href="#">Chelmsford City Council for Chelmsford Community Gardens</a>	~10,000	262	<b>2.62%</b>	-
 West Suffolk Council	<a href="#">West Suffolk District Council District Wide</a>	~180000	106	<b>0.06%</b>	-

The Working Group is satisfied with the level of consultations received within the consultation period to support the recommendations set out on October 26<sup>th</sup>, 2023. Turnout also lends secondary reasoning to send physical copies out based on the draft recommendations, as evidence suggests that residents respond better to questions revolving around intended action.

### 1.11. The Draft Recommendations

Name of Parish/Town Council	Number of Members	Number of Electors	Recommendations/ Reasons for Recommendation
<b>Battsford Parish Council</b>	474	7	1. Proposed inclusion of Bowl Meadow Development currently in Comb Parish Council area to be included within the Battsford Parish area.
<b>Combs Parish Council</b>	614	7	2. Dwellings along Bildeston Road to be re-allocated from the Combs Parish Council area.
Draft Recommendations:			
1. Council is asked to agree that the boundary between Combs Parish Council and Battsford Parish Council is amended as indicated on the attached Plan to include the Bowl Meadow Development.			
2. Council is asked to agree that the Bildeston Road remain as part of Combs Parish Council - No change.			
Reasons for Recommendation:			
1. Local preference (the proposal was supported by Battsford PC and not opposed by Comb PC on the basis that it made logical sense but that the electors should decide.			
2. The Bildeston Road dwellings are long standing existing dwellings which already identify with Combs Parish Council.			

The review afforded residents three opportunities to have their say on the boundary review. The stage 1 consultation was sent to all legislative stakeholders and a [public notice](#) was placed on the BMSDC noticeboard as well as on the Council website for any public response, and for any entity to diffuse and encourage participation. A new stage 1 was conducted in the part two review, followed by a stage 2 further consultation which featured physical information packs sent out to all affected households, as well as placed on the website for access and emailed to all legislative stakeholders.

Whilst both stage one consultations as well as a site visit formed the basis for the draft recommendations, the outcome and reliability of the stage 2 further consultation was taken into account by the Working Group to constitute the final recommendations to Council.

### 1.12. Submissions/Comments

During the stage 1 consultation of the current review for Battisford and Combs:

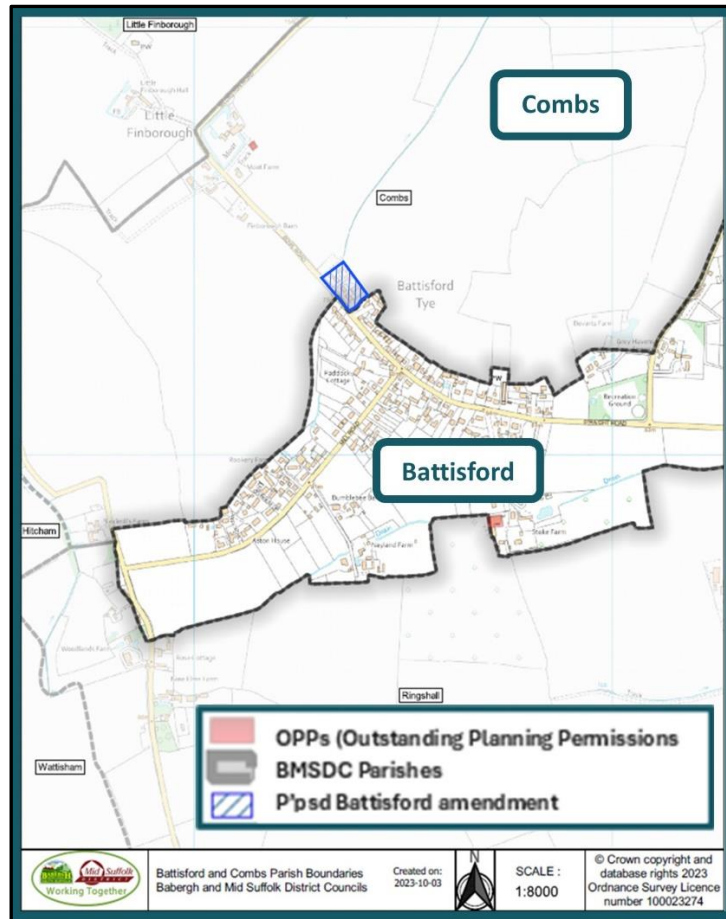
Battisford Parish Council - Clerk

Combs Parish Council - Clerk

## 2. Current Arrangements and History of the area

### 2.1. Current arrangements

The images below show the map used during the review, an ordinance survey map with the hatched lettered areas displaying the areas of interest within the review. The black dotted line highlights the existing parish/town boundary. To the north is the Parish of Combs and to the south is the Parish of Battisford. This map was provided to all households with their information pack at the beginning of the further consultation.



Map 1. Ordinance Survey

Parish	Electorate (Oct 2023)	Households (Nov 2023)	Councillors
Battisford	474	254	7
Combs	614	342	7
<b>Totals:</b>	<b>1088</b>	<b>596</b>	<b>14</b>

### 2.2. Relevant history

The Bowl Meadow development is a new residential area; therefore, no historical elements are present. However, it has been raised that traditional access to the Punch Bowl Inn is through the bowl meadow development.

## 3. Assessment of Submissions

A summary of the further consultation report is noted within this report, whilst the full report can be found in the accompanying appendices and on the [Community Governance Review website](#).

## Recommendation 1

- It was found that 88.57% (124) of respondents were in favour of recommendation 1 the draft to move the Bowl Meadow development in Battisford. 70 of these respondents qualified their response as logical sense, and 49 of these respondents' cited proximity.
- It was found that 5.71% (8) of respondents were in favour maintaining the current boundaries.

## Recommendation 2

- It was found that 46.43% (65) of respondents were in favour of recommendation 2 to keep Bildeston Road in Combs; no change.
- It was found that 45.71% of respondents left the response blank for recommendation 2, either because this issue was not as prominent or pertinent to respondents as the first question.
- IT was found 5.00% (7) of respondents thought that Bildeston Road should be moved into either Little Finborough or Battisford.

## Overall

- It was found that 7.86% (11) of respondents declared a disability, showing a fair level of representation was achieved within the consultation.
- It was found that 0% (0) of respondents' answers did not match their explanations, displaying a confident level of understanding of those who partook in the exercise.
- It was found that 3.57% (5) of respondents noted a lack of information. This was reasoned to be around the pro's, cons, and council tax elements. The scope of which falls outside the legal considerations for Community Governance Review as facilitator and could have been interpreted as creating bias. The responsibility of such information therefore falls to the Parishes to conduct their own campaign around the matter, in a similar vein to a Neighbourhood Planning Referendum (NPR).

A list of anonymised responses can be found within the [Consultation Responses report](#).

## 4. Statutory Criteria

4.1. The legal tests of a Community Governance Review:

- To reflect the identities and interests of the community in that area
- To provide effective and convenient local government – ‘viability in the provision of services’
- To take into account other arrangements for community representation/engagement

4.2. There are no statutory periods for consultation, however the Local Government Association recommends a 6-to-12-week period for a consultation exercise, and the Association of Electoral Administrators supports councils following usual timescales for other consultations.

- [LGA on consulting residents](#)
- [Guidance on community governance reviews \(lgbce.org.uk\)](#)
- [Local Government and Public Involvement in Health Act 2007 \(legislation.gov.uk\)](#)

4.3. There is no statutory obligation to write out to households in the duration of a consultation, the Local Government and Public Involvement in Health Act 93 (2) states “*subject to those duties, it is for the principal council to decide how to undertake the review.*” However, it was agreed by the Working Group and Council as best practice to encourage higher levels of engagement.

## 5. Final Assessment and Final Recommendations

### 5.1. Assessment

The Community Governance Review process has provided several insights into the Battisford and Combs boundary matter, these have been taken into consideration the agreement of the Working Group’s final recommendations.

- Initial assessment from consultation 1
- Site visit
- History and the prior community governance review
- Further consultation report

## 5.2. The Final Recommendations

### Purpose of the Review:

The recommendations are guided by the overarching purpose of community governance reviews, which is to ensure that governance arrangements reflect the identity and interests of local communities. By maintaining consistency with the draft recommendations, the final proposals aim to uphold this fundamental objective and promote effective and convenient local government.

### Stakeholder Engagement and Consultation:

The recommendations are informed by extensive stakeholder engagement and consultation processes conducted throughout the review period. Input from various stakeholders, including Parish Councils, Town Councils, County Councillors, District Councillors, and members of the public, has been carefully considered in formulating the recommendations. The high level of engagement and responses received during the consultation phases provides robust evidence supporting the continuity between draft and final recommendations.

### Historical Context and Prior Reviews:

The recommendations take into account the historical context and surrounding areas. Insights gleaned from prior reviews, including stakeholder preferences and community identity considerations, have been factored into the decision-making process, contributing to the consistency between draft and final recommendations.

### Evidence-based decision-making:

The recommendations are grounded in a thorough assessment of submissions, consultations, and statutory criteria governing community governance reviews. Detailed analysis of consultation turnouts, public responses, and relevant statutory obligations has informed the formulation of the recommendations, ensuring that they are evidence-based and aligned with the principles of good governance.

After careful review and consideration, it is affirmed that the final recommendations presented herein align closely with the draft recommendations previously circulated. Through detailed evaluation and stakeholder input, it has been determined that the initial proposals aptly address the identified needs and objectives outlined in the community governance review process. As such, the final recommendations reflect a

reaffirmation of the strategic direction established in the draft stage, underscoring continuity and coherence in the proposed course of action.

Final Recommendations:

- 1. Council is asked to agree that the boundary between Combs Parish Council and Battsford Parish Council is amended as indicated on the attached Plan (Appendix E) to include the Bowl Meadow Development.**
- 2. Council is asked to agree that the Bildeston Road remain as part of Combs Parish Council - No change.**

Reasons:

1. Local preference (the proposal was supported by Battsford PC and not opposed by Comb PC on the basis that it made logical sense but that the electors should decide.
2. The Bildeston Road dwellings are long standing existing dwellings which already identify with Combs Parish Council.
3. The further consultation responses have demonstrated significant support from both communities towards the initial proposals of the Working Group recommendations.

## 6. Consequential Matters & Next Steps

- 6.1. Consequential matters, refer to financial matters, the transfer of assets, electoral matters, and the legislative action required from the LGBCE to be able to enact boundary changes.
- 6.2. Due to the recent boundary changes made by the parliamentary and LGBCE, any order would not take effect until 1 April 2027 for financial and administrative purposes, and 6 May 2027 for electoral matters owing to the next parish cycle.

### 6.3. Assets and Precept

- 6.3.1. As Parishes and Town councils do not receive any money from central government, they are reliant on income raised from the precept.
- 6.3.2. In the context of this CGR, Combs Parish Council does not have any assets that would as a consequence of the boundary move be required to be transferred to Battsford Parish Council.



6.3.3. In the event of a boundary move, the precept of the Bowl Meadow development would be aligned to Battisford. The current annual precepts for the average D band property are:

- Battisford: £52.13
- Combs: £28.46

#### 6.4. Local Government Boundary Commission for England (LGBCE)

6.4.1. The Principal Authority must keep the LGBCE informed of any changes to the electoral arrangements within its area to ensure other reviews within the area take the arrangements into consideration.

6.4.2. With the conclusion of the Parliamentary boundary review 2023, it has been noted that the two areas of Battisford and Combs now fall into different constituencies; Combs falls into the Bury St Edmunds and Stowmarket constituency, whilst Battisford falls into the Central Suffolk and North Ipswich constituency. A boundary move would therefore require the creation of a separate polling district for Bowl Meadow, to align electors in all other elections which the LGBCE can amend; district, county, and parish. The LGBCE cannot however change the parliamentary boundary and therefore residents of Bowl Meadow will vote in the Bury St Edmunds and Stowmarket constituency until the next parliamentary boundary review.

#### 6.5. Electoral Matters

6.5.1. Changes to the boundary would only take effect from the local elections in May 2027.

#### 6.6. Consequential Matters

As the recommendation is to move the boundary, consequential matters subject to Council approval are as below:

- That the Monitoring Officer be authorised to make the above changes effective from 1st April 2027, for administrative purposes, and from 6th May 2027 for electoral purposes.
- To make a Mid Suffolk District Council (Reorganisation of Community Governance) (Battisford) Order 2024.

## 7. Contact Details

W: <https://www.midsuffolk.gov.uk/community-governance-review>

E: [cgr@baberghmidsuffolk.gov.uk](mailto:cgr@baberghmidsuffolk.gov.uk)

Community Governance

Babergh and Mid Suffolk District Councils

Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

## 8. Legal Advice

Due to the unique nature of the Community Governance Review, legal guidance was sought to ensure that the Council conforms to all legislative requirements. For transparency, the following is a summary of the advice provided:

8.1. The 12-month framework for a Community Governance Review only applies to petition or application. Therefore, does not apply to district-wide reviews.

