



# EAST CAMBRIDGESHIRE DISTRICT COUNCIL

THE GRANGE, NUTHOLT LANE,  
ELY, CAMBRIDGESHIRE CB7 4EE  
Telephone: 01353 665555

**MEETING: FINANCE & ASSETS COMMITTEE**

**TIME: 4:30pm**

**DATE: Monday, 25<sup>th</sup> January 2021**

**VENUE: PLEASE NOTE: Due to the introduction of restrictions on gatherings of people by the Government due to the Covid-19 outbreak, this meeting will be conducted remotely facilitated using the Zoom video conferencing system. There will be no access to the meeting at the Council Offices, but there will be Public Question Time at the commencement of the meeting in accordance with the Council's Public Question Time Scheme, as modified for remote meetings. Details of the public viewing arrangements for this meeting are detailed in the Notes box at the end of the Agenda.**

**ENQUIRIES REGARDING THIS AGENDA: Tracy Couper**

**DIRECT DIAL: (01353) 665555 EMAIL: [tracy.couper@eastcambs.gov.uk](mailto:tracy.couper@eastcambs.gov.uk)**

## **Membership:**

### **Conservative Members**

David Brown (Chairman)  
David Ambrose Smith  
Ian Bovingdon (Vice Chair)  
Bill Hunt  
Alan Sharp

### **Liberal Democrat Members**

Alison Whelan (Lead Member)  
Charlotte Cane  
Simon Harries  
John Trapp

### **Substitutes:**

Anna Bailey  
Dan Schumann  
Jo Webber

### **Substitutes:**

Matt Downey  
Gareth Wilson  
Christine Whelan

### **Lead Officer:**

Emma Grima, Director Commercial

**Quorum: 5 Members**

## **AGENDA**

### **1. Public Question Time**

The meeting will commence with up to 15 minutes public question time

### **2. Apologies and Substitutions**

**[oral]**

**3. Declarations of Interest**

To receive declarations of interest from Members for any items on the Agenda in accordance with the Members Code of Conduct. **[oral]**

**4. Minutes**

To confirm as a correct record the Minutes of the meeting of the Committee held on 26<sup>th</sup> November 2020

**5. Chairman's Announcements**

**ACCOUNTS & AUDIT ITEMS**

**6. External Audit - Annual Audit Letter 2019/20**

**ITEMS FOR DECISION**

**7. On-Street Parking Enforcement**

**8. Climate Change Supplementary Planning Document – Draft for Adoption**

**9. 2021/22 Annual Treasury Management Strategy, Minimum Revenue Provision Policy Statement & Annual Investment Strategy**

**10. Revenue Budget, Capital Strategy & Council Tax 2021/22**

**11. Equalities Policy**

**12. Covid-19 Working Party**

(i) Impacts of Covid-19 on ECDC BAME Population

(ii) Notes of Working Party Meeting held on 25 November 2020

**ITEMS FOR NOTING**

**13. CIL/S106 Income and Expenditure Update**

**14. Finance Report**

**15. ARP Joint Committee Minutes**

To receive the Minutes of the meeting of the ARP Joint Committee held on 8 December 2020

**16. Forward Agenda Plan**

## **EXCLUSION OF THE PUBLIC INCLUDING REPRESENTATIVES OF THE PRESS**

That the press and public be excluded during the consideration of the remaining items because it is likely, in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the public were present during the items there would be disclosure to them of exempt information of Categories 1 & 3 of Part I Schedule 12A to the Local Government Act 1972 (as amended).

### **17. Appointments, Transfers, Resignations**

### **18. Exempt Minutes**

To receive the Exempt Minutes of the meeting of the Finance & Assets Committee held on 26<sup>th</sup> November 2020

#### **NOTES:**

1. Since the introduction of restrictions on gatherings of people by the Government in March 2020, it has not been possible to hold standard face to face public meetings at the Council Offices. This led to a temporary suspension of meetings. The Coronavirus Act 2020 now has been implemented, however, and in Regulations made under Section 78 it gives local authorities the power to hold meetings without it being necessary for any of the participants or audience to be present together in the same room.  
The Council has a scheme to allow Public Question Time at the start of the meeting using the Zoom video conferencing system. If you wish to ask a question or make a statement, please contact Tracy Couper, Democratic Services Manager [tracy.couper@eastcambs.gov.uk](mailto:tracy.couper@eastcambs.gov.uk) by 5pm on Thursday 21 January 2021. If you are not able to access the meeting remotely, or do not wish to speak via a remote link, your question/statement can be read out on your behalf at the Committee meeting.
2. A live stream of the meeting will be available via YouTube at <https://www.eastcambs.gov.uk/meetings/finance-assets-committee-25012021>
3. Reports are attached for each agenda item unless marked "oral".
4. If required all items on the agenda can be provided in different formats (e.g. large type, Braille or audio tape, or translated into other languages), on request, by calling Main Reception on (01353) 665555 or e-mail: [translate@eastcambs.gov.uk](mailto:translate@eastcambs.gov.uk)
5. If the Committee wishes to exclude the public and press from the meeting a resolution in the following terms will need to be passed:  
"That the press and public be excluded during the consideration of the remaining items because it is likely, in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the public were present during the item there would be disclosure to them of exempt information of Categories X Part I Schedule 12A to the Local Government Act 1972 (as amended)."



EAST  
CAMBRIDGESHIRE  
DISTRICT COUNCIL

Minutes of a remote meeting of the Finance & Assets Committee held at 4.30pm on Thursday, 26<sup>th</sup> November 2020.

**PRESENT**

Councillor David Brown (Chairman)  
Councillor Ian Bovingdon (Vice Chairman)  
Councillor David Ambrose Smith  
Councillor Simon Harries  
Councillor Bill Hunt  
Councillor Alan Sharp  
Councillor John Trapp  
Councillor Alison Whelan  
Councillor Gareth Wilson (substitute for Councillor Charlotte Cane)

**OFFICERS**

Emma Grima – Director Commercial  
Ian Smith – Finance Manager  
Sally Bonnett – Infrastructure & Strategy Manager  
Maggie Camp – Legal Services Manager and Monitoring Officer  
Spencer Clark – Facilities and Open Spaces Manager  
Nicole Pema – HR Manager  
Anne Wareham – Senior Accountant  
Tracy Couper – Democratic Services Manager

**IN ATTENDANCE**

Phil Rose – Head of Development, East Cambs Trading Company  
Nigel Ankers – Finance Manager, East Cambs Trading Company  
Suresh Patel – Associate Partner, External Audit, Ernst & Young (EY)  
Jacob McHugh – External Audit, Ernst & Young (EY)  
Rachel Ashley-Caunt – Head of Internal Audit, LGSS

70. **PUBLIC QUESTION TIME**

No questions were submitted by members of the public.

71. **APOLOGIES AND SUBSTITUTIONS**

Apologies for absence had been submitted by Councillor Charlotte Cane and Councillor Gareth Wilson was substituting on her behalf.

72. **DECLARATIONS OF INTEREST**

Councillor Alison Whelan stated that she had sought advice from the Monitoring Officer regarding Agenda Item 20 – Assets Update, as she was a City of Ely Councillor, but had been advised that there was no requirement for her to leave the meeting for this item, as it was for noting only.

73. **MINUTES**

It was resolved:

That the Minutes of the meeting of the Committee held on 24<sup>th</sup> September 2020 be confirmed as a correct record and be signed by the Chairman.

74. **CHAIRMAN'S ANNOUNCEMENTS**

The Chairman made the following announcements:

'Can I remind Members that the closing date for the current round of Covid-19 discretionary business grants is 2<sup>nd</sup> December 2020. Please do all you can to encourage local businesses to consider applying before the deadline.

To aid discussions, I have invited Phil Rose, Head of Development and Nigel Ankers, Finance Manager at East Cambs Trading Company to this meeting and to contribute to relevant items.

Further to discussions at our previous meeting, I have asked Emma Grima, Director Commercial, to bring a paper to our January meeting regarding Contract Procedures, including whether the current procedures are fit for purpose.

Members can raise items for future meetings at Agenda Item 16 – Forward Agenda Plan.'

75. **EXTERNAL AUDIT – AUDIT RESULTS REPORT**

The Committee considered the Annual Results Report, previously circulated.

Members were informed that the Audit had been completed and an unqualified opinion on the authority's financial statements issued, subject to receipt of a signed copy of the Letter of Representation by the Section 151 Officer and the Chairman of this Committee. Audit adjustments had been identified in relation to the valuation of The Hive Leisure Centre (Property, Plant and Equipment); Pension Valuation; and the Going Concern Disclosure.

External Audit commented that this was a pleasing position and showed that the Finance function within the Council was operating effectively, despite the challenges of Covid-19. The statements on Pension Valuation, Property, Plant and Equipment Valuations and the Going Concern Disclosure, reflected the national situation and were likely to be in a number of authorities' accounts. With regard to the Value For Money finding, External Audit were satisfied that recommendations made during the 2019/20 year had been addressed.

The Chairman congratulated the Finance Manager and his Team for the ability to sign-off the accounts by the 30 November deadline, particularly having regard to the challenges resulting from the pandemic. He also expressed his thanks to External Audit for their work and co-operation. However, the Chairman expressed disappointment at the number of non-returned Related Party Transactions Disclosure Forms from Councillors and Officers and he stated that he would be pushing to ensure that these were returned on-time in the future.

Members concurred with the Chairman's comments and in response to a question by a Member, the Finance Manager explained the reasons for the overvaluation of The Hive Leisure Centre.

It was resolved:

That the Audit Results Report be received.

76. **STATEMENT OF ACCOUNTS 2019/20**

The Committee received a report containing the Statement of Accounts for 2019/20.

With regard to the Going Concern issue highlighted in the Note 32 of the Accounts, a Member commented that the sum in this Council's Surplus Savings Reserve put it in a stronger position compared to other Councils.

The Finance Team were commended for their work on the Accounts.

It was resolved:

That the 2019/20 Statement of Accounts, as set out in Appendix 1 to the submitted report, be approved subject to the Section 151 Officer, in conjunction with Ernst & Young (EY) and the Chairman of Committee, being authorised to make any final changes, as required, prior to final sign-off by EY on/or around the 30<sup>th</sup> November 2020.

77. **EXTERNAL AUDIT – FINANCIAL REPORTING COUNCIL (FRC) REPORT ON INSPECTION RESULTS OF MAJOR LOCAL AUDIT**

The Committee received an EY summary of the FRC report on the Inspection Results of Major Local Audit.

Suresh Patel from External Audit stated that this was the first time that the regulator's report had been published and was pleased to report that EY had been rated very favourably compared to other providers. This gave client authorities a good level of assurance with regard to the audits undertaken by EY.

It was resolved:

That the External Audit summary be noted.

78. **EXTERNAL AUDIT – INITIAL VIEW ON REDMOND REVIEW**

The Committee received an EY initial view on Redmond Review.

It was resolved:

That the External Audit summary be noted.

79. **PSAA AUDIT FEES – CONSULTATION RESPONSE**

The Committee considered a report containing the PSAA consultation paper on the proposed new system for fee variations for local authorities for their external audit service and a proposed response from this Council.

A Member expressed concern that the proposals would not solve the problems relating to the fee system, but merely make small adjustments to the rates. It was contended that there should be a fixed fee, rather than auditors seeking additional costs, as authorities needed a stable fee mechanism in the current and future climate.

The Finance Manager and Mr Patel acknowledged the comments but referred to the need for a review of scale fees to attract new entrants to the market, to enable investment in the training of staff and to ensure good quality audit.

It was resolved:

That the Finance Manager, in consultation with the Chairman of the Committee, be authorised to reply to the consultation as detailed in the submitted report.

80. **INTERNAL AUDIT PROGRESS REPORT**

The Committee considered a report advising Members of the work of Internal Audit completed during the period September to October 2020 and the progress against the Internal Audit Plan.

Rachel Ashley-Caunt summarised the content of the update report highlighting that at the time of reporting, 53% of assignments within the Plan were either complete, or in progress. Internal Audit were on track for delivery of the Plan and one audit of Building Control had been finalised, receiving a good level of assurance and had not highlighted any issues or weaknesses which would impact on the overall Internal Audit position.

In response to a question by a Member, Ms Ashley Caunt confirmed that many of the larger audits had been completed, with the smaller financial systems checks remaining, comprising shorter 5-6 day audits in most cases. A Member suggested that the estimated number of days for each audit be included in future progress reports, as previously.

Ms Ashley-Caunt stated that a significant review of the Internal Audit Plan was to be undertaken and that this Committee would be consulted on areas needing assurance in the forthcoming 12 months. Suggestions could be submitted by Members of the Committee to Ms Ashley-Caunt. In that connection, the Chairman asked that Internal Audit E-mail the Members of the Committee requesting suggestions and asking them to respond direct, copying-in the Chairman of the Committee.

It was resolved:

That the progress made by Internal Audit in the delivery of the Audit Plan and the key findings be noted.

81. **LOCAL COUNCIL TAX REDUCTION SCHEME & DISCRETIONARY BUSINESS RATE RELIEFS POLICY REVIEWS 2021/22**

The Committee received a report which reviewed the Council's Local Council Tax Reduction Support Scheme (LCTRS) and Discretionary Business Rate Reliefs Scheme.

Members concurred with the proposal that the current schemes should be retained at present to give consistency in these challenging times. In that context, Members asked if work had been carried out to try to model the impact of an increase in the number of claimants due to Covid-19 on the Council's finances. The Finance Manager confirmed that in his modelling for the 2021/22 Budget he had accounted for this and that the taxbase for the District actually had dropped as a consequence. The Finance Manager further agreed to provide information to Members of the Committee on the impact of the fluctuating earnings rule when making re-assessments due to change in circumstances.

A Member requested that references in the report to customers be amended to refer to residents.

**It was resolved to RECOMMEND TO COUNCIL:**

- (i) **That the LCTRS 8.5% benefit scheme, i.e. the maximum benefit to working age claimants is 91.5%, be retained for 2021/22 financial year.**
- (ii) **That the Council's policies with regard to Discretionary Business Rate Reliefs remain unchanged for 2021/22.**

82. **NOMINATION OF TRUSTEE TO EAST CAMBS CLT**

The Committee considered a report requesting the nomination of a Trustee to East Cambs Community Land Trust (CLT). The Chairman proposed the nomination of Councillor Anna Bailey, which was seconded by Councillor Bovingdon.

Members raised a number of questions regarding the CLT as follows:

- How long had it been in existence?
- What was the purpose and business of the CLT?
- Could any resident of the District become a Member?
- Why had no information on the CLT been submitted to this Committee before?

Some Members also expressed the view that it would be inappropriate for the Leader of the Council to be a Trustee of the CLT, as it should be an independent, citizen-led body.

The Director Commercial stated that the CLT had been established in 2017 and its objects and current Trustee arrangements were detailed in the submitted report. She agreed that a wider Briefing Paper on the CLT could be provided to Members of the Committee.



Some Members commented that the East Cambs CLT appeared to be different to the village/parish based CLTs such as Haddenham and that further information was required on the differences between the two types. A Member expressed an interest in becoming a Member of the CLT, but not a Trustee, and suggested that all Councillors should be given the opportunity to become Members, so that they had a say in its operation. A Member commented on the current lack of oversight of the operation and accounts of CLTs.

A discussion took place on the provision of affordable housing via the East Cambs CLT.

It was resolved:

- i That Councillor Anna Bailey be nominated as a Trustee to East Cambs Community Land Trust (CLT).
- ii That East Cambs CLT be included on the list of Outside Bodies.
- iii That a report providing information on East Cambs CLT be submitted to the next meeting of this Committee.

83. **PALACE GREEN HOMES (ECTC) – OFFICE ACCOMMODATION REVIEW (INTERIM REPORT)**

The Committee considered an interim report on the future office accommodation requirements of Palace Green Homes (ECTC).

It was reported that the current office lease at Fordham had a break option in December 2021, subject to six months notice, i.e. by June 2021. Therefore, further evaluation could be undertaken in the light of the anticipated Covid-19 recovery period. Members concurred with the reasonableness of this approach. In response to a question by a Member as to the reason for the review being submitted to this Committee, as the Trading Company was separate to the Council, it was reported that the request for the accommodation review had been made by the Council in its shareholder capacity.

It was resolved:

That the interim conclusions of the review of the future office accommodation requirements of Palace Green Homes (ECTC), as detailed in paragraphs 4.2 - 4.5 of the submitted report, be noted and a final report provided to this Committee by 31 May 2021.

84. **TREASURY OPERATIONS MID-YEAR REVIEW**

The Committee received a report which provided an update on the Council's 2020/21 Treasury Management Strategy Statement.

A Member commented that the report gave an interesting overview of the position in the wider world at present and that some of the assumptions made appeared over-optimistic and might need testing in the light of future developments.

In response to a question by a Member, the Finance Manager explained the background to the treatment of the ECTC loan as Capital Expenditure rather than an investment.

**It was resolved to RECOMMEND TO COUNCIL:**

**That the mid-year review of the Council's Treasury Management Strategy for 2020/21, as set out in Appendix 1 to the submitted report, be noted.**

*The meeting was adjourned at 18.02pm for a comfort break and re-convened at 18.08pm.*

86. **EAST CAMBRIDGESHIRE BUS SERVICES REVIEW**

The Committee considered a report to:

- (i) approve the Bus Services for East Cambs document for submission to CPCA;
- (ii) amend the Terms of Reference of the Working Party;
- (iii) note the Notes of the WP meetings held on 8 October and 12 November 2020.

The Infrastructure and Strategy Manager, Sally Bonnett, reported that the draft submission to the Combined Authority attached at Appendix 2 had been considered in detail and amended by the Working Party. The Chairman of the Working Party Councillor Alan Sharp, thanked Ms Bonnett for her work to produce the revised submission in a very short timescale and the Working Party Members for working effectively together to produce an excellent document, which also had input from the first Member Seminar held remotely via Zoom.

Members stated that this was a good example of collaborative working and there had been a clear consensus on what was realistically achievable for a rural District like East Cambridgeshire. This Council needed to clearly influence future public transport provision and to dovetail this with the walking and cycling strategy. Members expressed the view that bus services needed to be regular and to extend into the evening to support the more disadvantaged and vulnerable groups and encourage working people to use them. Also, consideration needed to be given to routes that served the sites people wished to travel to for employment purposes not just shopping and recreation.

It was resolved:

- i) That the Notes of the meetings of the East Cambs Bus Services Review Working Party held on 8<sup>th</sup> October 2002 and 12<sup>th</sup> November 2020, attached as Appendix 1 to the submitted report, be noted.
- ii) That approval be given to the draft New Bus Services for East Cambridgeshire, attached as Appendix 2 to the submitted report, for submission to the Cambridgeshire and Peterborough Combined Authority (CPCA) (with any minor editorial or presentation improvements delegated to officers, in consultation with the Chairman of Finance & Assets Committee, prior to submission).

- iii) That the amendment to the Terms of Reference for the East Cambs Bus Services Review Working Party, attached as Appendix 3 to the submitted report be approved.

87. **CIL ALLOCATION**

The Committee considered a report requesting the allocation of Community Infrastructure Levy (CIL) for the expansion of St Mary's Medical Practice, Ely. The Director Commercial reported that Planning consent for the development had been granted on the preceding day.

Members expressed their support for the project referring to the benefits in terms of improved health provision for Ely and the surrounding area, particularly in the light of the North Ely development, and stating that it was a genuine infrastructure scheme on which the funding could be appropriately used.

It was resolved:

That approval be given to the allocation of £750,000 for the expansion of St Mary's Medical Practice, Ely, as set out in paragraph 4.2 of the submitted report.

88. **GENDER PAY REPORTING**

The Committee received a report containing measurable data on Gender Pay for the Council. Members commended the HR Manager for the production of the report, since the Council was not legally required to do so as a body with under 250 employees.

A Member expressed concern at the worsening position on Gender Pay within the Council and asked if there were reasons for this. The HR Manager stated that the Council already was following the recommended good practices in Government guidance. A Member suggested that due to the smaller size of this Council compared to other authorities, a small change in numbers had a higher percentage impact on the overall figures. However, it was suggested that the Council may need to re-visit the effectiveness of its HR practices, to ensure that everything possible was being done to reduce the gap.

It was resolved:

That the content of the submitted report be noted.

89. **FINANCE REPORT**

The Committee received a report which provided budget monitoring information for services under the Finance & Assets Committee and the Council as a whole as part of the Committee's overall responsibility for finance.

The Finance Manager highlighted revised appendices circulated to Members of the Committee.

He also referred to the Government Spending Review which had announced a public sector pay pause, additional Covid-19 funding and Homelessness funding,

and a 2% Council Tax limit. The Local Government Financial Settlement was expected in week commencing 14 December and the above would be built into the MTFs to be submitted to this Committee in January.

Some Members commended the sound financial position of the Council despite the current uncertainties, but other Members warned against complacency due to those uncertainties. In that connection, a Member expressed concern at the length of time it had taken to notice the despatch of the incorrect appendices and the limited time that this had given to Members of the Committee to examine these.

It was resolved:

- (i) That the Committee's projected year end underspend of £102,000 when compared to its approved revenue budget of £5,021,167 be noted.
- (ii) That the Council's projected year end underspend of £281,500 when compared to its approved revenue budget of £13,644,206 be noted.
- (iii) That the expected underspend for this Committee of £100,000 compared to its approved Capital Budget of £8,048,680, be noted.
- (iv) That the overall position for the Council on Capital of a projected outturn of £9,033,166, which is an underspend of £2,755,950 when compared to its revised budget of £11,789,116, be noted.