*(Section 93(8) of the Local Government and Public Involvement in Health Act 2007 with 2015 amendment.)*

8.2. The Council has full scope in the conduct of the consultation.

*(Section 93(2) of the Local Government and Public Involvement in Health Act 2007)*

8.3. The questionnaire provided was intelligible, with room for improvement.

*(In consideration to R (Better Streets for Kensington and Chelsea v The Royal Borough of Kensington and Chelsea [2023] EWHC 536 (Admin), at paras 36-47.)*

It is not a legislative obligation for the Council to disclose Council Tax changes, these fall outside the scope of Community Governance Review considerations.

*(Section 93(2) of the Local Government and Public Involvement in Health Act 2007 with 2015 amendment.)*

8.4. It is the Council that must make the final recommendation before the final comment period can commence. The Council therefore may adopt the recommendation of the Working Group or adopt its own.

*(Section 93(7) of the Local Government and Public Involvement in Health Act 2007 with 2015 amendment.)*

Overall, the advice lends credence to the conduct of the Community Governance Review and provides confidence in the undertaking of future Community Governance reviews.

## Appendix 1. Methodology

### Further Consultation Methodology

- District Councillors were pre-notified of the commencement of the further consultation period through the [monthly newsletter](#).
- The Stage 2 consultation began on November 10<sup>th</sup>, 2023, and was due to run until December 22<sup>nd</sup>, 2023. This was extended until January 10<sup>th</sup>, 2024, affording affected stakeholders 8 and half weeks to respond, either by post or email.
- The Community Governance Review webpage used for the stage 1 consultation was re-instated, and updated with further information for stage 2, alongside the executive report and the draft recommendations.
- The consultation web page contained a downloadable pdf survey allowing residents and other stakeholders to submit views on the draft recommendations via email.
- An A4 page information pack was also prepared containing the similar information to what was on the webpage, signposting to the webpage, as well as a copy of the survey in paper format and the map of the area concerned within the community governance review.
- An option was provided to request further hard copies of the questionnaire via telephone or email for those residents who preferred to complete a paper copy of the questionnaire or who did not have access to the internet.
- Surveys and maps were prepared, upon request, for any Councillors and Parish/Town Councils to assist with additional provisions.
- Posters were sent to Councillors and Parish/Town Councils to circulate and promote engagement. These featured on the district webpage.
- Prepaid envelopes were included to packs dispatched to encourage responses.
- Social media feeds were used to boost awareness of the consultation process.
- The A4 questionnaire was created printable in A3 for the visually impaired.

## Appendix 2. Questionnaire

Babergh and Mid Suffolk District Councils

# Community Governance Review - Battisford and Combs



The recommendations that we are seeking your opinions on, are:

1. To agree that the boundary between Combs Parish Council and Battisford Parish Council is amended as indicated on the attached Plan (Appendix E) to include the Bowl Meadow Development.
2. To agree that the Bildeston Road remain as part of Combs Parish Council - No change.

Please tell us your views by completing the questions below.

### Using your personal information

Any information provided in this survey will be used in the strictest confidence and only for the use of the community governance review.

For further information on how we collect, use, share, secure and retain your personal information, and your legal rights, please see our Privacy Notice at <https://www.midsuffolk.gov.uk/privacy-policy>

### Residency/Locality

#### Q1 Please state which of the following best describes you?

- I live in Battisford or Combs (please state your home postcode below)
- I work in Battisford or Combs (please state your workplace postcode below)
- I own a business in Battisford or Combs (please state your business postcode below)
- I am a representative of a community organisation in Battisford or Combs  
(Please state which one below)
- Other

Please state your postcode:

Please state community organisation:

Please state other:

## Recommendation Views

Q2 **Option 1 - Agree** the boundary between Combs Parish Council and Battsford Parish Council is amended as indicated on the attached Plan (Appendix E) to include the Bowl Meadow Development.

**Option 2 - Disagree** the boundary between Combs Parish Council and Battsford Parish Council is amended, and for boundaries to remain the same as they currently are – no change.

Option 1 (Agree) *please go to question 4*

Option 2 (Disagree) *Please go to question 5*

Some other option *Please go to question 6*

Don't know / not sure *Please go to question 7*

**Please tick only one option**

Q3 **Option 3 - Agree that Bildeston Road remain as part of Combs Parish Council - No change.**

**Option 4 - Disagree that Bildeston Road remain as part of Combs Parish Council.** The electoral arrangements of Bildeston Road would come under reconsideration by the working group.

Option 3 (Agree) *please go to question 8*

Option 4 (Disagree) *Please go to question 9*

Don't know / not sure *Please go to question 10*

**Please tick only one option**

Q4 **In reference to Q2, please tell us why you chose option 1**

Q5 **In reference to Q2, please tell us why you chose option 2**

**Q6 In reference to Q2, please provide details on other options available?**

**Q7 In reference to Q2, please tell us why you don't know or are not sure on which option you prefer?**

**Q8 In reference to Q3, please tell us why you chose option 3**

**Q9 In reference to Q3, please tell us why you chose option 4 and provide any alternative arrangement suggestions.**

**Q10 In reference to Q3, please tell us why you don't know or are not sure on which option you prefer?**

Q11 **Are there any further comments you would like to add about the Community Governance Review?**

**Contact details**

If you would like to be kept informed on the Community Governance Review and notified for comments in any future developments of the final recommendations following this further consultation, please provide your name and preferred contact details below.

Name:

Address:

Email address:

**Demographic Data**

**Age**

Which age category are you in?

- 16 - 19
- 20 - 29
- 30 - 39

- 40 - 49
- 50 - 59
- 60 - 69

- 70 - 79
- 80+
- Prefer not to say

**Disability**

Do you consider yourself to be a disabled person or to have a long-term, limiting condition?

- Yes
- No
- Prefer not to say

**Thank you for taking the time to complete this survey.**



# **Community Governance Review Consultation Responses (Phase 2) January 2024**

---

Battisford and Combs

We are committed to the principles of fairness and respect at Babergh and Mid Suffolk District Councils

Document Owner: Directorate of Law & Governance  
Community Governance  
Version: 1  
Date: 12 March 2024



## Contents

1. Summary .....	3
2. Responses.....	6
<b>2.1.</b> Recommendation View on Recommendation 1 – To move the Bowl Meadow development into the Battsford boundary.....	6
<b>2.2.</b> Explanations – Option 1 To move the Bowl Meadow development into the Battsford boundary.....	7
<b>2.3.</b> Explanations – Option 2 For no change to the current arrangements .....	8
<b>2.4.</b> Explanations – Option 3 Some Other Option.....	8
<b>2.5.</b> Explanations – Option 4 Unsure/ Don’t Know .....	9
<b>2.6.</b> Recommendation View on Recommendation 2 – To Keep Bildeston Road within the Combs Boundary.....	9
<b>2.7.</b> Explanations – Option 1 For Bildeston Road to remain a part of Combs.....	10
<b>2.8.</b> Explanations – Option 2 For no change to the current arrangements .....	11
<b>2.9.</b> Explanations – Option 4 Unsure/ Don’t Know .....	12
3. Recommendation 1 Consultation Comments Lists .....	13
<b>3.1.</b> Agree Comments.....	13
<b>3.2.</b> Disagree Comments.....	17
<b>3.3.</b> Other Comments.....	17
<b>3.4.</b> Unsure Comments .....	17
4. Recommendation 2 Consultation Comments Lists .....	17
<b>4.1.</b> Agree Comments.....	17
<b>4.2.</b> Disagree Comments.....	19
<b>4.3.</b> Unsure Comments .....	20
5. Representations from Community Organisations and Other Respondents .....	20
6. Equalities Monitoring .....	21

## 1. Summary

1.1. The Community Governance Review phase 2 consultation commenced on 10<sup>th</sup> November 2023 and initially was to run for 6 weeks until 22<sup>nd</sup> December 2023. An extension was granted by the Community Governance Working Group to extend the consultation period until 10<sup>th</sup> January, providing additional consultation due to delays experienced by the printing service. All households within the areas of the community governance review received a letter, survey, and map to participate in the consultation.

A Total of **140** responses were received during this period, **none** of which were received from the extended period. A summary of the responses precedes a detailed breakdown.

### 1.2. Which of the above options is your preferred option?

Agree with the Draft Recommendations	124	88.57%
Disagree with the Draft Recommendations	8	5.71%
Some Other Option	2	1.43%
Blank	4	2.86%
Unsure	2	1.43%
Total		140 100.00%

### 1.3. For Recommendation 1 Why you chose option 1 – Agree (To move Bowl Meadow development into Battsiford)

Of those that Agree

Sense/logic	70	58.33%
Proximity	49	40.83%
Identity	11	9.17%
No Affect	6	5.00%
Agreement with Draft Recommendations	5	4.17%
Infrastructure	1	0.83%
Battsiford Management	1	0.83%
Funding	1	0.83%

### 1.4. For Recommendation 1 Why you chose option 2 – Disagree (For Bowl Meadow development to remain in Combs)

Of those that Disagree

Boundary Status Quo	4	50.00%
Big Enough/ Encroachment	2	25.00%

### 1.5. For Recommendation 1 Why you chose option 3 - Some Other Option

For those that chose Some Other option

Land South-West Included	1	50.00%
Funding	1	50.00%
Agreement with Draft Recommendations	1	50.00%

### 1.6. For Recommendation 1 Why you chose option 4 – Unsure/ I Don't Know

Of those that are Unsure

Not Enough Info	1	50.0%
Query about Council Foreknowledge	1	50.0%

### 1.7. For Recommendation 2 Why you chose option 1 – Agree (For Bildeston Road to remain in Combs)

Of those that Agree

Historical/ Status Quo	23	35.38%
Identity	12	18.46%
Sense/logic	12	18.46%
Proximity	6	9.23%
Agreement to Draft Recommendations	2	3.08%
Encroachment	3	4.62%
Doesn't affect me	1	1.54%
Finance	1	1.54%
Parishes in Agreement	1	1.54%

### 1.8. For Recommendation 2 Why you chose option 2 – Disagree (For Bildeston Road to be considered in either Little Finborough or Battsford)

Of those that Disagree

Sense/logic	3	42.86%
Identity	2	28.57%
Proximity	1	14.29%
Finance	1	14.29%
Development	1	14.29%
Maintenance	1	14.29%

### 1.9. For Recommendation 2 Why you chose option 4 – Unsure/ I Don't Know

Of those that are Unsure

Not Enough Info	2	50.0%
Query about Council Foreknowledge	1	25.0%
Residents of Bowl Meadow to Decide	1	25.0%

### 1.10. Please State which of the following best describes you?

I live in the Battsford or Combs	98.57%
I work in Battsford or Combs	0.00%
I own a Business in Battsford or Combs	0.71%
I am a representative of a community organisation in Battsford or Combs	0.71%
Other	0.00%

### 1.11. Contact details

A total of **136** respondents have provided their contact details to be kept informed on the Community Governance Review.

### 1.12. Disability

A total of **11** respondents indicated that they have a disability representing **7.86%** of those who submitted a response.

### 1.13. Correspondence

Post	139	99.29%
Email	1	0.71%

### 1.14. Demographics

16 - 19	0	40 - 49	9	70 - 79	47
20 - 29	0	50 - 59	12	80+	12
30 - 39	3	60 - 69	49	Prefer Not to Say	8

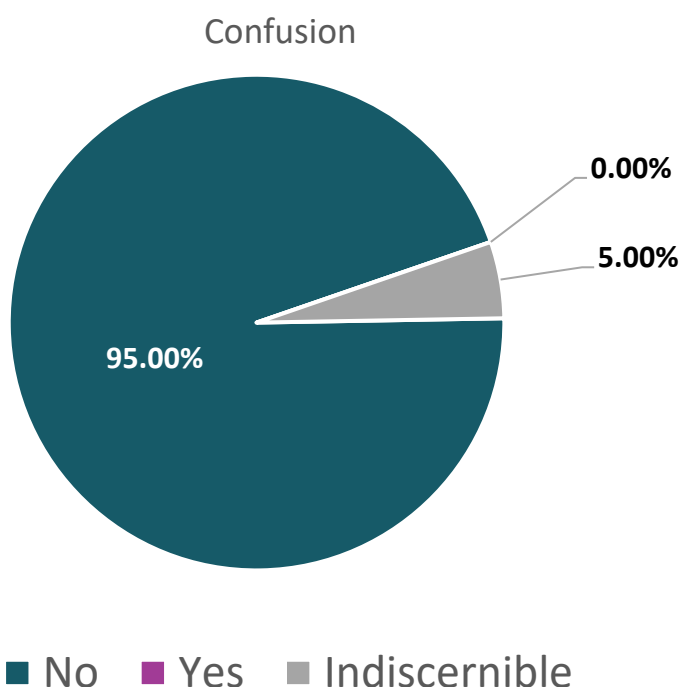
### 1.15. Clarity of Materials

Respondents self-reporting difficulties within their comments were captured.