90. **ASSETS UPDATE**

The Committee received a report which provided an update on Council-owned assets.

The Facilities and Open Spaces Manager updated the Committee on the current position regarding the condition survey for the Maltings Cottage, Ely and the Ely Museum project. The condition survey now had been completed and recommendations would be submitted to the next meeting of this Committee. The building work to Ely Museum was almost complete and the hoardings in the rear car park of The Grange should be removed in the forthcoming week. Therefore, it was anticipated that this car park would be available for usage again in mid-December. In response to a request by Members, the Facilities and Open Spaces Manager agreed to provide details on the actual works undertaken at the Museum to a future meeting of the Committee.

With regard to questions by Members on the re-opening of public conveniences and playgrounds, the Facilities and Open Spaces Manager explained the measures undertaken to ensure that they were Covid-19 safe and the high usage of play areas being experienced due to them being a valuable source of external recreation for families in the current climate.

It was resolved:

That the update on Council owned assets be noted.

91. **COVID-19 WORKING PARTY**

It was resolved:

That the Notes of the meeting of the Covid-19 Working Party held on 30 September 2020 be noted.

92. **ANGLIA REVENUES PARTNERSHIP JOINT COMMITTEE MINUTES**

The Committee received the Minutes of the meeting of the ARP Joint Committee held on 15<sup>th</sup> September 2020. The Chairman congratulated Councillor David Ambrose-Smith on his appointment as Vice-Chairman of the Joint Committee.

Councillor Ambrose-Smith commended ARP on the large amount of work it had undertaken during the period of the Covid-19 outbreak. However, Members highlighted the ongoing issues likely to arise as a result of the pandemic and commented that matters such as bad debt write-offs and increases in benefits payments and arrears needed rigorous oversight.

It was resolved:

That the Minutes of the meeting of the ARP Joint Committee held on 15<sup>th</sup> September 2020 be noted.

93. **FORWARD AGENDA PLAN**

The Committee received its Forward Agenda Plan. The Chairman highlighted the addition of an information report on East Cambs CLT referred to in Minute 82 above.

It was resolved:

That the Forward Agenda Plan be noted.

94. **EXCLUSION OF THE PUBLIC INCLUDING REPRESENTATIVES OF THE PRESS**

It was resolved:

That the press and public be excluded during the consideration of the remaining items because it is likely, in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the public were present during the item there would be disclosure to them of exempt information of Categories 1 & 3 of Part I Schedule 12A to the Local Government Act 1972 (as amended).

95. **ECTC MANAGEMENT ACCOUNTS**

The Committee received an exempt report containing a summary view of the ECTC management accounts for the period to October 2020.

It was resolved:

That the contents of the report be noted.

96. **ASSET MANAGEMENT MATTER, ELY**

The Committee considered an exempt report concerning an asset of the Council in Ely.

It was resolved:

That the recommendations in the submitted report be approved.

97. **EXEMPT MINUTES**

It was resolved:

That the Exempt Minutes of the meeting of the Committee held on 24<sup>th</sup> September 2020 be confirmed as a correct record and be signed by the Chairman.

The meeting closed at 19.31pm.

Agenda Item 6

# East Cambridgeshire District Council

Annual Audit Letter for the year  
ended 31 March 2020

January 2021

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Public Sector Audit Appointments Ltd (PSAA) have issued a 'Statement of responsibilities of auditors and audited bodies'. It is available from the Chief Executive of each audited body and via the PSAA website ([www.psaa.co.uk](http://www.psaa.co.uk)). [OR As part the Auditor Engagement process, we have agreed with you the respective responsibilities of auditors and audited bodies. Copies of the Engagement Letter and Terms and Conditions of our appointment are available from the Chief Executive or via the bodies minutes on their website].

This Statement of responsibilities serves as the formal terms of engagement between appointed auditors and audited bodies. It summarises where the different responsibilities of auditors and audited bodies begin and end, and what is to be expected of the audited body in certain areas.

The 'Terms of Appointment (updated April 2018)' issued by PSAA [OR The Terms and Conditions of our appointment contained within the Engagement Letter] sets out additional requirements that auditors must comply with, over and above those set out in the National Audit Office Code of Audit Practice (the Code) and statute, and covers matters of practice and procedure which are of a recurring nature.

This Annual Audit Letter is prepared in the context of the Statement of responsibilities. It is addressed to the Members of the audited body, and is prepared for their sole use. We, as appointed auditor, take no responsibility to any third party.

Our Complaints Procedure - If at any time you would like to discuss with us how our service to you could be improved, or if you are dissatisfied with the service you are receiving, you may take the issue up with your usual partner or director contact. If you prefer an alternative route, please contact Hywel Ball, our Managing Partner, 1 More London Place, London SE1 2AF. We undertake to look into any complaint carefully and promptly and to do all we can to explain the position to you. Should you remain dissatisfied with any aspect of our service, you may of course take matters up with our professional institute. We can provide further information on how you may contact our professional institute.





Section 1

# Executive Summary

# Executive Summary

We are required to issue an annual audit letter to East Cambridgeshire District Council (the Council) following completion of our audit procedures for the year ended 31 March 2020. Below are the results and conclusions on the significant areas of the audit process.

Area of Work	Conclusion
<b>Opinion on the Council's:</b>	
▶ Financial statements	On 27 November 2020 we issued an unqualified opinion. The financial statements give a true and fair view of the financial position of the Council as at 31 March 2020 and of its expenditure and income for the year then ended.  We did include a paragraph emphasising the material uncertainty in relation to the valuation of the Council's property assets as a result of Covid-19. This was not a qualification or modification to the audit opinion.
▶ Consistency of other information published with the financial statements	Other information published with the financial statements was consistent with the Annual Accounts
▶ Concluding on the Council's arrangements for securing economy, efficiency and effectiveness	We concluded that you have put in place proper arrangements to secure value for money in your use of resources

Area of Work	Conclusion
<b>Reports by exception:</b>	
▶ Consistency of Governance Statement	The Governance Statement was consistent with our understanding of the Council.
▶ Public interest report	We had no matters to report in the public interest.
▶ Written recommendations to the Council, which should be copied to the Secretary of State	We had no matters to report.
▶ Other actions taken in relation to our responsibilities under the Local Audit and Accountability Act 2014	We had no matters to report.

Area of Work	Conclusion
<b>Reporting to the National Audit Office (NAO) on our review of the Council's Whole of Government Accounts return (WGA).</b>	We have submitted the WGA assurance statement to the NAO with no matters to report.

# Executive Summary (cont'd)

As a result of the above we have also:

Area of Work	Conclusion
Issued a report to those charged with governance of the Council communicating significant findings resulting from our audit.	We issued our final Audit Results Report to the 26 November 2020 Finance and Assets Committee meeting.
Issued a certificate that we have completed the audit in accordance with the requirements of the Local Audit and Accountability Act 2014 and the National Audit Office's 2015 Code of Audit Practice.	We have issued the certificate with no matters to report.

## Fees

In the Final Audit Results Report we indicated that we had carried out additional work as a result of the risks we identified at planning as well as the subsequent impact of Covid-19 that necessitated an additional audit fee. We have quantified the proposed final fee and have provided the Finance Manager with appropriate supporting details.

We would like to take this opportunity to thank the Council staff for their assistance during the course of our work and in particular given the challenging priorities they faced as a result of their work in responding to the Covid-19 pandemic and their collaborative approach which enabled us to complete the 2019/20 audit by working remotely.



Suresh Patel

Associate Partner

For and on behalf of Ernst & Young LLP

Section 2

# Purpose and Responsibilities



# Purpose

## The Purpose of this Letter

The purpose of this annual audit letter is to communicate to Members and external stakeholders, including members of the public, the key issues arising from our work, which we consider should be brought to the attention of the Council. We have already reported the detailed findings from our audit work in our 2019/20 Initial and Final Audit Results Report to Finance and Assets Committee, representing those charged with governance. We do not repeat those detailed findings in this letter. The matters reported here are the most significant for the Council.

## Responsibilities of the Appointed Auditor

Our 2019/20 audit work has been undertaken in accordance with the Audit Plan that we issued on 12 March 2020 and is conducted in accordance with the National Audit Office's 2015 Code of Audit Practice, International Standards on Auditing (UK), and other guidance issued by the National Audit Office.

As auditors we are responsible for:

- ▶ Expressing an opinion:
  - ▶ On the 2019/20 financial statements of the Council; and
  - ▶ On the consistency of other information published with the financial statements
- ▶ Forming a conclusion on the arrangements the Council has to secure economy, efficiency and effectiveness in its use of resources.
- ▶ Reporting by exception:
  - ▶ If the annual governance statement (AGS) is misleading or not consistent with our understanding of the Council;
  - ▶ Any significant matters that are in the public interest;
  - ▶ Any written recommendations to the Council, which should be copied to the Secretary of State; and
  - ▶ If we have discharged our duties and responsibilities as established by the Local Audit and Accountability Act 2014 and Code of Audit Practice.

Alongside our work on the financial statements, we also review and report to the National Audit Office (NAO) on your Whole of Government Accounts return. The extent of our review and the nature of our report are specified by the NAO.

## Responsibilities of the Council

The Council is responsible for preparing and publishing its statement of accounts accompanied by an AGS. In the AGS, the Council reports publicly each year on how far it complies with its own code of governance, including how it has monitored and evaluated the effectiveness of its governance arrangements in year, and any changes planned in the coming period.

The Council is also responsible for putting in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

Section 3

# Financial Statement Audit



# Financial Statement Audit

## Key Issues

The Council's Statement of Accounts is an important tool for the Council to show how it has used public money and how it can demonstrate its financial management and financial health.

We audited the Council's Statement of Accounts in line with the National Audit Office's 2015 Code of Audit Practice, International Standards on Auditing (UK), and other guidance issued by the National Audit Office and issued an unqualified audit report on 27 November 2020.

Our detailed findings were reported to the 26 November 2020 Finance and Assets Committee. The key issues identified as part of our audit were as follows.

Significant risks	Conclusion
<b>Misstatements due to fraud or error</b>	We did not identify any matters to report to the Finance and Assets Committee.
<b>Incorrect capitalisation of revenue expenditure</b>	We did not identify any matters to report to the Finance and Assets Committee.
<b>Valuation of Property, Plant and Equipment (assets)</b>	<p>We identified a need for the Council to make a £0.160 million adjustment in relation to the valuation of its Leisure Centre.</p> <p>The Council has appropriately disclosed a material valuation uncertainty paragraph included by its valuer in their valuation report.</p> <p>We included an emphasis of matter paragraph to draw users attention to the disclosure around valuation uncertainty.</p>
<b>Pension liability</b>	Our work identified that the pension liability was understated by £0.086 million. This relates to differences in asset valuation from the draft information, and the impact of one national issue (McCloud). The Council have also determined that another issue (Goodwin) was not material in 2019/20.

## Other audit risks on the Council audit

**Group boundary assessment** - the Council has appropriately considered its interest in other organisations and produced consolidated group accounts in line with this.

**Going concern** - the Council has assessed the impact of Covid-19 on its income, expenditure, cash and reserves position into 2020/21 and 2021/22 and made an appropriate disclosure in the statements.

# Financial Statement Audit (cont'd)

## Our application of materiality

When establishing our overall audit strategy, we determined a magnitude of uncorrected misstatements that we judged would be material for the financial statements as a whole.

Item	Thresholds applied
Planning materiality	We determined planning materiality to be 2% of Gross Expenditure on provision of services and performance materiality at 50% of planning materiality.
Reporting threshold	We agreed with the Finance and Assets Committee that we would report to the Committee all audit differences in excess of 5%.

Materiality	
Planning	£0.790m
Performance	£0.395m
Reporting	£0.039m



Section 4

# Value for Money



# Value for Money

We are required to consider whether the Council has put in place 'proper arrangements' to secure economy, efficiency and effectiveness in its use of resources. This is known as our value for money conclusion.

Proper arrangements are defined by statutory guidance issued by the National Audit Office. They comprise your arrangements to:

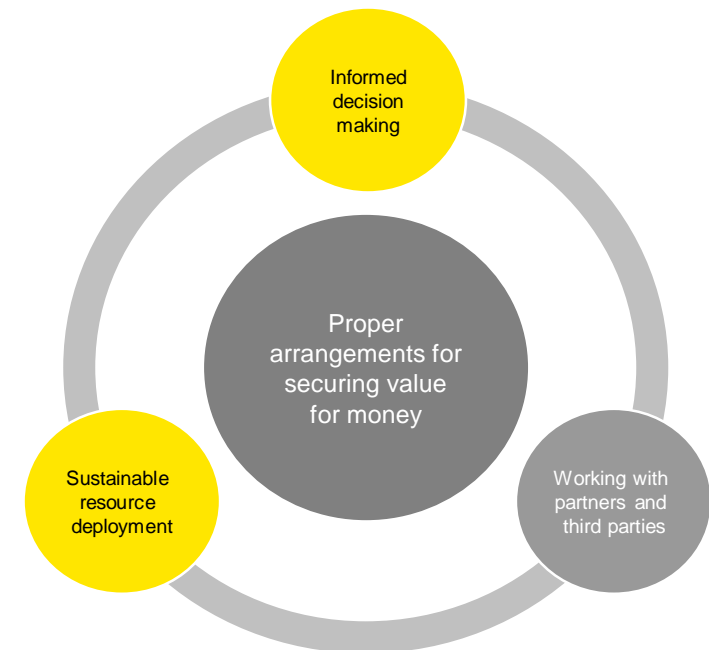
- ▶ Take informed decisions;
- ▶ Deploy resources in a sustainable manner; and
- ▶ Work with partners and other third parties.

On 16 April 2020 the National Audit Office published an update to auditor guidance in relation to the 2019/20 Value for Money assessment in the light of Covid-19. This clarified that in undertaking the 2019/20 Value for Money assessment auditors should consider LG bodies' response to Covid-19 only as far as it relates to the 2019-20 financial year; only where clear evidence comes to the auditor's attention of a significant failure in arrangements as a result of Covid-19 during the financial year, would it be appropriate to recognise a significant risk in relation to the 2019-20 VFM arrangements conclusion.

We did not identify a significant risk in relation to the Council's arrangements. We did however raise recommendations as part of our 2018/19 Audit Results Report.

We reported in detail as part of the Audit Results Report and do not repeat our findings here.

We performed the procedures outlined in our audit plan. We did not identify any significant weaknesses in the Council's arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people.



A photograph of a business meeting in progress. Several people are seated around a dark wooden conference table, looking at documents. A woman with blonde hair is in the foreground, resting her chin on her hand and looking intently at the papers. Other participants are visible in the background, some standing and some seated. The scene is brightly lit, suggesting a modern office environment.

Section 5

# Other Reporting Issues

# Other Reporting Issues

## **Whole of Government Accounts**

We are required to perform the procedures specified by the National Audit Office on the accuracy of the consolidation pack prepared by the Council for Whole of Government Accounts purposes. We completed this work and reported to the National Audit Office. We had no matters to report.

## **Annual Governance Statement**

We are required to consider the completeness of disclosures in the Council's annual governance statement, identify any inconsistencies with the other information of which we are aware from our work, and consider whether it is misleading. We had no matters to report.

## **Report in the Public Interest**

We have a duty under the Local Audit and Accountability Act 2014 to consider whether, in the public interest, to report on any matter that comes to our attention in the course of the audit in order for it to be considered by the Council or brought to the attention of the public.

We did not identify any issues which required us to issue a report in the public interest.

## **Written Recommendations**

We have a duty under the Local Audit and Accountability Act 2014 to designate any audit recommendation as one that requires the Council to consider it at a public meeting and to decide what action to take in response.

We did not identify any issues which required us to issue a written recommendation.

## **Objections Received**

We did not receive any objections to the 2019/20 financial statements from members of the public.

## **Other Powers and Duties**

We identified no issues during our audit that required us to use our additional powers under the Local Audit and Accountability Act 2014.

## **Independence**

We communicated our assessment of independence in our Audit Results Report to the Finance and Assets Committee on 26 November 2020. In our professional judgement the firm is independent and the objectivity of the audit engagement partner and audit staff has not been compromised within the meaning regulatory and professional requirements.

## **Control Themes and Observations**

As part of our work, we obtained an understanding of internal control sufficient to plan our audit and determine the nature, timing and extent of testing performed. Although our audit was not designed to express an opinion on the effectiveness of internal control, we are required to communicate to you significant deficiencies in internal control identified during our audit.

We have adopted a fully substantive audit approach and have therefore not tested the operation of controls.

Section 6

# Focused on your future



# Focused on your future

The NAO has a new Code of Audit Practice for 2020/21. The impact on the Council is summarised in the table below.

## Council responsibilities for value for money

The Council is required to maintain an effective system of internal control that supports the achievement of its policies, aims and objectives while safeguarding and securing value for money from the public funds and other resources at its disposal.

As part of the material published with the financial statements, the Council is required to bring together commentary on the governance framework and how this has operated during the period in a governance statement. In preparing the governance statement, the Council tailors the content to reflect its own individual circumstances, consistent with the requirements of the relevant accounting and reporting framework and having regard to any guidance issued in support of that framework. This includes a requirement to provide commentary on arrangements for securing value for money from the use of resources.

## Auditor responsibilities under the new Code

Under the 2020 Code we are still required to consider whether the Council has put in place 'proper arrangements' to secure economy, efficiency and effectiveness on its use of resources. However, there is no longer overall evaluation criterion which we need to conclude on. Instead the 2020 Code requires the auditor to design their work to provide them with sufficient assurance to enable them to report to the Council a commentary against specified reporting criteria (see below) on the arrangements the Council has in place to secure value for money through economic, efficient and effective use of its resources for the relevant period.

The specified reporting criteria are:

- Financial sustainability - How the Council plans and manages its resources to ensure it can continue to deliver its services.
- Governance - How the Council ensures that it makes informed decisions and properly manages its risks.
- Improving economy, efficiency and effectiveness - How the Council uses information about its costs and performance to improve the way it manages and delivers its services.

Continued

# Focused on your future

## Reporting on VFM

In addition to the commentary on arrangements, where we are not satisfied that the Council has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources the 2020 Code has the same requirement as the 2015 Code in that we should refer to this by exception in the audit report on the financial statements.

However, a new requirement under the 2020 Code is for us to include the commentary on arrangements in a new Auditor's Annual Report. The 2020 Code states that the commentary should be clear, readily understandable and highlight any issues we wish to draw to the Council's attention or the wider public. This should include details of any recommendations arising from the audit and follow-up of recommendations issued previously, along with our view as to whether they have been implemented satisfactorily.

The Code of Practice on Local Authority Accounting in the United Kingdom introduces the application of new accounting standards in future years. The impact on the Council is summarised in the table below.

Standard	Issue	Impact
<b>IFRS 16 Leases</b>	<p>It is currently proposed that IFRS 16 will be applicable for local authority accounts from the 2021/22 financial year.</p> <p>Whilst the definition of a lease remains similar to the current leasing standard; IAS 17, for local authorities who lease a large number of assets the new standard will have a significant impact, with nearly all current leases being included on the balance sheet.</p> <p>There are transitional arrangements within the standard and although the 2020/21 Accounting Code of Practice for Local Authorities has yet to be updated, CIPFA have issued some limited provisional information which begins to clarify what the impact on local authority accounting will be. Whether any accounting statutory overrides will be introduced to mitigate any impact remains an outstanding issue.</p>	<p>Until the revised 2020/21 Accounting Code is issued and any statutory overrides are confirmed there remains some uncertainty in this area.</p> <p>However, what is clear is that the Council will need to undertake a detailed exercise to identify all of its leases and capture the relevant information for them. The Council must therefore ensure that all lease arrangements are fully documented.</p>

A hand is holding a bright yellow rectangular box over a row of file folders. The folders are arranged in a row on a shelf, with several of them containing stacks of papers. The folders have colorful tabs in shades of blue, white, and yellow. The background is a light-colored wall with a subtle pattern.

Section 8

# Audit Fees



# Audit Fees

## Fees

Following communications to the Finance and Assets Committee on the changes and challenges impacting the audit profession, in June 2020 we communicated to the Finance Manager our view of the inadequacy of the current scale fee to enable us to deliver a quality audit in accordance with the NAO Code. In our view the scale fee should be increased by £18,209 and we provided details supporting our rationale. At the same time we opened dialogue with PSAA on our view of scale fees nationally and shared with them proposed revisions for all our local government audited bodies. We include our proposed increase to the scale fee in the table below. We remain in dialogue with PSAA over the scale fees.

In addition, in the Audit Results Report we indicated that we had carried out additional work as a result of risks identified at planning as well as due to the impact of Covid-19 that necessitated an additional audit fee. We have now quantified the proposed fee. We have provided the Finance Manager with supporting details and are currently in discussion, seeking to reach agreement. We will then seek approval from PSAA.

	Final fee 2019/20 (£)	Planned fee 2019/20 (£)	Final Fee 2018/19 (£)
Scale Fee - Code work	31,955	31,955	31,955
Additional work:			
• Group consolidation	5,900	4,000-6,000	6,425
• 50% Performance materiality	6,253	4,000-7,000	6,666
• Correspondence from the public	-	-	2,005
• Value for money conclusion - addressing prior year recommendations	834	-	-
• Property, Plant and Equipment Considerations (Valuation Uncertainty)	3,102	-	-
• Going Concern	2,370	-	-
• Internal consultations due to additional disclosure requirements	2,603	-	-
• Pensions	1,126	-	-
• Reassessment of materiality	372	-	-
• Inefficiency of remote working due to Covid-19	2,394	-	-
<b>Total current scale and additional fees</b>	<b>56,909</b>	<b>39,955-44,955</b>	<b>47,050</b>
Proposed increase to the scale fee	18,209	-	-

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**ON-STREET PARKING ENFORCEMENT AND THE COMMUNITY SAFETY ACCREDITATION SCHEME**

Committee: Finance and Assets Committee

Date: 28<sup>th</sup> January 2021

Author: Jo Brooks, Director, Operations

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1.0 **ISSUE**

1.1 To consider the implementation and exploration of initiatives to address on-street parking enforcement issues in East Cambridgeshire.