	Questionnaire Complexity	Doesn't understand	Lack of Information	Map Unclear
<b>TOTAL</b>	<b>1</b>	<b>0</b>	<b>5</b>	<b>5</b>
<b>PERCENT</b>	<b>0.71%</b>	<b>0.00%</b>	<b>3.57%</b>	<b>3.57%</b>

### 1.16. Confusion

All respondents' answers matched their explanations provided, representing **95.00%** of those who submitted a response. **5.00%** of respondents' answers could not be matched as they did not submit their responses with explanatory comments. Overall, a confirmed **95.00%** of respondents understood the consultation exercise.

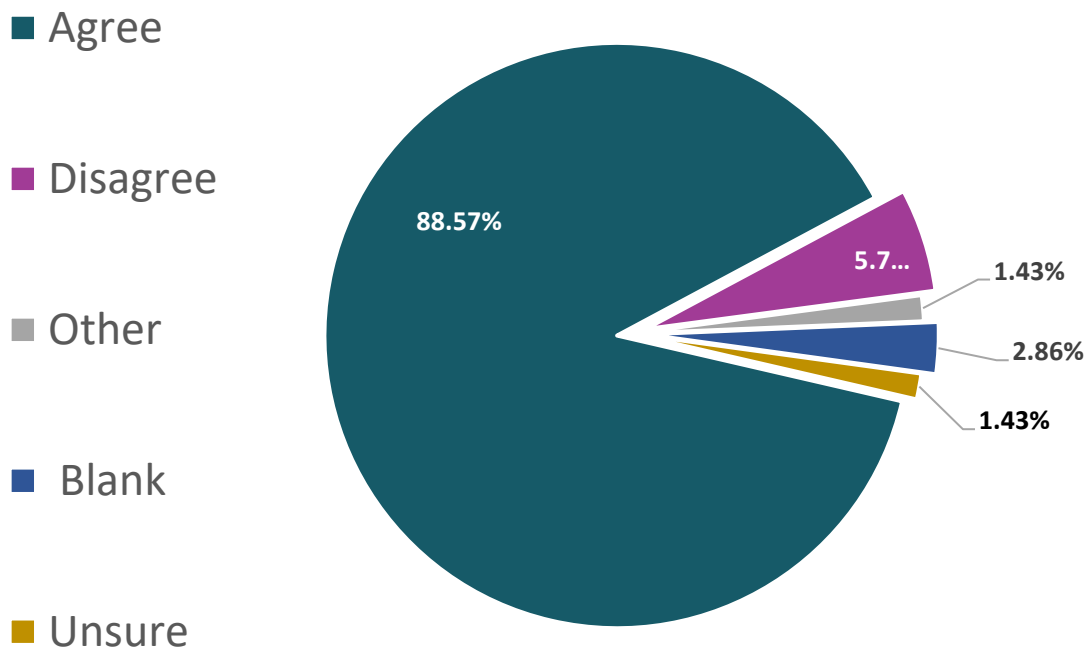


## 2. Responses

### 2.1. Recommendation View on Recommendation 1 – To move the Bowl Meadow development into the Battsiford boundary.

The majority of responses with **88.57%** prefer option 1 to move Bowl Meadow development into the Battsiford boundary. **5.71%** of responses indicated a preference for option 2 for no change to the existing arrangement.

Community Governance Review for Battsiford and Combs - Second Phase Consultation 2023-34  
Move Bowl Meadow Development into Battsiford



## 2.2. Explanations – Option 1 To move the Bowl Meadow development into the Battsiford boundary.

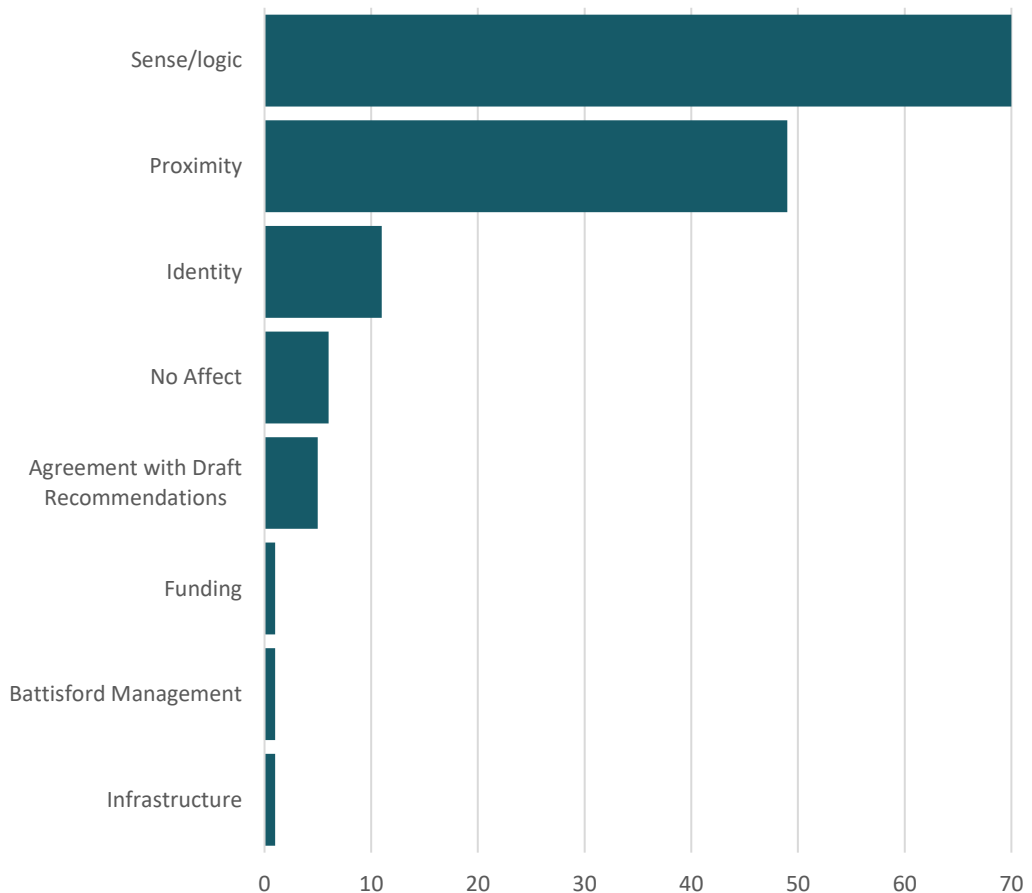
Out of the 120 respondents that ticked option 1 – no change. A total of 117 comments were received. A summary of those comments by theme can be found below and the entirety of the comments by option can be found in the subsequent sections.

**A note on themes:** Themes are commonly reoccurring words that have been grouped on the similarity of meaning to provide meaningful quantitative statistics from the qualitative data received.

The top 3 reasons why respondents stated option 1 was chosen:

1. It makes sense/ is a logical decision
2. Proximity
3. Identity of the area

Battsiford and Combs Consultation Commonality of Themes - Recommendation 1 Agree



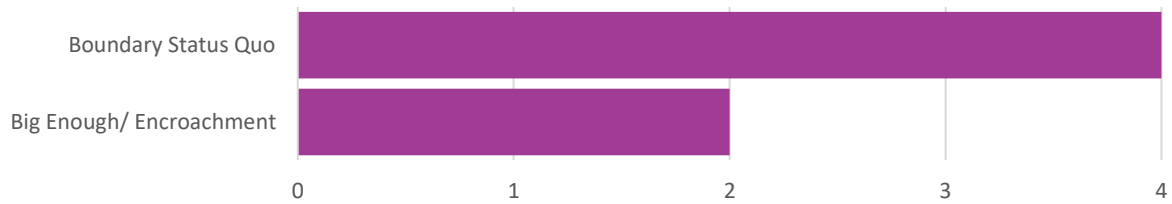
### 2.3. Explanations – Option 2 For no change to the current arrangements

Out of the 8 respondents that ticked option 2 – to move the areas into Stowmarket. A total of 7 comments were received. A summary of those comments by theme can be found below.

The top reasons why respondents stated option 2 was chosen:

1. Preference to boundary status quo
2. Concern the Battisford is big enough/ encroachment

Battisford and Combs Consultation Commonality of Themes - Recommendation 1 Disagree



### 2.4. Explanations – Option 3 Some Other Option

Out of the 2 respondents that ticked option 3 – Some Other Option. All 2 provided explanatory comments. A summary of those comments by theme can be found below.

The top reasons why respondents stated option 3 was chosen:

1. Funding
2. Include the land South-West of Bowl Meadow

Battisford and Combs Consultation Commonality of Themes - Recommendation 1 Some Other Option



### 2.5. Explanations – Option 4 Unsure/ Don't Know

Out of the 2 respondents that ticked option 4 – Unsure/ Don't Know. Both provided explanatory comments. A summary of those comments by theme can be found below.

The reasons why respondents stated option 4 was chosen:

- 1. Not enough information – Town/Parish narrative on the political elements (e.g. Council Tax)
- 2. Query about Council foreknowledge

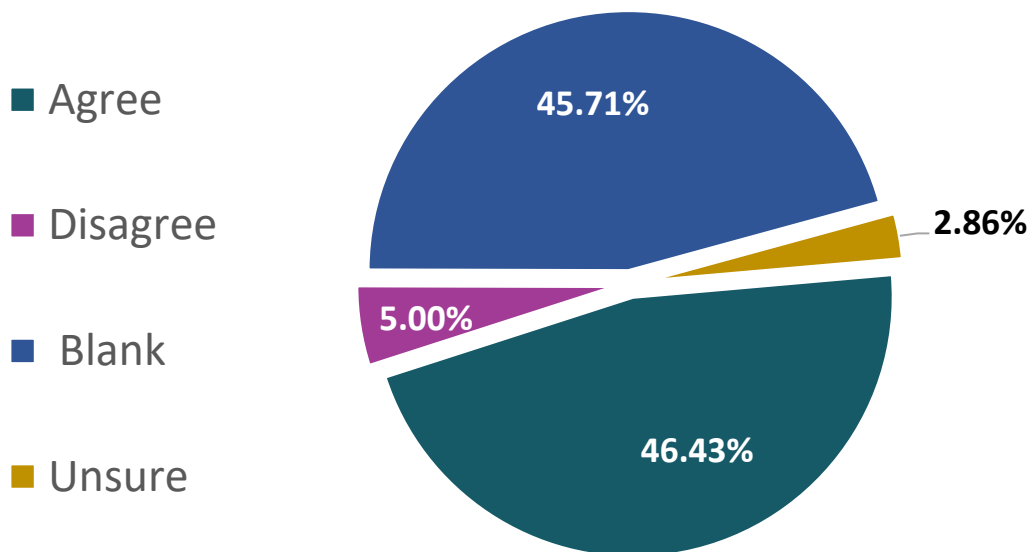
Battisford and Combs Recommendation 1- Option 4  
Unsure/ Don't Know



### 2.6. Recommendation View on Recommendation 2 – To Keep Bildeston Road within the Combs Boundary

The majority of responses with 46.43% prefer option 1 to keep Bildeston Road within the Combs boundary. 5.00% of responses indicated a preference for option 2 to disagree with Bildeston Road remaining in Combs. Additionally, 45.71% of respondents did not indicate a preference.