2.0 **RECOMMENDATION(S)**

2.1 Members are asked to:

- (i) Note the findings of options explored seeking to address matters relating to car parking enforcement in the District;
- (ii) Instruct Officers to engage with the Chief Constable and, if agreed by him, implement car parking enforcement under S38 of the Police and Crime Act 2017, and;
- (iii) Approve the implementation of CSAS in East Cambridgeshire and provide support to the Police as outlined at 4.6, subject to agreement by the Chief Constable, under S38 of the Police and Crime Act 2017, for ECDC to implement car parking enforcement.

3.0 **BACKGROUND**

3.1 A motion was passed at Full Council on 22<sup>nd</sup> October 2020 to instruct the Director, Operations to engage with the Cambridgeshire Constabulary Chief Constable to discuss the provision of a dedicated car parking enforcement resource for the District and/or the effective implementation of CSAS (Community Safety Accreditation Scheme). The motion requested that an update is reported to Finance and Assets Committee in January 2021 detailing any legal and financial implications for consideration and decision on how to progress the matter.

3.2 Following engagement with the Chief Constable, it was determined that a financial contribution from the Council to the Police to enhance resources aimed at providing additional car parking enforcement was not feasible at the current time.

3.3 Police Community Support Officers (PCSOs) in past times who were employed in much greater numbers would have been instrumental in tackling parking issues. It should be noted that Cambridgeshire Constabulary are in the midst of further cost cuts which will be reflected in staff redundancies. It has been publicly announced that their total PCSO numbers are being reduced from 80 to 40. In East Cambs there have been 4 PCSO posts, it is not inconceivable that by the end of the current process that East Cambs will be left with just two PCSOs for the district.

The two warranted Police Officers who also form part of the district Neighbourhood policing team are directed towards dealing with more serious criminal matters.

- 3.4 It must be noted that 94% of local and District Councils in England have decriminalised parking, using Civil Parking Enforcement, and made it their own responsibility for enforcement. This Council is committed to retaining free car parking in its city and town centre car parks; Civil Parking Enforcement has significant financial implications and has therefore been ruled out as an option by this Council.
- 3.5 The Community Safety Accreditation Scheme (CSAS) is a scheme administered by the Police that provides the opportunity for the Constabulary Chief Constable to bestow some Police powers (issuing parking tickets is not one of these powers) on accredited employees of partner organisations who are working in partnership with the police. It provides the opportunity for an enhanced working relationship between both sides. Organisations decide and manage their employees' priorities and workloads. CSAS accredited employees are not intended to be 'police officers'.
- 3.6 In other areas the scheme has effectively enhanced working relationships between the police and other organisations and has proved effective in addressing a range of issues.

#### 4.0 ARGUMENTS/OPTIONS

- 4.1 CSAS could be used to improve car parking enforcement. However, CSAS on its own does not allow non-Police staff to actually issue car parking tickets, and limits the power of non-Police staff to the collection of evidence which is passed over to the Police. CSAS could be used to enhance efforts in tackling parking enforcement issues, which could be achieved using the Police's 'Four E's' approach - Engage, Explain, Encourage and Enforce. This approach complements the Council's commitment to providing free parking while encouraging restrictions to be followed.
- 4.2 The list below outlines how CSAS provides an opportunity to address a variety of matters impacting local communities:
- Intelligence, data and information can be readily shared between accredited organisations due to the enhanced security vetting of accredited staff working with existing information sharing agreements.
  - A credible, accredited person is relaying information and intelligence back to the police and other organisations
  - Accredited police forces have access to the services of the National Problem Solving Group that is made up of hundreds of police officers representing 43 forces available to respond to specific questions, the obvious benefit of not having to 're-invent the wheel'.
  - CSAS aligns with existing local initiatives such as East Cambs Community Safety Partnership Eyes and Ears project which has the catch phrase of 'it's everybody's business'
  - Staff safety may be improved as it is an offence to obstruct or attack an accredited officer and the police crest will be present on ID badges which could reduce the risk of confrontation
  - A CSAS accreditation adds value to the personal CVs of individuals who participate
  - Accredited individuals are trained in a number of areas including human rights, diversity, confrontation, communication, prevent (terrorism), ASB and crime Acts, this is benefit to the existing employer

- Often there are multiple organisations addressing common issues, therefore CSAS enables accredited organisations to work together to address matters by sharing resources and developing multi-agency solutions. In East Cambs, this is currently carried out via the Community Safety Partnership's (CSP's) Problem Solving Group. CSAS is expected to enhance existing work practice and information sharing.
  - In other areas, CSAS has seen successes when dealing with individuals as some accredited roles may be seen as less obtrusive as a police officer. This is because CSAS staff are not in police uniform and not overtly in an authoritative position where some people will not engage. This is more likely to build trust and credibility between CSAS staff and the individual being engaged with.
  - Local problem solving is enhanced due to multiple agencies working collaboratively to address shared issues; successes in Essex include tackling street drinking, robbery and begging through the establishment of preventative measures such as the implementation of Public Space Protection Orders, campaigns, joint patrols, issuing of on-the-spot magistrates orders and Fixed Penalty Notices and the erection of signage
  - The CSAS logo can be used on promotional materials and letter headed paper
  - The scheme could enhance respect and credibility of accredited people carrying out enforcement roles
  - There may be future opportunities for the creation of partnership hubs and desk sharing
  - Quarterly CSAS regional meetings take place that the police can attend to discuss matters relating to the scheme.
- 4.3 As well as car parking issues, other prevalent local issues impacting East Cambs communities include youth nuisance, low level criminality, noise, truancy and anti-social driving, and more recently matters relating to the COVID-19 pandemic and Government restrictions. The Constabulary neighbourhood team form a small part of a much larger multi-agency neighbourhood team. It is therefore envisaged that CSAS could be an effective initiative to enhance the way that organisations work together in partnership to address common goals.
- 4.4 The Police and Crime Act 2017, (Section 38), permits Cambridgeshire Constabulary to bestow powers to volunteers acting on their behalf, including the power to directly issue car parking enforcement Fixed Penalty Notices (FPNs). Volunteers can include Council employed staff. Volunteers could consist of vetted, trained and CSAS accredited staff operating within the district to act on behalf of the police and who would be able to directly issue FPNs. Administration and processing of any FPN will be a Constabulary responsibility after receiving the paperwork from the issuing officer. To provide consistency with the CSAS approach, volunteers could also use the police's 4 E's approach to enforcement (as outlined at 4.2). Implementing this initiative makes use of existing resources while adding value to the benefits of the implementation of CSAS, as volunteers would have access to official police stationary and administrative resources. This opportunity has negligible cost implications for ECDC other than staff time.
- 4.5 Whilst CSAS is a recognised scheme currently in use around the country, specifically using CSAS to address parking issues was not its primary intended purpose. Section 38 of the Police and Crime Act 2017 is not currently used by Cambridgeshire Constabulary, but discussion with the Constabulary has been positive and the recommendation is therefore to pursue the implementation of CSAS subject to

agreement with the Chief Constable for the bestowal of S38 powers to the Council to enable it to simultaneously implement car parking enforcement.

## 5.0 CONCLUSIONS

5.1 The implementation of CSAS in conjunction with bestowed police powers under Section 38 of the Police and Crime Act 2017 could provide an effective approach of tackling issues relating to car parking enforcement and other matters affecting local communities.

5.2 Members are requested to instruct officers to engage with the Chief Constable requesting that he bestow powers under Section 38 of the Police and Crime Act 2017 to implement car parking enforcement, approve the implementation of CSAS in East Cambridgeshire and provide support to the Police as outlined at 4.6, subject to agreement by the Chief Constable, under S38 of the Police and Crime Act 2017, for EDCDC to implement car parking enforcement.

## 6.0 FINANCIAL IMPLICATIONS/EQUALITY IMPACT ASSESSMENT

6.1 Training of each CSAS accredited person costs approximately £100. Additional costs include the production of CSAS ID cards and patches displaying the CSAS logo. Additional clothing displaying the CSAS uniform may be considered at a later date.

6.2 If bestowed powers under Section 38 of the Police and Crime Act 2017 were implemented then official uniform would be required to be purchased and administrative costs would be incurred.

## 7.0 APPENDICES

7.1 Appendix 1 – EIA

7.3 Appendix 2 – CIA

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### Background Documents

### Location

Room , The  
Grange

### Contact Officer

Jo Brooks  
Director, Operations  
(01353) 665555  
E-mail: Jo.Brooks@eastcambs.gov.uk

**EQUALITY IMPACT ASSESSMENT (EIA) FORM**

**Appendix 1**

<b>Name of Policy:</b>	On-Street Parking Enforcement
<b>Lead Officer (responsible for assessment):</b>	Jo Brooks, Director, Operations
<b>Department:</b>	Operations
<b>Others Involved in the Assessment (i.e. peer review, external challenge):</b>	
<b>Date EIA Completed:</b>	11.01.2021

**What is an Equality Impact Assessment (EIA)?**

As part of any effective policy development process, it is important to consider any potential risks to those who will be affected by the policy's aims or by its implementation. The Equality Impact Assessment (EIA) process helps us to assess the implications of our decisions on the whole community, to eliminate discrimination, tackle inequality, develop a better understanding of the community we serve, target resources efficiently, and adhere to the transparency and accountability element of the Public Sector Equality Duty.

**The word 'policy', in this context, includes the different things that the Council does. It includes any policy, procedure or practice - both in employment and service delivery. It also includes proposals for restructuring, redundancies and changes to service provision.**

- (a) **What is the policy trying to achieve?** i.e. What is the aim/purpose of the policy? Is it affected by external drivers for change? What outcomes do we want to achieve from the policy? How will the policy be put into practice?

This report considers the implementation and exploration of initiatives to address on-street parking enforcement issues in East Cambridgeshire.

- (b) **Who are its main beneficiaries?** i.e. who will be affected by the policy?

Residents, visitors, motorists and communities and organisations affected by on-street parking issues.

- (c) **Is the EIA informed by any information or background data (quantitative or qualitative)?** i.e. consultations, complaints, applications received, allocations/take-up, satisfaction rates, performance indicators, access audits, census data, benchmarking, workforce profile etc.

At Full Council on 22<sup>nd</sup> October 2020, a Motion was carried unanimously which instructed the Director, Operations to engage with the Chief Constable to discuss the provision of a dedicated car parking enforcement resource for the District and/or the effective implementation of CSAS (Community Safety Accreditation Scheme).