Community Governance Review for Battisford and Combs - To  
Keep Bildeston Road in Combs





## 2.7. Explanations – Option 1 For Bildeston Road to remain a part of Combs

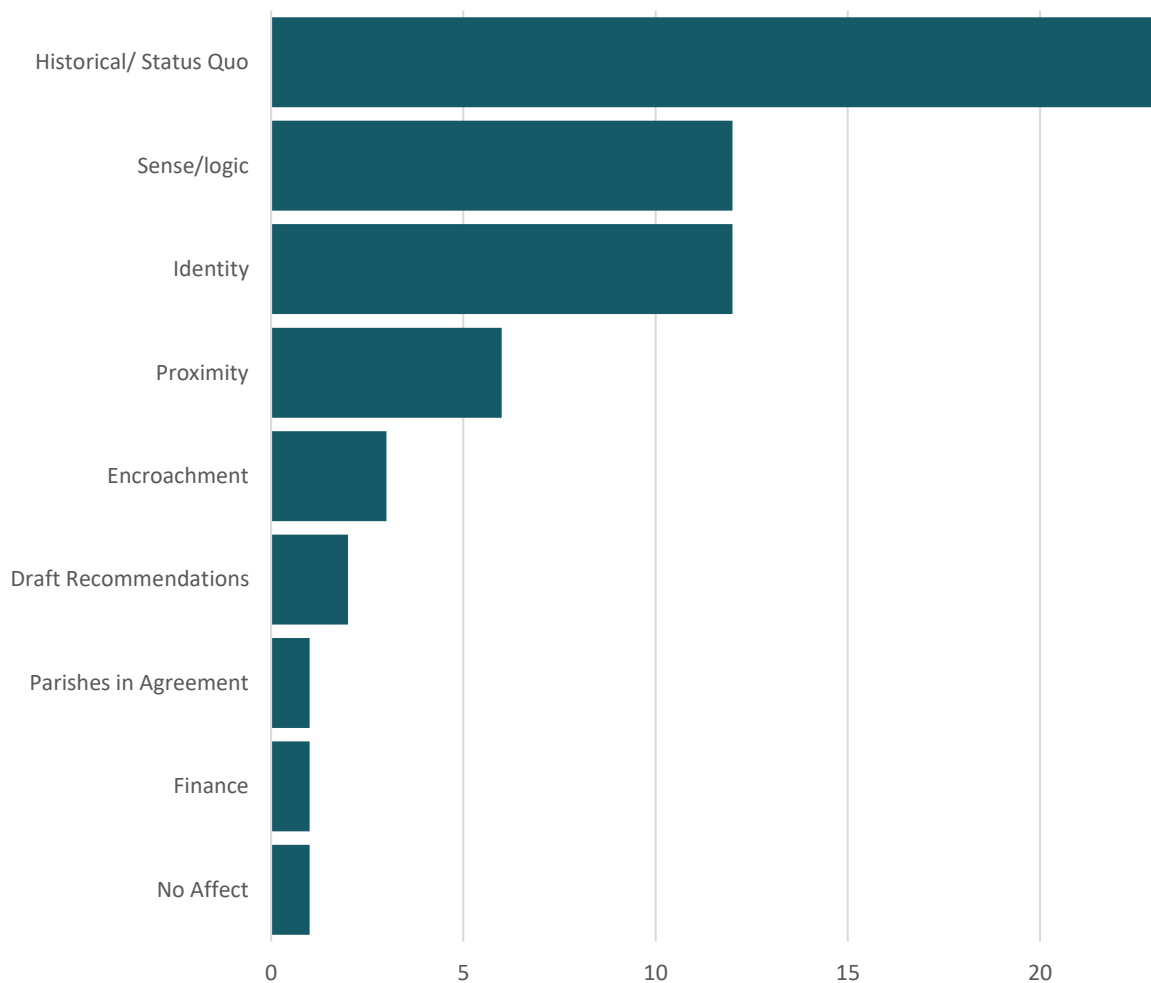
Out of the 65 respondents that ticked option 1 – no change. A total of 52 comments were received. A summary of those comments by theme can be found below and the entirety of the comments by option can be found in the subsequent sections.

**A note on themes:** Themes are commonly reoccurring words that have been grouped on the similarity of meaning to provide meaningful quantitative statistics from the qualitative data received.

The top 3 reasons why respondents stated option 1 was chosen:

1. Historical connection/ preference for the status quo
2. The recommendation makes sense/ is a logical decision
3. The Identity of the area and residents reflect their current arrangement

Battisford and Combs Consultation Commonality of Themes - Recommendation 2 Agree



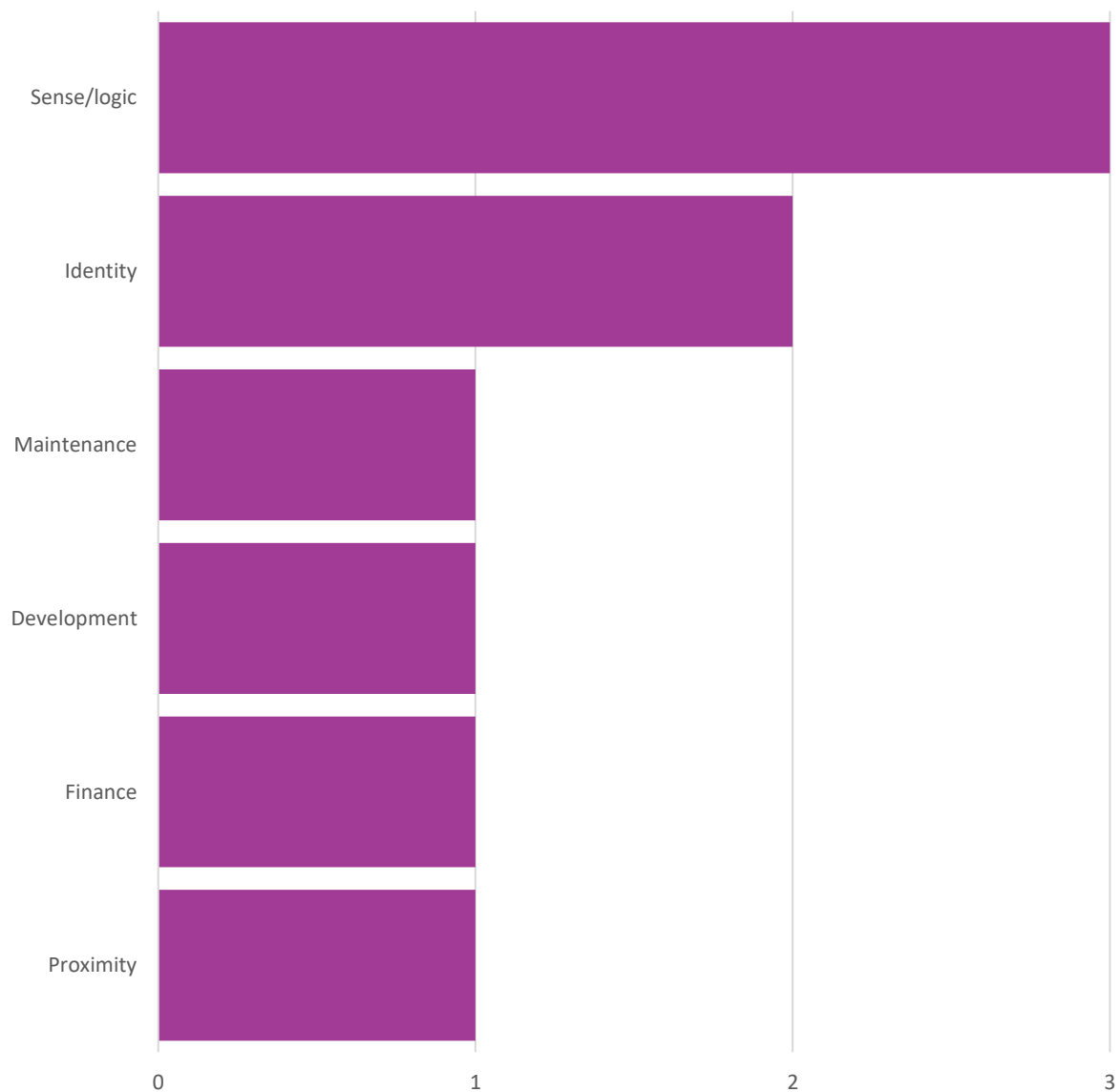
### 2.8. Explanations – Option 2 For no change to the current arrangements

Out of the 7 respondents that ticked option 2 – to move the areas into Stowmarket. A total of 6 comments were received. A summary of those comments by theme can be found below.

The top reasons why respondents stated option 2 was chosen:

1. The recommendation makes sense/ is a logical decision
2. Identity/community of the area is more closely aligned with Battsiford

Battsiford and Combs Consultation Commonality of Themes - Recommendation 2 Agree



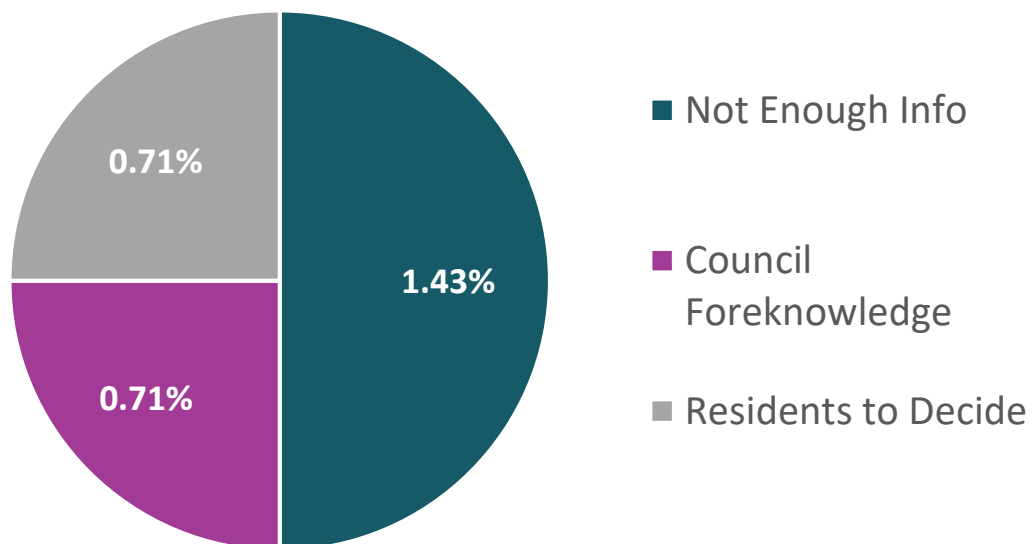
### 2.9. Explanations – Option 4 Unsure/ Don't Know

Out of the 4 respondents that ticked option 4 – Unsure/ Don't Know all respondents provided explanatory comments. A summary of those comments by theme can be found below.

The top 3 reasons why respondents stated option 4 was chosen:

1. Not enough information provided on the implications
2. Residents Should decide
3. Query about Council foreknowledge

Battisford and Combs Reccomendation 2 - Option 4  
Unsure/ Don't Know



### 3. Recommendation 1 Consultation Comments Lists

#### 3.1. Agree Comments

Comments	Additional Comments
<b>It makes sense to move that boundary</b>	
<b>It just makes sense</b>	
<b>I agree with the reasons given by the working group (of which 2 were outlined</b>	
<b>No objections</b>	
<b>Because it is so close to the Village</b>	
To include Bowl Meadow	
It doesn't affect us as a family or community at all	
<b>No detriment to us</b>	
Bowl Meadow development is within the built-up area of Battsiford	
<b>Because the Bowl Meadow development is clearly within the built environment of Battsiford and hence should be covered by Battsiford Parish Council</b>	On reflection, I think it is important that the views of the Bildeston Road residents are considered
<b>Given the location of the dwellings adjacent to Battsiford + The separation from other Combs properties, this appears to make sense</b>	
<b>Any development in the area defined would be linked directly to homes adjacent &amp; opposite. It would form part of Battsiford community. Keeping continuity.</b>	In all my time in Suffolk I have found Battsiford to be strong in community spirit. Since being here I've been invited to take part in local activities. This is why I strongly believe that a area of housing directly on the boundary and disconnected from housing of the other parish would not be beneficial to the residents living in the development, they would want to have a say in the area they directly live in.
<b>The fact that the Bowls Meadow development is on the outskirts of Battsiford and adjacent to it, it makes sense to change the boundary to include it.</b>	
<b>The Bowl Meadow development is adjacent to Battsiford. The proposed change is more rational.</b>	
<b>Logical</b>	
<b>It makes logical sense, the properties clearly identify with the village of Battsiford, rather than Combs.</b>	Other than thank you for seeking the opinion of the local residents on this matter!
<b>Easier to approach Battsiford PC Members &amp; also makes common sense as Bowl Meadow is nearer &amp; attached to the village boundary. Also my postal address is Battsiford NOT Combs.</b>	
<b>Simply makes sense</b>	
<b>Bowl Meadow development is the outskirts of Battsiford main community &amp; makes sense they are combined</b>	
<b>Because it makes sense</b>	It has been a long time coming
<b>It seems logical because the development is within the Battsiford conurbation</b>	
	Combs Parish is coming under increasing pressure from all sides as Stowmarket keeps taking areas away in North East Combs Ford area & Now Battsiford are wanting to take further areas on the South East boundary. We would not want to see the historic boundaries degraded any further
<b>The new houses join our existing boundary</b>	

<b>Boundary to be amended as indicated</b>	
<b>As per reason 1 given in opening letter. The position of the Bowl Meadows development makes it a sensible reason for it to be within the parish of Battisford</b>	
<b>Makes no difference to me</b>	
<b>Bowl Meadow is directly attached to the village, also access through to parking for the pub which is in Battisford. Common sense solution</b>	
<b>Logistically it makes sense!</b>	
<b>Logistically it makes sense!</b>	
	<p>It would seem sensible that the new dwellings, now in Combs, abutting a large area of existing dwellings in Battisford would be included in Battisford. This would make it easier for delivery drivers &amp; those without satnavs.</p> <p>But surely, it's the ones affected by a change in the boundaries that should decide - I'm not affected.</p> <p>The format of this questionnaire is too cumbersome and can be summed up in just this box!</p>
<b>Seems a sensible move</b>	
<b>Common sense applies here</b>	
<b>Bowl Meadow development is adjacent to Battisford and remote from Combs</b>	
<b>Looks like it makes sense given the dwellings nearby</b>	
<b>Seems obvious that it is integral to Battisford</b>	
<b>It immediately joins other housing in Battisford but is some distance from development in Combs</b>	
<b>For a small plot of land, it really doesn't make a huge difference to either parish</b>	<p>This seems like a pointless exercise, to justify someone's job. It is expensive with all the administration it must create &amp; at the end of the day, why is it such a big deal??</p>
<b>Because it's a continuation of the existing houses which are already in Battisford Parish Council</b>	
<b>Seems correct. I'm sure the residents identify as being in Battisford</b>	
<b>If the residents of the Bowl Meadow development are happy to change Parish, location does suggest they are attached to Battisford cluster of houses</b>	<p>If residents of a location are unwilling to change Parish after they have purchased a property, then please don't enforce.</p>
<b>Makes logical sense</b>	
<b>Happy to support general views of council, as in opening letter</b>	
<b>Seems sensible to do so, cannot see why you would not</b>	
<b>Seems logical</b>	
<b>Seems the logical thing to do</b>	
<b>Logical sense</b>	
<b>Bowl Meadow is much closer to Battisford that it makes sense to include it within the boundaries</b>	
<b>Logistically it makes sense, but it would have been better to explain the implications of the move and not just the land boundary</b>	<p>More Information should have been given about the implications of a boundary change so that an informed choice could be made.</p> <p>The map!!! - totally incomprehensible! It just so happens that I knew Bildeston Road but even with a magnifying glass I cannot read it on such a poor copy.</p>
<b>It is a logical re-arrangement</b>	
<b>It makes sense</b>	

I agree it seems logical for Bowl Meadow to be included in Battsiford, next to and opposite other Battsiford houses.	
It seems logical. As no houses beyond Bowl Meadow for quite a distance	
No objection	
The residents of Bowl Meadow think of themselves as living in Battsiford - most did not know they were in Combs! Combs Parish Council received the CIL money but Battsiford will support the residents there - village hall, pub, PC support, etc, community events, play area. They are welcome.	
The community/ residents of the new development naturally relate to Battsiford by virtue of their position	
The boundary amendment is logical and supports the interests of all residents. The Punch Bowl Inn has a designated parking area within Bowl Meadow. Placing this area within the same village as the pub makes good sense.	
No reason to oppose	
Well the pub is in Battsiford and the Meadow was part of the pub therefore I believe it should be part of Battsiford	
	More streetlights for safety
The development is continuous with Battsiford Parish. Therefore, more interest & logical links for residents of Bowl Meadow development with activities of Battsiford	
This seems an entirely logical change	
Using roads and property locations as reference the proposed boundaries is a more logical distribution	
Surely it is w Battsiford/ adjoining	
Makes perfect sense	
Would appear to be better to include due to proximity	
To be included in Battsiford village community as so near the rest of the housing	The maintenance of Punch Bowl its overflow car park at Bowl Meadow. No lighting on reflective lights and path is so overgrown. Entrance should have been where footpath is.
Because it is next to and opposite houses already classed as Battsiford.	
Sensible option	
Because the people living there have much more attachment to Battsiford and I think most people would think it already was part of Battsiford	
Makes good sense , houses are adjacent to Battsiford dwellings	
Happy with the proposal as it makes sense for the Bowl Meadow development to be moved to the Parish of Battsiford	
The people living in Bowl Meadow actively participate in Battsiford activities, and have to drive through little Finborough as there are only footpaths connecting it directly to Combs	
It does not affect me	
It makes sense	
The houses in Bowl Meadow use the infrastructure within Battsiford not Combs	
Makes sense its actually feet away from the Battsiford sign	
It makes sense because it naturally falls into the / becomes part of village 'envelops'	
It makes logical sense, as is called Bowl Meadow, which is on Bowl Road, Battsiford	
Seems logical	
Looks a sensible amendment	

Because the position of these houses makes them "feel" part of Battsiford; and the name "Bowl Meadow" relates them to the Punch Bowl, which is in Battsiford.	
Seems to be a sensible thing to do	
Makes sense	
I believe this makes logical sense	
I live in Bowl Meadow & very much see our house as part of the Battsiford community	
It seems logical owing to the proximity of Bowl Meadow to the main body of the village of Battsiford	Though I have no objection to Bowl Meadow being included within Battsiford's boundaries, I do feel the opinions of the residents of Bowl Meadow should take precedence in this matter
It appears that the entire village of Battsiford Tye is included	
Makes sense geographically	
No comments	
Because the development already is connected to Battsiford village	
Makes sense for those living in that area to identify with Battsiford Parish	
	Sensible proposal and good review process. Thank you
It makes sense	
Proximity of the development makes sense to be included within Battsiford PC	The wording of this form is confusing. If it wasn't for the covering letter it wouldn't make sense.
It's the sensible option	
From the map it looks as though the properties in the development will be an integral part of Battsiford Village	
Makes sense!	
The location of building has an obvious attachment to Battsiford	
The location of building has an obvious attachment to Battsiford	
The properties naturally sit in Battsiford not Combs, so a logical change	
It makes sense	
It doesn't really affect me, where I live.	
Location makes it logical to include in Battsiford Parish	
It makes sense to me that those houses be part of the village of Battsiford as they are in essence sitting in that community.	
The development is clearly a small extension of Battsiford itself and should be included as part of it	
A geographically obvious move	
Makes sense	
Makes logical sense	
Likely that residents consider themselves linked to Battsiford	
Makes sense & postal address is Battsiford	Proposal 2 makes sense
Sensible	
Makes sense to add to existing housing because it is joined to Battsiford boundary	
It makes logical sense to include the Bowl Meadow development in Battsiford Parish	
It makes logical sense	
The option is the most logical in relation to the sites in question	

### 3.2. Disagree Comments

Comments	Additional Comments
The boundary should be fixed preventing uncontrollable development. No other options should be available. Bowl Corner not in keeping with Battisford	As on left page, lived in Stow for nearly 30 years. Onehouse is always will be part of Stowmarket no question about it.
The village is big enough	The village is a lovely community, to enlarge it would be detrimental
Leave the parish boundaries alone	Leave Combs alone
Leave the parish boundaries alone	Leave Combs alone
Don't want the size or importance of Combs to be diminished	Don't know/ have enough information to offer further general comments. More info would be welcome
	This questionnaire is impossible to understand

### 3.3. Other Comments

Comments	Additional Comments
Yes, I agree as long as Combs Parish Council gives Battisford the money for the development - Yes it should be part of Battisford as we have paid fortunes for drainage and utilities on the road outside Bowl Meadow it is only fair that Battisford gets some money back	It appears that Combs just want to pass on any problems created by ITS decision to allow development and all the ongoing problems with it. i.e. flooding and drainage
Option 1 + move the land SW of Bowl Road and housing adjacent to Little Finborough should be moved in Battisford and or Little Finborough to save further anomalies	Long overdue! The Parish Council requested this change years ago.

### 3.4. Unsure Comments

Comments	Additional Comments
You gave the go-ahead to let houses being built so you must have known the boundary	as per previous answer
<b>You don't say how the original proposal was generated - or why?</b> <b>You haven't outlined any benefits or disadvantages for either of the options!</b>	

## 4. Recommendation 2 Consultation Comments Lists

### 4.1. Agree Comments

Comments	Additional Comments
Existing community connect with Combs <b>As far as I know it has always been in Combs. So, it should stay the same</b>	
<b>No reason to change. Happy for Boundary to remain same.</b> <b>Bildeston Road has always been part of Combs and should remain so</b>	



<b>The Bildeston Road dwellings have long been part of Combs and should remain so.</b>	On reflection, I think it is important that the views of the Bildeston Road residents are considered
No apparent reason to change	
<b>Common sense!</b>	
<b>Logical</b>	
<b>Bildeston Road &amp; Park Road make up Combs</b>	
<b>Neither Battsford or Combs Parishes raise objections, so I go with their judgement.</b>	
<b>Longstanding + historic boundary over hundreds of years. Battsford has already taken a number of properties + changed boundaries over the years + would not want to see any further erosion of the boundary.</b>	Combs Parish is coming under increasing pressure from all sides as Stowmarket keeps taking areas away in North East Combs Ford area & Now Battsford are wanting to take further areas on the South East boundary. We would not want to see the historic boundaries degraded any further
<b>Agree that Bildeston Road remains in Combs</b>	
<b>Common sense &amp; residents identify as Combs</b>	
<b>Again, it seems sensible. The 90 degree bend at the Finborough Church is a natural place to differentiate between Combs and Battsford</b>	
<b>1) Council tax will increase with Battsford Parish Council 2) We purchased our home in the Parish of Combs and this is important to us to remain in Combs regarding house value regarding location</b>	If residents of a location are unwilling to change Parish after they have purchased a property, then please don't enforce.
<b>We live on Bildeston Road &amp; feel firmly this resides in Combs</b>	
<b>Makes sense</b>	
<b>It is part of Combs and should remain so</b>	The village is a lovely community, to enlarge it would be detrimental
<b>Leave the status quo</b>	
<b>I presume Bildeston Road runs from Little Finborough to Combs, but the very poor map enclosed does not show what part of Bildeston Road you are referring to. I therefore chose option 3 as it's the only option that makes sense.</b>	More Information should have been given about the implications of a boundary change so that an informed choice could be made. The map!!! - totally incomprehensible! It just so happens that I knew Bildeston Road but even with a magnifying glass I cannot read it on such a poor copy.
<b>There is no reason to change the existing plan</b>	
<b>It seems logical</b>	
<b>No reason to oppose</b>	
<b>We are all happy the way things are. Stop p***ing around with the boundaries it's obvious what's going on</b>	Leave Combs alone
<b>We are all happy the way things are. Stop p***ing around with the boundaries it's obvious what's going on</b>	Leave Combs alone
	More streetlights for safety
<b>As identified, there is long established connection with these dwellings &amp; Combs Parish. No need to change it.</b>	
<b>I have no strong opinion on this, and am happy to go along with the working groups findings</b>	
<b>It is beyond Battsford Border</b>	It appears that Combs just want to pass on any problems created by ITS decision to allow development and all the ongoing problems with it. i.e. flooding and drainage
<b>Long standing Combs residents</b>	
<b>Don't want the size or importance of Combs to be diminished. Don't want to be swallowed up by another area</b>	Don't know/ have enough information to offer further general comments. More info would be welcome
<b>This road is very sparsely populated and gives an open clear divide between the two villages</b>	
	This questionnaire is impossible to understand

Closer to Combs - common sense	
If these houses have always identified as part of Combs Parish Council, there seems no reason to change this	
Would seem to be an unnecessary change	
As stated, the existing dwellings have a long standing with Combs Parish Council	
As the rest of Bildeston Road is an established part of Combs	
If Bowl Road runs to Litte Finborough corner the Bildeston Road is after the corner, it is outside Battisford	
Makes logical sense	
No reason to change	Sensible proposal and good review process. Thank you
Why change	
Long standing association, no reason to change	The wording of this form is confusing. If it wasn't for the covering letter it wouldn't make sense.
No obvious or practical reasons to change	
I accept the dwellings along Bildeston Road identify with Combs	
It is outside the "enclosure" of the village so there seems no advantage in change for change's sake	
Makes sense	
Locations + residents identify with Combs	
	Proposal 2 makes sense
Sensible	
This also makes sense	

#### 4.2. Disagree Comments

Comments	Additional Comments
It seems more logical to have Bildeston Road as part of Battisford Parish as it is very close to Battisford and much further from Combs and would be more aligned to issues affecting Battisford	
<b>I would prefer this section of Road to be included due to the nature of properties along it being part of Battisford community.</b>	In all my time in Suffolk I have found Battisford to be strong in community spirit. Since being here I've been invited to take part in local activities. This is why I strongly believe that a area of housing directly on the boundary and disconnected from housing of the other parish would not be beneficial to the residents living in the development, they would want to have a say in the area they directly live in.
Bowl Road seems to be more part of Battisford than Combs. Extend boundary to include all of Bowl Road	
<b>Again, seems sensible that the road is adopted by Battisford. It would dispel arguments in the future as to who is responsible for the road, to split it does not work. it makes sense</b>	
<b>Further development along Bildeston Road would provide Combs with CIL money but Little Finborough/Battisford would be physically nearer.</b>	Long overdue! The Parish Council requested this change years ago.