- (d) **Does this policy have the potential to cause a positive or negative impact on different groups in the community, on the grounds of any of the protected characteristics?** (please tick all that apply)

<b>Ethnicity</b>	<input checked="" type="checkbox"/>	<b>Age</b>	<input checked="" type="checkbox"/>
<b>Gender</b>	<input checked="" type="checkbox"/>	<b>Religion and Belief</b>	<input checked="" type="checkbox"/>
<b>Disability</b>	<input checked="" type="checkbox"/>	<b>Sexual Orientation</b>	<input checked="" type="checkbox"/>
<b>Gender Reassignment</b>	<input checked="" type="checkbox"/>	<b>Marriage &amp; Civil Partnership</b>	<input checked="" type="checkbox"/>

Pregnancy & Maternity

Caring Responsibilities

**Please explain any impact identified:** i.e. What do you already know about equality impact or need? Is there any evidence that there is a higher or lower take-up by particular groups? Have there been any demographic changes or trends locally? Are there any barriers to accessing the policy or service?

Parking issues could impact all residents and visitors.

- |   |                  |
|---|------------------|
| <b>(e) Does the policy have a differential impact on different groups?</b>  | <b>YES/NO/Na</b> |
| <b>(f) Is the impact <i>adverse</i> (i.e. less favourable)?</b>   | <b>YES/NO/Na</b> |
| <b>(g) Does it have the potential to disadvantage or discriminate unfairly against any of the groups in a way that is unlawful?</b> | <b>YES/NO/Na</b> |

**(h) How have you engaged stakeholders in gathering evidence or testing the policy proposals?** Who was involved, how and when where they engaged? Does the evidence show potential for differential impact? How will you mitigate any negative impacts? Where there is the potential for an adverse impact that cannot be addressed immediately, these should be highlighted in your recommendations and objectives at the end of the EIA.

Cambridgeshire Constabulary has been consulted during the exploration of options and they have informed the report and its recommendations.

\* The Consultation Register is available to assist staff in consulting with the Council's stakeholders.

**(i) Summarise the findings of your research and/or consultation (please use a separate sheet if necessary).**

Details of the options available to the Council are outlined at 3.2 and 4.0.

**(j) What are the risks associated with the policy in relation to differential impact and unmet needs/requirements?** i.e. reputation, financial, breach of legislation, service exclusion, lack of resources, lack of cooperation, insufficient budget etc.

There are no foreseen risks associated with the recommendations. CSAS has been effectively implemented and embedded in other areas of the country and the police will work with other constabularies to embed a similar approach in East Cambridgeshire.

**(k) Use the information gathered in the earlier stages of your EIA to make a judgement on whether there is the potential for the policy to result in unlawful discrimination or a less favourable impact on any group in the community, and what changes (if any) need to be made to the policy.**

Option 1:	No major change - the evidence shows that the policy is robust and no potential for discrimination.	x
Option 2:	Adjust the policy - to remove barriers or to better promote equality.	
Option 3:	Continue the policy - despite potential for adverse impact or missed opportunity to promote equality, provided you have satisfied yourself that it does not unlawfully discriminate.	
Option 4:	Stop and remove the policy – if the policy shows adverse effects that cannot be justified.	



- (I) Where you have identified the potential for adverse impact, what action can be taken to remove or mitigate against the potential for the policy to unlawfully discriminate or impact less favourably on one or more communities in a way that cannot be justified?** Include key activities that are likely to have the greatest impact (max. 6). Identified actions should be specified in detail for the first year but there may be further longer term actions which need to be considered. To ensure that your actions are more than just a list of good intentions, include for each: the person responsible for its completion, a timescale for completion, any cost implications and how these will be addressed. It is essential that you incorporate these actions into your service plans.

N/A

This completed EIA will need to be countersigned by your Head of Service. **Please forward completed and signed forms to the Principal HR Officer.**

All completed EIAs will need to be scrutinised and verified by the Council's Equal Opportunities Working Group (EOWG) and published on the Council's Intranet to demonstrate to local people that the Council is actively engaged in tackling potential discrimination and improving its practices in relation to equalities. Please be aware that you may be asked to attend a half-an-hour session to summarise the findings of the EIA to the Scrutiny and Verification panel.

**Signatures:**

**Completing Officer:** Jo Brooks **Date:** 11.01.2021

**Head of Service:** \_\_\_\_\_ **Date:** \_\_\_\_\_

## V1 (Cfte Reports Jan 2020 onwards)

**ECDC Carbon Impact Assessment:**

Once complete, this CIA should be sent to Richard Kay ([richard.kay@eastcambs.gov.uk](mailto:richard.kay@eastcambs.gov.uk)) for review prior to including a summary of this CIA within your committee report.

Please provide a brief description of the policy/decision including the proposed outcomes?

To consider the implementation and exploration of initiatives to address on-street parking enforcement issues in East Cambridgeshire.

Members are recommended to:

- (i) Note the findings of options explored seeking to address matters relating to car parking enforcement
- (ii) Instruct Officers to engage with the Chief Constable and, if agreed by him, implement car parking enforcement under S38 of the Police and Crime Act 2017.
- (iii) Approve the implementation of CSAS in East Cambridgeshire and provide support to the Police as outlined at 4.6, subject to agreement by the Chief Constable, under S38 of the Police and Crime Act 2017, for ECDC to implement car parking enforcement.

Now consider whether any of the following aspects will be affected. Many are likely to be ticked 'neutral':

Aspect	Likely climate effect:			Commentary
	+ve	-ve	neutral	
The council's energy consumption via buildings (electricity, gas, oil). Tick +ve if consumption will reduce.			√	
The council's energy consumption via travel (eg petrol). Tick +ve if consumption will reduce.			√	
The councils water usage (especially hot water). Tick +ve if consumption will reduce.			√	
Creation of renewable energy. Tick +ve if it increases renewable energy production. Tick -ve if renewable energy is lost.			√	
Carbon offsetting – will the proposal offset carbon emissions such as through tree planting. Tick +ve if yes.			√	

<p>Reducing carbon emissions through amending ongoing activities not covered above eg management of land, such as peat soils, in a way which reduces carbon dioxide emissions. Tick +ve if yes.</p>			√	
<p>If the project involves the creation or acquisition of a building, has the energy rating been considered? Are / will measures be included to make the building energy efficient, beyond basic building regulation or other legal requirements? Tick +ve if yes.</p>			√	
<p>Embodied energy - does your project/proposal include construction of buildings or other significant infrastructure? If no, then tick neutral. If yes, have genuine efforts been made to minimise the <i>embodied energy</i>* in the materials being used for that construction, and the source of such materials? If so, tick +ve.</p>			√	

**What information is available to help the carbon impacts identified above to be quantified?**

(e.g. this might be a estimation of energy consumption provided by a constructor, an estimate of distance travelled to a new site etc.)

**Can any negative outcomes be justified as appropriate or necessary?**

N/A

**Are any remedial or mitigation actions required?**

No

**Once implemented, will you monitor the actual impact of any +ve or -ve outcomes? Yes / No. If so, how?**

N/A

**Overall summary to be included in your covering report (i.e. what you put in this box should be replicated in your committee report, and therefore should provide the overall summary of the carbon impact, in language suitable for being placed in the public domain).**

There are no positive or negative carbon impact implications arising.

<b>Assessment completed by (name and position)</b>	Jo Brooks Director, Operations
<b>Date CIA completed</b>	11.01.2021
<b>Approved by Richard Kay</b>	

\*Embodied energy is the energy used (and therefore carbon dioxide or other greenhouse gases emitted) during the manufacture, transport and construction of building materials. So for example, if you are specifying concrete on a project then carbon dioxide (or equivalent) will have been emitted making that concrete. Different materials have high and low levels of embodied energy, with low being good. Not only can different materials have different embodied energy values, but the same material can also have differing embodied energy values depending on where it was sourced and transported. For example, stone sourced from China would have a far greater embodied energy within it than the same stone sourced locally, due to the carbon dioxide emitted during transportation. By way of examples, using stainless steel will likely have over 10 times more embodied energy within it, per kg, than timber.

**CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT (SPD)**

Committee: Finance and Assets

Date: 25 January 2021

Author: Richard Kay – Strategic Planning Manager

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1.0 **ISSUE**

1.1 For Committee to determine whether to adopt the Climate Change Supplementary Planning Document (SPD). If so, this SPD will then become a material consideration in making planning decisions. A copy of the SPD, proposed for adoption, can be found at Appendix 2.

2.0 **RECOMMENDATION(S)**

2.1 That Committee:

- (A) Adopts, as a formal Supplementary Planning Document (SPD), the Climate Change SPD and brings it into effect as soon as possible (but not before any decision call-in period has expired).

3.0 **BACKGROUND**

**Introduction**

3.1 This is a new SPD, which aims to help the planning system achieve development which has a lower impact on the climate.

3.2 Preparation of this SPD was committed to in the Council's (June 2020) Environment Plan (available at <https://www.eastcambs.gov.uk/content/climate-change-0>).

**Context and Background**

3.3 Sections 1-2 of the SPD set the context for the SPD, and highlights the global issues in respect of climate change, and the need for local areas, such as East Cambridgeshire, to 'do their bit' to help mitigate the impacts of climate change. The Environment Plan also provides more detailed information by way of context.

**Policy Review**

3.4 Section 3 of the draft SPD provides a summary of the relevant planning legislation and national policy, as well as a review of existing Council planning policy (in its Local Plan and other SPDs).

- 3.5 What that review highlights is that the Council already has a good framework in place to seek development which has a lower impact on the environment and the climate, but that there is scope, via this SPD, to provide further guidance and encouragement on the issue.
- 3.6 However, and as explained within the SPD, there are limitations on what an SPD can do. Thus, this SPD cannot seek to *require* developers to do more than what the Local Plan asks, but rather help to reinforce what the Local Plan says, help to deliver what the Local Plan is seeking, and *encourage* (rather than require) developers to go further.

### Climate Change SPD content

3.7 The relatively short SPD has four new Policies:

- **CC1 Reducing carbon dioxide emissions:** This policy encourages developers to submit a Sustainability Statement (or similar), and provides guidance on what that could cover. At present, developers tend to avoid submitting such information (despite the provision of the Local Plan) and often the Council has to condition any planning consent with the need for such a Statement to be subsequently submitted and approved by the Council. Ideally, we should look to turn this around so that the development proposals themselves are informed by sustainability measures in the first instance, rather than an after-thought, post permission. This new policy should help this, though it still sets out the option, at the Council's discretion, for conditions to be added to consents, if such Statements were not forthcoming at the application stage.
- **CC2: Reducing energy demand in existing buildings:** This policy targets specific applications involving changes of use and extensions, and seeks the developer to look beyond just the change of use or extension, and see whether opportunities exist for wider energy efficiency improvements to the building as a whole. As this is an SPD, it cannot require a developer to do this, but the policy encourages it, and proposals will be considered positively if a developer does so.
- **CC3: Resilient and adaptable design:** There is a general acceptance that as well as climate change mitigation, we need to accept climate change is happening and that we need to ensure development is able to adapt to a changing climate. This policy aims to do that by encouraging development to be more resilient to increasing temperatures, and more adaptable to future change.
- **CC4: Safeguarding renewable and low carbon energy sources:** This SPD does not set policies on new renewable energy proposals (as they are suitably covered in other SPDs). However, there is a gap in such existing policies in respect of safeguarding such renewable energy infrastructure, where they already exist. This policy proposes to fill that gap.