### 4.3. Unsure Comments

Comments	Additional Comments
as per previous answer ( <i>You gave the go-ahead to let houses being built so you must have known the boundary</i> ) <b>I am not sure how a change would affect either Battsiford or Combs</b>	
<b>It is not clear from the map where Bildeston Road is - starts/finishes. I think I know where it is, but not confident enough to comment. Also, what are the implications for remaining or not?</b>	
<b>Should be up to residents of Bildeston Road to decide!</b>	

## 5. Representations from Community Organisations and Other Respondents

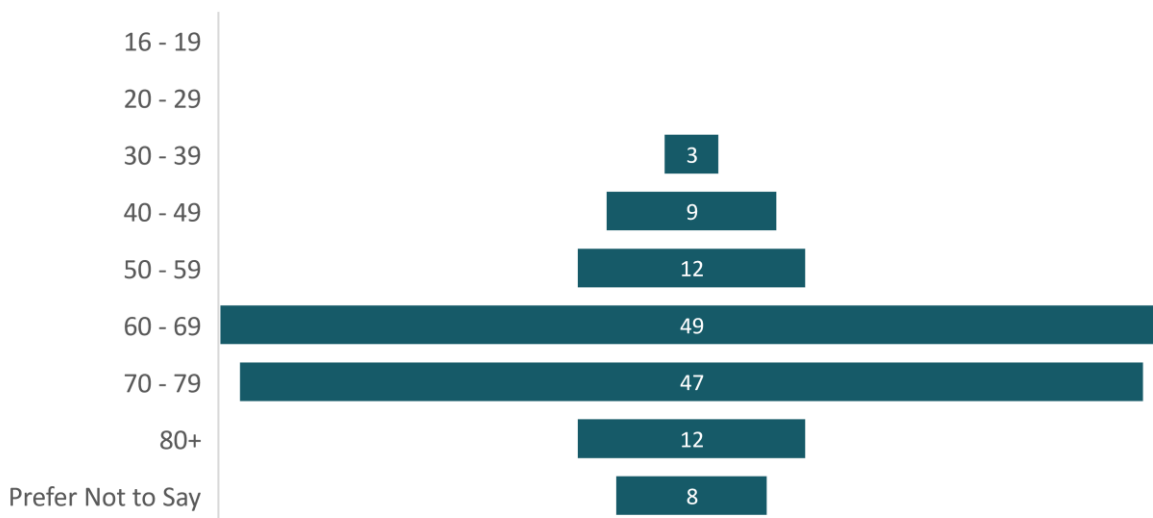
- West Suffolk
- Battsiford Snooker Club
- Webb & Son Combs Ltd
- Punch Bowl Inn CIC Ltd
- Punch Bowl Inn
- Village Hall
- Battsiford Village Hall Management Committee

## 6. Equalities Monitoring

### Age Group

The majority of responses received were from the **60-69** age bracket followed strongly by the **70-79** age bracket. These two age brackets make up **68.57%** of the total responses received. No consultations were received by **16-19** or **20-29** age brackets and **5.71%** of the respondents preferred not to disclose which age bracket they belonged to.

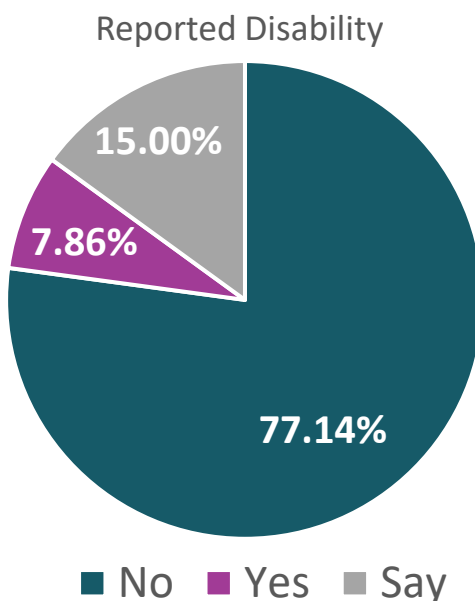
Demographic Data: Age Brackets



30 - 39	40 - 49	50 - 59	60 - 69	70 - 79	80+	Prefer Not to Say
2.14%	6.43%	8.57%	35.00%	33.57%	8.57%	5.71%

### Disability

The majority of respondents do not have a disability with **77.14%**. **7.86%** of respondents did disclose having a disability, whilst **15.00%** preferred not to disclose whether they had a disability or not.



This page is intentionally left blank

## Appendix C - Equality Impact Assessment (EQIA)

The characteristics protected by the Equality Act 2010 are:

Disability	Age	Sex (gender)
Gender reassignment	Marriage/civil partnership	Pregnancy/maternity
Race	Sexual orientation	Religion/belief

By law the council must have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Act.
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

In effect, this means that the council needs to ensure that our policies and services are fair, equitable and proportionate and where possible mitigate against any adverse impacts on people from the different protected characteristics.

In addition to the above protected characteristics, the council should consider the impact of living in a **rural area** as part of this assessment. Where people live is not a characteristic protected by law, but for an organisation such as Babergh and Mid Suffolk District Councils it is good practice to consider carefully how location may affect people’s experience of a policy or service.

The Rural-Urban definition defines the rurality of very small census-based geographies. Census Output Areas forming settlements with populations of over 10,000 (which are urban), while the remainder are defined as one of three rural types: *town and fringe, village or hamlet and dispersed*.

Details	
<b>Service or policy title</b>	Law and Governance
<b>Lead officer</b>	Patrick Richardson-Todd
<b>Officers carrying out the EQIA</b>	Patrick Richardson-Todd
<b>Is this new or a revision?)</b>	Revision
<b>Is this the first time this policy or function has been assessed?</b>	no
<b>Date of completing this EQIA</b>	January 24 <sup>th</sup> 2024

Description
<p><b>What exactly is proposed?</b></p> <p>Community governance review recommendations, involving administrative and electoral arrangements. The council is required to ensure that community governance within the area under review will:</p> <ul style="list-style-type: none"> <li>• be reflective of the identities and interests of the community in that area and</li> <li>• be effective and convenient</li> </ul>
<p><b>Why?</b></p> <p>Every ten-fifteen year period it is good practice for District Councils to review their community governance arrangements. In reception of a proposal from a qualifying petition or Parish Council the District is obligated to consider whether to undertake a community governance review.</p>

## Appendix C - Equality Impact Assessment (EQIA)

<p><b>What will the effect of the changes be?</b></p> <p>A Community Governance Review is a review of the whole or part of the council's area to consider one or more of the following:</p> <ul style="list-style-type: none"> <li>• creating, merging, altering or abolishing parishes</li> <li>• the naming of parishes and the style of new parishes</li> <li>• the electoral arrangements for parishes (the ordinary year of election, council size (the number of Councillors to be elected to council), and parish warding); and</li> <li>• grouping parishes under a common parish council or de-grouping parishes other types of local arrangements, including parish meetings</li> </ul>
<p><b>How will it be implemented?</b></p> <ul style="list-style-type: none"> <li>• Start of Review 23rd January 2023</li> <li>• Formal Notice of Review published</li> <li>• Notification sent to all interested parties</li> <li>• First Consultation starts July 26<sup>th</sup> 2023 ends 26<sup>th</sup> September 2023</li> <li>• Second Consultation starts November 10<sup>th</sup> 2023 ends 10<sup>th</sup> January 2024</li> <li>• Report to Council 20<sup>th</sup> March 2024</li> <li>• Boundary Orders communicated to the LG BCE for 2027 implementation.</li> </ul>
<p><b>When is it due to start?</b></p> <p>Changes to take effect 6<sup>th</sup> May 2027</p>

<p><b>Data about the population</b></p>
<p><b>What is the demographic profile or make up of the community you are serving?</b></p> <p><a href="https://www.suffolkobservatory.info/">https://www.suffolkobservatory.info/</a></p>
<p><b>What is the profile or make up of your service users by protected characteristics?</b></p> <p>Babergh and Mid Suffolk District Councils face a number of challenges relating to electoral engagement. The largest of these is the far lower propensity of some (largely urban) wards to turn out to vote during elections. These wards tend to contain higher proportions of people disadvantaged by class, unemployment, high levels of rental accommodation, lack of qualifications and general relative socio-economic deprivation. They also tend to contain a large proportion of young people and homemovers, ethnic minorities, residents with countries of birth outside of the U.K., those with low levels of English language proficiency and disabled people. This is probably related to the very low representation of all of these groups, as well as of women, as elected public officials (whether Councillors or MPs) in the Babergh and Mid Suffolk area.</p>

<p><b>Implications for communities and workforce</b></p>	
<p><b>Disability</b></p>	
<p>What is the impact on people with a disability (including children with additional needs) and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i></p>	<p>Differences in administrative local authority may impact the possibility of additional enabling provisions and the representation provided, i.e. consideration of disabilities on matters. The District and County authority have a higher obligation and role.</p>
<p>How does it have a positive or negative impact?</p>	<p>The consultation process requires attention to accessibility. The 'upon request' feature means assistance can be focused to the need.</p>

## Appendix C - Equality Impact Assessment (EQIA)

What could be done to mitigate any adverse impact or further promote positive impact?	Equality Monitoring is used to ensure considerations include representation from disabled backgrounds.
<b>Age</b>	
What is the impact on people of different ages and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	The exercise is of a technical nature and though this does not exclude those from younger backgrounds experience supports disengagement of youth.
How does it have a positive or negative impact?	Disengagement is a known negative.
What could be done to mitigate any adverse impact or further promote positive impact?	Social media campaigns were utilised in the communication plan and posters created to appeal to a wide audience.
<b>Sex (gender)</b>	
What is the impact on people of different genders and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	No known impact
How does it have a positive or negative impact?	No known impact
What could be done to mitigate any adverse impact or further promote positive impact?	n/a
<b>Gender reassignment</b>	
What is the impact on people who have undergone gender reassignment (i.e. transgender people) and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	No known impact
How does it have a positive or negative impact?	No known impact
What could be done to mitigate any adverse impact or further promote positive impact?	n/a
<b>Marriage/civil partnership</b>	
What is the impact on people who are married or in a civil partnership and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	No known impact
How does it have a positive or negative impact?	No known impact
What could be done to mitigate any adverse impact or further promote positive impact?	n/a
<b>Pregnancy/maternity</b>	
What is the impact on people who are pregnant women or those with a young child and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	n/a
How does it have a positive or negative impact?	No known Impact
What could be done to mitigate any adverse impact or further promote positive impact?	n/a
<b>Race</b>	
What is the impact on people from different races or ethnic groups and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	Due to the technical nature of the exercise overly long sentences or complicated word use may hinder accessibility, especially to those whose



## Appendix C - Equality Impact Assessment (EQIA)

	first or second language(s) are not English
How does it have a positive or negative impact?	No known impact
What could be done to mitigate any adverse impact or further promote positive impact?	Clear and simple language use is essential. A large enough language demographic may warrant translations being made.

### Sexual orientation

What is the impact on people according to their sexual orientation and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	No known impact
How does it have a positive or negative impact?	No known impact
What could be done to mitigate any adverse impact or further promote positive impact?	n/a

### Religion/belief

What is the impact on people according to their religion or belief and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	No known impact
How does it have a positive or negative impact?	No known impact
What could be done to mitigate any adverse impact or further promote positive impact?	n/a

### Rurality

Where people live is not a characteristic protected by law: but for Babergh and Mid Suffolk District Councils it is good practice to consider carefully how location may affect people's experience of a policy or service.	
What is the impact on people according to whether they live in an urban or rural environment and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	As the consultation relies on paper responses the process is heavily reliant on the post service, which may in some cases only be delivered once per week.
How does it have a positive or negative impact?	Negative
What could be done to mitigate any adverse impact or further promote positive impact?	Public Consultation was extended as the time frame was considered insufficient, in addition electronic responses were accepted by email and forms were provided on the Council website.

### Making Decisions

Having completed this equality impact assessment indicate which decision is recommended to be taken.	
Should the policy or service be implemented as the correct course of action?	That the recommendations in the report are implemented
Should the policy or service be amended as suggested by the report so that mitigating actions are taken to address an adverse or negative impact on any characteristic?	Mitigations have already been put in place where possible, others are noted for future use.
Should the policy or service be reviewed and revised more significantly to take into account its impact on different groups?	The process is reviewed at each iteration.

## Appendix C - Equality Impact Assessment (EQIA)

Should the policy or service not be actioned as there are too many negative impacts?	no
--	----

Monitoring Impact	
Assessing the impact on equality is an ongoing process that does not end once a policy or service had been agreed or implemented.	
How frequently will the policy or service be reviewed?	Legislative guidance 10-15 years and when petitioned by a qualifying petitioner.
Who will be involved?	Members, district, town and parish councils. Acting returning officers, MP's, businesses, members of the public and disability groups
Will there need to be an action plan completed for any amendments?	No
What further evidence or consultation will be needed to check that the policy or service is working well?	The process involves multiple consultation and these are used as checks and balances in the duration of the exercise.

Completion	
Authors signature	<i>Patrick Richardson-Todd</i>
Date of completion	24/01/2024

Additional sources of data:

<http://www.suffolkobservatory.info/Default.aspx>

<http://www.nomisweb.co.uk/>

<https://www.ons.gov.uk/>

<http://suffolkcf.org.uk/publications/hidden-needs-2016/>

<https://www.nao.org.uk/>

[Guidance on community governance reviews \(lgbce.org.uk\)](http://www.lgbce.org.uk/)

[Local Government and Public Involvement in Health Act 2007 \(legislation.gov.uk\)](http://www.legislation.gov.uk/)

This page is intentionally left blank

# Agenda Item 13

## BABERGH DISTRICT COUNCIL and MID SUFFOLK DISTRICT COUNCIL

<b>TO:</b> BDC COUNCIL MSDC COUNCIL	<b>REPORT NUMBER:</b> <b>MC/23/48</b>
<b>FROM:</b> Chief Executive	<b>DATE OF MEETINGS:</b> 19 March 2024 20 March 2024

### DESIGNATION OF THE SECTION 151 OFFICER ROLE

#### 1. Purpose of Report

Section 151 of the Local Government Act 1972 places a legal requirement on the Council to have a Section 151 Officer in place. The purpose of this report is to approve the designation of the Section 151 Officer for Babergh and Mid Suffolk District Councils.

#### 2. Recommendation

- 2.1 That Karen Watling be appointed to the statutory role of 'Section 151 Officer' for Babergh and Mid Suffolk District Councils until the Director for Corporate Resources returns to their post in a full-time capacity.
- 2.2 That Melissa Evans, Director for Corporate Resources, be appointed to the statutory role of 'Section 151 Officer' for Babergh and Mid Suffolk District Councils immediately on her full-time return to work.

#### 3. Financial Implications

- 3.1 There are no additional financial costs of appointing Karen Watling as Section 151 officer as there is no financial remuneration attached to the appointment.

#### 4. Legal Implications

- 4.1 The rules governing the authority's financial administration are set out in the Council's Standing Orders, Contracts Procedure Rules and Financial Procedure Rules. These require, amongst other things, that the s.151 Officer be responsible for many of the obligations under the rules, including, for example, arrangements for the banking and drawing of cheques in the Council's name, which must bear the name of the s.151 Officer.
- 4.2 There are also other statutory requirements for the s.151 Officer under section 113 of the Local Government Finance Act 1988 (the "1988 Act"), in that the s.151 officer must be a member of one of a number of specified accountancy bodies.

Karen Watling is a full member of one of these specified bodies, the Chartered Institute of Public Finance and Accountancy (CIPFA) and is appropriately qualified to discharge the functions of the s.151 Officer.

s.114 of the 1988 Act, in that the s.151 Officer must make a public report in specified cases of actual or anticipated financial misconduct.

s.2(1) of the Local Government and Housing Act 1989, the effect of which is to make the s.151 Officer a statutory chief officer and, therefore, a politically restricted post.

s.5 of the Local Government and Housing Act 1989 whereby the post of Monitoring Officer cannot also be held by the s.151 Officer.

## **5. Risk Management**

5.1 Key risks are set out below:

Risk Description	Likelihood	Impact	Mitigation Measures
It is a statutory duty to appoint a Section 151 Officer to undertake the role as set out in Section 151 of the Local Government Act 1972 and subsequent legislation.	Low	High	In the absence of the Director for Corporate Resources an interim Section 151 Officer has been appointed to maintain the financial affairs of the council

## **6. Consultations**

6.1 The Finance Portfolio Holders have been consulted.

## **7. Equality Analysis**

7.1 N/A

## **8. Key Information**

8.1 Section 151 of the Local Government Act 1972 requires that every local authority shall make arrangements for the proper administration of their financial affairs and appoint one of their Officers to have responsibility for the administration of those affairs. It places a legal requirement on the Council to have a s.151 Officer in place.

8.2 The Director of Corporate Resources, the council's permanent s.151 Officer, is currently on a period of long-term absence. Ms Watling has been covering the post as the interim Corporate Manager: Finance, which is the designated Deputy s.151 Officer post. Due to importance of the s.151 role, and the uncertainty of when the Director of Corporate Resources will be able to fully resume their duties, it is recommended that Ms Watling be appointed as s.151 Officer rather than continuing as the Deputy s.151 Officer. This will provide better governance and better ensure proper administration of the Councils' finances pending the full-time return of the Director of Corporate Resources.

8.3 Ms Watling, as reported above, is a fully qualified member of CIPFA and has held the s.151 Officer role at Norwich City Council (May 2017 to November 2019), Harborough District Council (December 2019 to April 2020) and South Somerset District Council (March 2021 to March 2023).

She has also been the Deputy s.151 Officer at Islington Council, Southwark Council, East Herts District Council, and Pendle Borough Council.

8.4 The designation as Section 151 Officer requires the formal agreement of Council.

**9. Appendices**

None.

**10. Background Documents**

None.

Authorship: Jan Robinson Head of Governance and Civic Office. 29 February 2024

This page is intentionally left blank

# Agenda Item 14

## MID SUFFOLK DISTRICT COUNCIL

<b>TO: Council</b>	<b>REPORT NUMBER: MC/23/49</b>
<b>FROM: Cllr Andrew Mellen – Leader of the Council</b>	<b>DATE OF MEETING: 20 March 2024</b>
<b>KEY DECISION REF NO. N/A</b>	

### REVISED PAY POLICY STATEMENT

#### 1. PURPOSE OF REPORT

- 1.1 The Councils are required to produce a Pay Policy Statement for each financial year under Section 38(1) of the Localism Act 2011. **The Pay Policy Statement being recommended for adoption is attached at Appendix A.** Babergh and Mid Suffolk District Councils have a single organisational structure with harmonised pay, grades, terms and conditions of service and have a single pay policy statement which covers both Councils. This report contains details of the Councils' 2024/25 pay policy statement for Councillors to consider and approve.

Under the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, the Councils are required to report on their gender pay gap. The report based on data as of 31st March 2023 has been prepared, and this, with accompanying narrative, will be published on both the Councils' websites under the transparency requirements. The date for reporting is 31<sup>st</sup> March 2024. As the two Councils are sovereign bodies, a report must be published for each Council; but the combined data is more relevant due to the workforce being fully integrated. This report does not have to be approved by Council.

#### OPTIONS CONSIDERED

- 1.2 Approving the Councils' annual pay policy statement is a statutory requirement; therefore, no other options are appropriate in respect of this.
- 1.3 Publishing the Councils' gender pay gap is a statutory requirement; therefore, no other options are appropriate in respect of this.

#### 2. RECOMMENDATIONS TO COUNCIL

- 2.1 That the pay policy statement as set out in Appendix A be approved.
- 2.2 That publication of the Council's gender pay gap, as of 31<sup>st</sup> March 2023, be noted.
- 2.3 That the payment rates for carrying out election duties as set out in Appendix C be noted.



## REASON FOR DECISION

To bring together all the relevant information to enable Councillors to approve the Council's pay policy statement. This must be formally approved by Full Council.

### 3. KEY INFORMATION

- 3.1 The Localism Act 2011 and supporting guidance provides information and detail on the matters that must be included within this statutory pay policy. However, they also emphasise that each local authority has the autonomy to take its own decisions on pay and pay policies. The Pay Policy Statement must be formally approved by Full Council. The statement must be published on the Councils' websites, and when setting the terms and conditions of those in chief officer posts, the policy must be complied with.
- 3.2 In the context of managing scarce public resources, remuneration at all levels needs to be adequate to secure and retain high quality employees, but at the same time needs to recognise that it is public money.
- 3.3 This Pay Policy Statement includes a policy on:
- Level and elements of remuneration for each chief officer.
  - The remuneration of the Councils' lowest paid employees.
  - The relationship between the remuneration of the Councils' chief officers and other officers.
  - Other specific aspects of chief officers' remuneration, use of performance related pay and bonuses, termination payments and transparency.
- 3.4 The draft Pay Policy Statement at Appendix A has been amended as follows:
- following the pay and reward review completed during 2023, and changes to the national living wage, the Councils' lowest paid employees are now paid at Grade 2 and the previous Grade 1 has been deleted.
  - following the chief officer pay review conducted by East of England Local Government Association in 2021, and national and regional benchmarking of shared Chief Executive roles in 2023 (see Appendix B) the salary range for the joint Chief Executive role has been updated.
- 3.5 Also, under the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, the Councils are required to report on their gender pay gap. The report based on data as of 31st March 2023 has been prepared, and this, with accompanying narrative, will be published on both the Councils' websites under the transparency requirements by 31st March 2024.

As the two Councils are sovereign bodies, it is a requirement to publish a report for each council, but the combined data is more relevant due to the workforce being fully integrated. This report does not have to be approved by Council, but when published will be available on the Council's website.

#### **4. Payments for those carrying out election duties**

- 4.1 The Elections Rates of Pay is attached as Appendix C.
- 4.2 The Government have devised a set of pay bands that apply to all polls across Great Britain paid for by them. These pay bands have been calculated based on data provided by the national Elections Funding Working Group and in turn uplifted and updated to reflect additional responsibilities introduced by the Elections Act 2022 as well as changes to average public sector pay and national minimum wage.
- 4.3 The pay bands set out a range of daytime hourly rates for each role that can be reimbursed by central Government.
- 4.4 It is proposed to adopt these same pay bands for local elections and link them to the nationally negotiated annual increase for inflation.

#### **5. LINKS TO THE STRATEGIC PLAN**

- 5.1 The Pay Policy Statement is one of a range of factors that support the attraction and retention of employees with the right skills, knowledge and experience to deliver the outcomes and outputs in the Councils' new Strategic Plans that were adopted in January 2024.

#### **6. FINANCIAL IMPLICATIONS**

- 6.1 The amended Joint Chief Executive salary range in the Pay Policy Statement is based upon the average salary range for such roles in the Eastern region. The additional cost to each Council at 2023/24 pay levels, including oncosts of 37%, is £3034 per Council. This figure includes backdating to 01.04.23 In line with the principles applied to the wider staff pay and reward review. As with all officer roles, progression up the spinal column points in future years is subject to an annual performance review.
- 6.2 The Chief Executive recently reviewed the structure of the Senior Leadership Team, reducing from 9 Directors to 7 and increasing from 1 to 2 Strategic Directors (Deputy Chief Executive and soon to be recruited Chief Operating Officer). These changes result in an overall saving of up to £118,000 across both Councils (£59,000 each) in the costs of the Senior Leadership Team (based on full year effect and 2023/24 pay levels). It should also be noted that 50% of one of the 7 remaining Director posts is funded by the Integrated Care Board (the health system).

#### **7. LEGAL IMPLICATIONS**

- 7.1 Under Section 38(1) of the Localism Act councils are required to produce an annual Pay Policy Statement that is approved by Council and published. It should set out:
- The remuneration of its chief officers;
  - The remuneration of its lowest paid employees; and
  - The relationship between the remuneration of the Councils' chief officers and others.
- 7.2 Under the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, the Councils are required to report on their gender pay gap.

## 8. RISK MANAGEMENT

8.1 This report is not directly linked with the Councils' Corporate / Significant Business Risks but the key risks are set out below:

<b>Risk Description</b>	<b>Likelihood</b>	<b>Impact</b>	<b>Mitigation Measures</b>
If the salary ranges for the chief officers are set too low to attract suitable candidates or too high, then it could result in failure to recruit, or attract adverse publicity	Probable - 3	Bad - 3	Implement the review of salary ranges for all chief officers based upon the EELGA review and national benchmarking.
If the pay policy legal framework is not complied with, then it could make any appointments null and void.	Unlikely - 2	Bad - 3	Formal approval required and through annual reviews.
If the pay policy is not applied fairly to all staff, then this could lead to equal pay claims which could also result in successful tribunal claims, leading to reputational damage and costs to the organisation.	Unlikely - 2	Bad - 3	HR involvement to ensure that policy is applied equally.

## 9. CONSULTATIONS

9.1 The trade unions have been informed of the contents of the pay policy, but as there are no significant changes there is no requirement to formally consult.

## 10. EQUALITY ANALYSIS

10.1 An Equality Impact Assessment is not required for the pay policy as it is substantively the same as in previous years. An Equality Impact Assessment will be carried out on any new pay and reward policy or process that is proposed.

10.2 The publication of the pay policy statement supports the Councils in delivering its equality duty and links closely with the duty to publish workforce data such as the gender pay gap.