## Consultation and Responses

- 3.8 Prior to the adoption of this SPD, the Council is legally required to undertake appropriate consultation for a minimum of four weeks. Officers have ensured at least minimum legal requirements in this regard are met: in the case of this SPD, a 6 week consultation took place between 13 October and 23 November 2020.
- 3.9 All comments received during the consultation have been carefully considered and, where appropriate to do so, changes to the SPD are proposed. As part of the process, we have produced a Consultation Statement report which includes all comments we have received on this SPD and the Council's response to these comments (a copy is attached at Appendix 3). Should Committee agree to adopt the SPD, then this Consultation Statement report will be published on our website alongside the adopted version of the SPD.
- 3.10 Several organisations and individuals responded to the SPD consultation. All the comments received are logged in a table in the Consultation Statement report. The Council has responded to each of the comments and this is recorded in the report. Where changes are proposed to the SPD as a result of these comments, this is clearly shown in the table.
- 3.11 We received 86 comments from 13 separate organisations and individuals to the Climate Change SPD (1 late comment was also received). While most of the comments were seeking changes to the SPD, there were some support to the policies in the SPD. Some representors are seeking policies to be more prescriptive requiring stronger policies to mitigate the effects of climate change. While others, mostly from developers, wanted policies to be more flexible and not to impose extra burden on them. It was also suggested by the developers that SPD policies should not go beyond their legal remit and scope. As a consequence of this, perhaps the most significant shift from the draft to the proposed adoption SPD is to make sure the SPD is absolutely clear as to what is *encouraged* rather than *required* of developers, especially in respect of anything which is not specifically required by the provisions of the Local Plan.
- 3.12 Other more policy specific representations were received, often to aid clarity, and these are welcome and have been incorporated. More generally, officers have made other relatively minor changes, to update text and improve clarity.
- 4.0 FINANCIAL IMPLICATIONS/EQUALITY IMPACT ASSESSMENT/CARBON IMPACT ASSESSMENT
- 4.1 There are no financial implications in preparing or adopting this SPD that cannot be covered by existing budgets.
- 4.2 Equality Impact Assessment (INRA) completed – appendix 1.
- 4.3 Carbon Impact Assessment (CIA) completed. In summary, the CIA concluded as follows:

On adoption, the SPD should have a positive effect, because it seeks to deliver development which has a lower carbon impact. That positive effect will nevertheless be limited by the legal restrictions placed on SPDs, in terms of SPDs not being able to place additional burdens on developers (unless such burdens are already set out in a Local Plan or set out in national policy/legislation).

## 5.0 APPENDICES

Appendix 1 - Completed INRA

Appendix 2 –Climate Change SPD – proposed for adoption

Appendix 3 – Consultation Statement

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<b><u>Background Documents</u></b>	<b><u>Location</u></b>	<b><u>Contact Officer</u></b>
East Cambridgeshire Local Plan – 2015	Room12A The Grange	Richard Kay Strategic Planning Manager (01353) 616245
National Planning Policy Framework (NPPF) - 2019	Ely	E-mail: <a href="mailto:richard.kay@eastcambbs.gov.uk">richard.kay@eastcambbs.gov.uk</a>



## Appendix 1 - Completed INRA

### EQUALITY IMPACT ASSESSMENT – INITIAL SCREENING

Initial screening needs to take place for all new/revised Council policies. The word ‘policy’, in this context, includes the different things that the Council does. It includes any policy, procedure or practice - both in employment and service delivery. It also includes proposals for restructuring, redundancies and changes to service provision. This stage must be completed at the earliest opportunity to determine whether it is necessary to undertake an EIA for this activity.

<b>Name of Policy:</b>	Climate Change Supplementary Planning Document (SPD)
<b>Lead Officer (responsible for assessment):</b>	Richard Kay
<b>Department:</b>	Strategic Planning
<b>Others Involved in the Assessment (i.e. peer review, external challenge):</b>	None
<b>Date Initial Screening Completed:</b>	Jan 2021

- (a) **What is the policy trying to achieve?** i.e. What is the aim/purpose of the policy? Is it affected by external drivers for change? What outcomes do we want to achieve from the policy? How will the policy be put into practice?

The SPD is a supplementary document, in support of policy contained in the Local Plan and in support of national policy. It does not set new policy, but rather gives clarity on how to interpret existing policy, and sets out what information is needed by applicants in order to help them to deliver development which has a lower impact on the climate.

- (b) **Who are its main beneficiaries?** i.e. who will be affected by the policy?

It is primarily aimed at developers, and consequently the occupiers of new development. Developers will be helped by the clarity provided in the SPD as to how the policy in the Local Plan will be implemented.

- (c) **Is this assessment informed by any information or background data?** i.e. consultations, complaints, applications received, allocations/take-up, satisfaction rates, performance indicators, access audits, census data, benchmarking, workforce profile etc.

Before adoption, the draft SPD was subject to public consultation in Autumn 2020.

- (d) Does this policy have the potential to cause a positive or negative impact on different groups in the community, on the grounds of any of the protected characteristics (please tick all that apply):

**Ethnicity**  
**Gender**

No  
 No

**Age**  
**Religion or Belief**

No  
 No

**Disability**  
**Gender Reassignment**  
**Pregnancy & Maternity**

No
No
No

**Sexual Orientation**  
**Marriage & Civil Partnership**  
**Caring Responsibilities**

No
No
No

**Please explain any impact identified:** i.e. What do you already know about equality impact or need? Is there any evidence that there is a higher or lower take-up by particular groups? Have there been any demographic changes or trends locally? Are there any barriers to accessing the policy or service?

There is no apparent reason why any of the different groups as listed above will be particularly affected, negatively or positively, as a result of the SPD

- (e) Does the policy affect service users or the wider community?
- (f) Does the policy have a significant effect on how services are delivered?
- (g) Will it have a significant effect on how other organisations operate?
- (h) Does it involve a significant commitment of resources?
- (i) Does it relate to an area where there are known inequalities, e.g. disabled people's access to public transport etc?

<b>NO</b>
<b>NO</b>
<b>NO</b>
<b>NO</b>
<b>NO</b>

If you have answered **YES** to any of the questions above, then it is necessary to proceed with a full equality impact assessment (EIA). If the answer is **NO**, then this judgement and your response to the above questions will need to be countersigned by your Head of Service and then referred to the Council's Equal Opportunities Working Group (EOWG) for scrutiny and verification. Please forward completed and signed forms to the Principal HR Officer.

**Signatures:**

<b>Completing Officer:</b>	<i>RK</i>	<b>Date:</b>	<i>Jan 2021</i>
<b>Head of Service:</b>	<i>RK</i>	<b>Date:</b>	<i>Jan 2021</i>

**East Cambridgeshire District Council  
Climate Change Supplementary Planning Document**

**Finance and Assets Committee Version**

**25 January 2021**

**[this version is, subject to the views of the Committee, intended to be the adopted version of the SPD, and will come into force once any call-in period for Committee's decision has lapsed.]**

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# 1 Introduction, Purpose and Consultation Arrangements

## Introduction

- 1.1. East Cambridgeshire District Council (ECDC) declared a Climate Emergency at its Full Council meeting on 17 October 2019. ECDC has joined over 200 Councils around the UK in declaring such an emergency.
- 1.2. The Council recognises that it has a significant role to play in protecting and improving the environment for future generations. In declaring a Climate Emergency, the Council committed to producing an Environment Plan, which it subsequently did so (adopted June 2020). One action within that Plan was to prepare a Climate Change Supplementary Planning Document (SPD).

## Purpose of the Supplementary Planning Document (SPD)

- 1.3. In addition to responding to the declaration, and the subsequent Environment Plan, this SPD builds upon the 'Environment and Climate Change' section of the Local Plan (April 2015) as well as responds to National Planning Policy and guidance.
- 1.4. Paragraphs 1.9 to 1.12 below set out what an SPD is and what it can and cannot do.

## Consultation on the draft SPD

- 1.5. We consulted on a draft version of this SPD between 13 October and 23 November 2020.
- 1.6. Full details of the consultation, including the representations received, the Council's response to those representations, and details of any amendments made to the SPD as a result of those representations, can be found in the 'Climate Change Supplementary Planning Document (SPD) - Reg 12(a) Consultation Statement', available on our website. This now adopted SPD has been amended from the draft version, not only to take account of representations received, but also further amendments for the purpose of clarity and accuracy.

## Status of this document

- 1.7. On adoption, the SPD has become a material consideration for the purpose of determining planning applications, though the starting point for determining planning applications remains the East Cambridgeshire Local Plan (2015) (unless this is superseded) and, if one exists for the area in which the application falls, any Neighbourhood Plan. The SPD will be regularly reviewed, as necessary, to ensure that the content remains up to date and relevant.

## What is an SPD?

- 1.8. An SPD is a document which adds further detail to the policies in a Local Plan (*Note: a Local Plan is sometimes also referred to as a 'Development Plan Document' (DPD)*). An SPD can be used to provide further guidance for development on specific sites, or on particular issues such as, in this case, climate change. SPDs are capable of being a material consideration in planning decisions.
- 1.9. There are legal and national policy limits on what an SPD can do. For example, legislation does not permit an SPD to allocate land for anything, nor should it introduce a new 'burden' (for example, a financial burden) on development which is not already covered in a Local Plan.
- 1.10. Thus, and to take an example relevant to the topic of this Climate Change SPD, national policy places a restriction on the development of commercial scale wind turbines: such development can only be approved if it is in an area designated in a Local Plan or Neighbourhood Plan. Because an SPD is not a Local Plan or Neighbourhood Plan, this Climate Change SPD cannot designate sites for wind turbine development. In turn, therefore, most wind turbine development in East Cambridgeshire should not be approved, as a matter of principle, because no such land is designated for such purposes (there are exceptions, such as small domestic wind turbines, many of which do not need planning permission at all).

1.11 To take another example, an SPD cannot 'require' development to do something, such as a higher level of energy efficiency, if the Local Plan does not already require it. An SPD could only, at most, encourage development to go beyond Local Plan policy or go beyond national minimum requirements.