## 11. ENVIRONMENTAL IMPLICATIONS

11.1 None.

## 12. APPENDICES

Title	Location
Appendix A – Babergh and Mid Suffolk District Councils’ Revised Pay Policy Statement	Attached
Appendix B – Babergh and Mid Suffolk District Councils Pay Report 2021 (East of England Local Government Association) and National Benchmarking of Joint Chief Executive salary ranges for 2023/24.	Attached
Appendix C – Elections Rates of Pay	Attached

## 1. REVISED PAY POLICY STATEMENT

### Requirements

- 1.1 Councils are required to produce a Pay Policy Statement for each financial year under Section 38 of the Localism Act 2011.
- 1.2 Babergh and Mid Suffolk District Councils ('the Councils') have a single organisational structure with harmonised pay, grades, terms and conditions of service and have a single pay policy statement that covers both Councils.
- 1.3 The Localism Act 2011 and supporting guidance provides information and detail on the matters that must be included within this statutory pay policy. However, they also emphasise that each local authority has the autonomy to take its own decisions on pay and pay policies. The Pay Policy Statement must be formally approved by both Full Councils. The statement must be published on the Councils' websites, and when setting the terms and conditions of those in chief officer posts, the policy must be complied with.
- 1.4 In the context of managing scarce public resources, remuneration at all levels needs to be adequate to secure and retain high quality employees, but at the same time needs to recognise that this is public money.
- 1.5 The Pay Policy Statement must include a policy on:
  - Level and elements of remuneration for each chief officer (for the Councils this is defined as the Senior Leadership Team).
  - The remuneration of the Councils' lowest paid employees.
  - The relationship between the remuneration of the Councils' chief officers and other officers.
  - Other specific aspects of chief officers' remuneration, use of performance related pay and bonuses, termination payments and transparency.

### Remuneration of employees who are not chief officers

- 1.6 For employees subject to the National Agreement on Pay and Conditions of Service of the National Joint Councils for Local Government Services (commonly known as the 'Green Book'), the Councils use 7 pay grades. Posts have been allocated to a pay band through a process of job evaluation.
- 1.7 Each grade has between 5 and 8 increments. The value of the pay increments (known as the 'Spinal Column Points') increases when the Councils are notified of pay awards by the National Joint Council (NJC) for Local Government Services. In addition, the Councils review all pay levels every April to determine who is eligible for incremental progression.
- 1.8 There is also a group of staff on the 'National Agreement on Pay and Conditions of Services for Local Authority Craft and Associated Employees (commonly known as the 'Red Book'). The Councils use a spot salary payment for this staff group which as of 31<sup>st</sup> March 2024 is £32,715.

- 1.9 For the purposes of this Policy Statement, employees on the lowest increment within the Grade 2 pay band are defined as our lowest paid employees. This is because no employee of the Councils is paid at an hourly salary level that is lower than this grade. As at 31<sup>st</sup> March 2024, the full time equivalent (FTE) annual value of the lowest increment used within Grade 2 is £23,500. This rate exceeds the National Minimum Wage and the Living Wage set by the Living Wage Foundation. Apprentices are paid £11.41 per hour which is significantly higher than the National Minimum Wage rates for apprentices. This enables the Councils to attract and retain more apprentices.

### **Remuneration of chief officers**

- 1.10 The Councils share the following posts, which fall within the definition of 'Chief Officer' for the purposes of this Pay Policy:
- Chief Executive (the Councils' Head of Paid Service) x 1
  - Deputy Chief Executive x 1
  - Directors x 7
- 1.11 The Chief Executive recently reviewed the structure of the Senior Leadership Team, reducing from 9 Directors to 7 and increasing from 1 to 2 Strategic Directors (Deputy Chief Executive and soon to be recruited Chief Operating Officer). These changes result in an overall saving of up to £118,000 across both Councils (£59,000 each) in the costs of the Senior Leadership Team. It should also be noted that 50% of one of the 7 remaining Director posts is funded by Health.
- 1.12 The Chief Executive post was previously evaluated in 2016 and so re-evaluated again in 2023 as part of the all staff pay & reward review.
- 1.13 The remaining chief officer posts were evaluated in 2021 using the Local Government Senior Managers' evaluation scheme. The pay grades for these posts were established and adopted in April 2022 following recommendations by East of England Local Government Association (EELGA) who carried out benchmarking on salary levels within the sector.
- 1.14 The value of the incremental points (Spinal Column Points) within each of the pay grades will be increased by the pay awards notified from time to time by the Joint Negotiating Committees for Local Authorities.
- 1.15 Chief Executive
- The Chief Executive is the Councils' Head of Paid Service. The annual full time equivalent (FTE) salary range for the grade of this post is £145,935 - £170,775. There are five incremental points in the grade.
  - It is the Councils' policy that the FTE salary range for the post of Chief Executive will normally be no greater than 8 times the FTE salary range of a Grade 2 'Green Book' employee. This is well within the nationally recommended multiplier of no more than 12 times the lowest paid employee. The FTE salary for the Chief Executive is 7 times that of a grade 2 salary and does not exceed the Councils' policy.
  - The Chief Executive also receives a Returning Officer fee in respect of District and Parish Council Elections, and a Deputy Returning Officer fee for County Council elections.

Each Council has agreed a scale of fees for this function dependent upon the number of contests at any given election. Fees for conducting UK Parliamentary Elections, Police & Crime Commissioner Elections and national referenda are determined by way of a Statutory Instrument. An updated schedule of fees for those carrying out election duties are included at section C of this report.

#### 1.16 Strategic Directors (Deputy Chief Executive & Chief Operating Officer)

- The Deputy Chief Executive reports to the Chief Executive as will the soon to be recruited Chief Operating Officer. As of 31 March 2024, the annual FTE range for the Deputy Chief Executive is £105,880 to £126,656. There are five incremental points in the grade. The Chief Operating Officer will also be paid within this salary range.
- It is the Councils' policy that the FTE salary range for the Deputy Chief Executive & Chief Operating Officer will normally be no greater than 7 times FTE salary range of a Grade 2 'Green Book' employee. The FTE salary for these Strategic Directors is 5 times that of grade 2 and therefore does not exceed the Councils' policy.

#### 1.17 Directors

- The Directors report to the Strategic Director(s) and Chief Executive. As of 31 March 2024, the annual FTE salary range for the Director grade is £83,026.00 to £95,492.00. There are five incremental points in this grade.
- It is the Councils' policy that the FTE salary range for the Director posts will normally be no greater than 5 x the FTE salary range of a Grade 2 'Green Book' employee. The FTE salary for Directors is 4 times a grade 2 and therefore does not exceed the Councils' policy.
- The Councils' Monitoring Officer and Section 151 Officer are shared between both Councils. There is no additional allowance paid for the Councils' Monitoring Officer or for the Section 151 Officer for undertaking statutory officer roles across two councils as this is built into their salary.

### **General principles applying to remuneration of chief officers and employees**

#### 1.18 Recruitment

- On recruitment individuals (including chief officers) will be placed on an appropriate pay increment within the pay grade for the post that they are appointed to. Access to appropriate elements of the Councils' Relocation Scheme may also be granted in certain cases when new starters need to move to the area.

#### 1.19 Pay Increases

- The value of pay increments within the grades may increase because of the Joint Negotiating Committee for Local Authorities negotiating pay rises. Individuals (including chief officers) may also progress within their pay grade. Individuals cannot progress beyond the top increment within their pay grade. Progression arrangements within the grade will be dependent upon competency and performance.

## 1.20 Termination of Office/Employment

- On ceasing to hold office or be employed by the Councils, individuals (including chief officers) will only receive compensation:
  - in circumstances that are relevant (e.g., redundancy);
  - that is in accordance with council policies on how to exercise the various employer discretions provided by the Local Government Pension Scheme (LGPS); and/or
  - that complies with the specific term(s) of a settlement agreement.

## 1.21 Additional Remuneration

- The Councils pay market forces supplements to some posts. A policy has been agreed to ensure that these are relevant, appropriate, and regularly reviewed.
- The Councils do not pay honoraria awards.
- The Councils pay Essential and Casual Car User allowances in accordance with agreed policy. Following a review in 2019/20 Essential Car User allowances are now only paid to grades 7 and below. The rates for essential car user mileage are based on the rates set by the National Joint Consultative Council for Local Government Services. The Councils only apply the rates up to a 1199cc engine size; and do not pay the 1200cc to 1450cc (i.e. the top band). The rates for casual car user mileage are based on the rates set by HMRC. There are also rates in force for individuals who use their bicycle or motorcycle which are also based on the rates set by HMRC.
- Subsistence allowances that are paid are in accordance with our subsistence policy.
- None of the Councils' employees are paid a bonus or any other performance-related pay.

## **Gender Pay Gap**

1.22 Under the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, the Councils are required to report on their gender pay gap. The report based on data as of 31 March 2023 has been prepared, and this, with accompanying narrative, will be published on both the Councils' websites under the transparency requirements. The date for reporting is 31 March 2024.

1.23 As the two Councils are sovereign bodies, a report must be published for each Council, but the combined data is more relevant due to the workforce being fully integrated. This report does not have to be approved by Council, but when published will be available on each Council's website.



## Babergh and Mid Suffolk District Councils Pay Report 2021 (EELGA)

<https://baberghmidsuffolk.moderngov.co.uk/documents/s24267/Appendix%20A.pdf>

There are 14 joint district / borough Chief Executives across England. As set out in the table below there are two other joint district / borough Chief Executives in the Eastern region, one in Essex and one in Norfolk. The salary range contained in Appendix A places Babergh and Mid Suffolk's joint Chief Executive role's starting salary range 6<sup>th</sup> out of 14; and 4<sup>th</sup> out of 14 in terms of the top of the salary range.

<b>All District &amp; Borough Councils with joint Chief Executives</b>	<b>Chief Executive (or equivalent) salary range for 2023/24</b>
Adur and Worthing	£140,760 - £162,831
Boston, East Lindsey and South Holland	£122,443 - £150,053
Broadland and South Norfolk District Councils	£144,900 - £173,880
Brentwood Borough Council and Rochford District Council	£146,892 - £167,592
Bromsgrove and Redditch	£142,830 - £148,056
Cannock Chase District Council and Stafford Borough Council	£143,950
Chorley Council and South Ribble Borough Council	£154,319
Eastbourne Borough Council and Lewes District Council	£145,191 - £156,647
Guildford Borough Council and Waverley Borough Council	£161,072
Malvern Hills District Council and Wychavon District Council	£141,933 - £152,816
South Oxfordshire and Vale of White Horse	£173,880
Staffordshire Moorlands District Council and High Peak Borough Council	£168,660 - £182,729
South Hams District Council and West Devon Borough Council	£139,725 - £150,075

## Appendix C - Elections Rates of Pay

Pay Band A £11.44 - £15.12		
Roles	Rate of Pay	SCP
Casual admin support	£14.91	17
Polling Station - ballot box/equipment issuing assistants	£14.91	17
Postal vote - opening and checking assistant	£14.91	17
Poll Clerks	£14.91	17
Ballot Box receipt assistant	£14.91	17
Count setup/take down assistant	£14.91	17
Count and verification assistants	£14.91	17
Count Security	£14.91	17
Postal vote security	£14.91	17
Reception Staff	£14.91	17
Printing co-ordinator (e.g. printing of letters)	£14.91	17

Pay Band B £13.44 - £17.92		
Roles	Rate of Pay	SCP
Polling station ballot box/equipment issuing supervisors	£17.60	25
Postal vote - opening and checking supervisor	£17.60	25
Postal vote - opening and checking supervisor (Saturday and night)	£26.40	25
Postal vote - opening and checking supervisor (Sun)	£35.20	25
Ballot box receipt supervisor	£26.40	25
Count staff - IT support	£14.91	17
Postal vote - IT support (signature verification)	£14.91	17
Count setup/take down supervisor	£17.60	25
Count and verification team leader	£17.60	25
Count and verification team leader (Night)	£26.40	25
Collection and prep of equipment	£14.91	17

Pay Band C £15.68 - £19.60		
Roles	Rate of Pay	SCP
Presiding Officer	£19.00	28
Count and verification supervisor	£19.00	28
Count and verification supervisor (Night)	£28.50	28
Staff payment/payroll	£17.12	24
Poll card, postal votes and ballot papers - running data, checking and proofing	£17.60	25
Postal vote - signature adjudicators	£17.60	25
Postal vote - signature adjudicators (Saturday & Night)	£26.40	25
Postal vote - signature adjudicators (Sunday)	£35.20	25
Top table assistants/data officer	£17.60	25
Top table assistants/data officer (night)	£26.40	25
Media handling/comms	£17.60	25

Pay Band D £16.80 - £29.12		
Roles	Rate of Pay	SCP
Count Manager	£29.11	46
Polling Station Inspector	£18.06	26
Postal Vote - opening session manager	£26.71	43

This page is intentionally left blank