## 2 The Climate Emergency: what this means for East Cambridgeshire

- 2.1 We are facing an unprecedented climate challenge. Leading scientists from the Intergovernmental Panel on Climate Change (IPCC) have warned that if we carry on our business as usual and don't take emergency action on Climate Change, we face the gravest threats to our global environment. This includes worsening risks of drought, floods, extreme heat and poverty for hundreds of millions of people. Extreme weather events are already being seen. During a heatwave in July 2019, which saw temperatures across Europe soar, the highest temperature ever recorded in the UK was reached in nearby Cambridge (38.1 degrees Celsius).
- 2.2 The 'Special Report on Global Warming of 1.5°C' (IPCC, October 2018) describes the enormous harm that a 2°C average rise in global temperatures is likely to cause compared with a 1.5°C rise. Furthermore, it confirms that limiting global warming to 1.5°C may still be possible with ambitious action from national and sub-national authorities, civil society and the private sector.
- 2.3 East Cambridgeshire is, like most areas, a significant contributor to greenhouse gas emissions, possibly more so than average if our rich peat soils continue to dry out and release CO<sub>2</sub> into the atmosphere (a matter presently being investigated by the Combined Authority's Climate Commission). As a district, we are also more reliant on burning oil and bottled gas for heating (which is far more harmful than being on a natural gas network); and we tend to use cars more than many areas due to the rural nature of the district and the limited public transport in many parts of the district.
- 2.4 However, acting as some balance against these emissions are, for example, the large-scale solar farms in the district.
- 2.5 Local authorities have a responsibility, both in their own activities and those undertaken with partners, as well as in the influence they can bring to bear to reduce the adverse effects of their populations on the planet. Cambridgeshire and East Cambridgeshire are growing areas; increasing populations result in increasing need for businesses, houses, health, retail and leisure outlets, transport and other supporting infrastructure, all of which (with few exceptions) lead to adverse impacts on the climate. With growth comes a responsibility to balance competing demands and mitigate the negative impacts of that growth as far as is reasonably possible.

## 3 Policy Review

### Legislation

- 3.1 The Climate Change Act 2008 set a legally binding target to reduce the UK's greenhouse gas emissions by at least 80% in 2050 from 1990 levels. In 2019 this was amended (by The Climate Change Act 2008 (2050 Target Amendment) Order 2019) to a 100% reduction from 1990 levels by 2050- in other words, to net zero carbon.
- 3.2 Specific to planning, Section 19 of the Planning and Compulsory Purchase Act 2004 states that: "*Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to climate change.*"

### National Planning Policy Framework (NPPF, 2019)

- 3.3 National policy places high importance on addressing climate change in plan making and decision taking, as highlighted by the paragraphs below.

#### Extracts of NPPF

*'Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways... [including] an environmental objective... mitigating and adapting to climate change, including moving to a low carbon economy.'* (para 8)

*'Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... planning measures to address climate change mitigation and adaptation.'* (para 20)

*'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'* (para 148)

*'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'* (para 149)

*'New development should be planned for in ways that...avoid increased vulnerability to the range of impacts arising from climate change... and can help to reduce greenhouse gas emissions, such as through its location, orientation and design...'*(para 150).

*'To help increase the use and supply of renewable and low carbon energy and heat, plans should: a) provide a positive strategy for energy from these sources...b) consider identifying suitable areas for renewable and low carbon energy sources... c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for collocating potential heat customers and suppliers'* (para 151).

*'Local planning authorities should support community-led initiatives for renewable and low carbon energy...'. (Para 152)*



## National Planning Practice Guidance (NPPG)

- 3.4 Further to national policy, the NPPG sets out examples of how to mitigate climate change by reducing emissions (Paragraph: 003 Reference ID: 6-003-20140612). It gives examples such as:
- Reducing the need to travel and providing for sustainable transport
  - Providing opportunities for renewable and low carbon energy technologies
  - Providing opportunities for decentralised energy and heating
  - Promoting low carbon design approaches to reduce energy consumption in buildings, such as passive solar design
- 3.5 It also details considerations for adapting to a changing climate (Paragraph: 003 Reference ID: 6-003-20140612), such as:
- Considering future climate risks when allocating development sites to ensure risks are understood over the development's lifetime
  - Considering the impact of and promoting design responses to flood risk and coastal change for the lifetime of the development
  - Considering availability of water and water infrastructure for the lifetime of the development and design responses to promote water efficiency and protect water quality
  - Promoting adaptation approaches in design policies for developments and the public realm
- 3.6 The NPPG also highlights the importance of integrating adaptation and mitigation approaches (Paragraph 004 Reference ID: 6-004-20140612):
- '...local planning authorities should pay particular attention to integrating adaptation and mitigation approaches and looking for 'win-win' solutions that will support sustainable development. This could be achieved in a variety of ways, for example:*
- *by maximising summer cooling through natural ventilation in buildings and avoiding solar gain;*
  - *through district heating networks that include tri-generation (combined cooling, heat and power); or*
  - *through the provision of multi-functional green infrastructure, which can reduce urban heat islands, manage flooding and help species adapt to climate change – as well as contributing to a pleasant environment which encourages people to walk and cycle.*
- Local planning authorities should be aware of and avoid the risk of maladaptation (adaptation that could become more harmful than helpful). For example, designing buildings to maximise solar gain in winter without thinking through the implications for overheating in summer.'*
- 3.7 The NPPG clarifies what local planning authorities can do in terms of setting higher energy performance standards than the building regulations (Paragraph: 012 Reference ID: 6-012-20190315). In summary, they:
- Can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes.
  - Are not restricted or limited in setting energy performance standards above the building regulations for non-housing development.

## Implementing national policy and guidance at a local level

- 3.8 The above national policy and guidance applies to the planning system as a whole, and it does not follow that this SPD should, or even is lawfully able, to cover it all. As discussed in section 1, much of the above is reserved (by legislation) to be matters which can only be addressed in Local Plans (or 'Development Plan Documents' (DPDs) to give them their proper legal title) or Neighbourhood Plans. As a reminder, an SPD is not a Local Plan, DPD or Neighbourhood Plan.

## East Cambridgeshire District Council Local Plan (2015)

- 3.9 The Local Plan's spatial vision, which was drafted in the years approaching April 2015, states that in 2031, *"...the challenges presented by climate change will have been embraced, with new development being located and designed to minimise resource and energy use and reduce the risk of flooding. Renewable energy production will have increased, and a proportion of all energy will be created from local renewable sources such as bio-fuels, biomass, and wind power."*
- 3.10 The Local Plan goes on to set out various strategic policies aimed at achieving the wider vision, and includes specific policies aimed at reaching the visions' goals in respect of climate change. The key policies focusing on addressing climate change are ENV 4, ENV 5 and ENV 6, replicated below.
- 3.11 However, the provisions set out in Policy ENV 5 were (due to subsequent national policy changes) never progressed post adoption of the Local Plan in April 2015, and no Allowable Solutions Framework or Community Energy Fund presently exists, or is being progressed at present.
- 3.12 Also, the provisions of Policy ENV 6 are predominantly covered in already adopted supplementary planning documents, as discussed later in this section.
- 3.13 This SPD therefore predominantly focusses on providing addition guidance to the implementation of ENV 4.

## Extracts from the East Cambridgeshire Local Plan, 2015

### **ENV 4 Energy and water efficiency and renewable energy in construction**

All proposals for new development should aim for reduced or zero carbon development in accordance with the zero carbon hierarchy: first maximising energy efficiency and then incorporating renewable or low carbon energy sources on-site as far as practicable.

Applicants will be required to demonstrate how they have considered maximising all aspects of sustainable design and construction, as set out in the Code for Sustainable Homes (or its successor). Developments of 5 or more homes are required to achieve Code for Sustainable Homes Level 4 (or its replacement pending implementation of the zero carbon homes requirement). All non-domestic developments of 1000m<sup>2</sup> or more are required to meet BREEAM Very Good standard or equivalent.

The Council will negotiate with applicants over the most appropriate solutions for historic buildings and Conservation Areas.

### **ENV 5 Carbon offsetting**

Where allowable solutions are required for a development scheme, the Council will be prepared to accept alternative provision in line with the national Allowable Solutions Framework.

Where a local Community Energy Fund exists, developers will be expected to provide financial contributions to this Fund to offset the difference. The contribution will be used to finance specific renewable energy projects within the local area. Financial contributions will be required into CEF where developments do not achieve the CO<sub>2</sub> reductions required under Policy ENV 4.

### **ENV 6 Renewable energy development**

Proposals for renewable energy and associated infrastructure will be supported, unless their wider environmental, social and economic benefits would be outweighed by significant adverse effects that cannot be remediated and made acceptable in relation to:

- The local environment and visual landscape impact.
- Impact on the character and appearance of the streetscape/buildings.
- Key views, in particular those of Ely Cathedral.
- Protected species.
- Residential amenity.
- Safeguarding areas for nearby airfields; and
- Heritage assets.

Renewable energy proposals which affect sites of international, national and local nature importance or other irreplaceable habitats will be determined against the relevant sections of Policy ENV 7.

The visual and amenity impacts of proposed structures will be assessed on their merits, both individually and cumulatively.

Provision should be made for the removal of facilities and reinstatement of the site, should they cease to operate.

### **Fit between this Climate Change SPD and other existing SPDs**

3.14 The Council already has a number of adopted SPDs, including the ones briefly reviewed below. The SPDs below remain in force until they are either withdrawn or otherwise superseded. This SPD does not in any way override them. As can be seen, the following SPDs already cover significant elements relevant to the theme of climate change.

#### **East Cambridgeshire Renewable Energy Development (Commercial Scale) SPD (2014)**

3.15 The Renewable Energy Development (Commercial Scale) SPD<sup>1</sup> details the considerations and requirements for applicants in relation to:

- Visual landscape impact and key views
- Heritage assets
- Biodiversity and geology
- Residential Amenity
- Safeguarding areas
- Access and Public Rights of Way (PROW)
- Site restoration and continuation of agricultural use
- Wind turbines and electromagnetic transmissions

3.16 For any renewable energy proposal in the district, that SPD remains an important document to assist in the preparation of proposals, and their subsequent determination.

#### **East Cambridgeshire Natural Environment SPD (September 2020)**

3.17 Biodiversity and nature issues are not covered in this Climate Change SPD, but are addressed in a separate SPD - the 'Natural Environment SPD<sup>2</sup>', which was adopted in September 2020.

3.18 The Natural Environment SPD provides advice on policy requirements relating to issues such as: 'net gain' in biodiversity through development proposals; protection and provision of trees; protection of existing nature sites, including technical advice in terms of discharging Habitat Regulation Assessments (HRA) obligations, especially in relation to swan and goose foraging in designated protection zones around the Ouse Washes; and supporting the Council's position in relation to the recently adopted Local Nature Partnership vision to 'double land for nature' by 2050 across Cambridgeshire.

#### **East Cambridgeshire Design Guide Supplementary Planning Document (2012)**

3.19 The Design Guide SPD<sup>3</sup> is a comprehensive document that includes numerous considerations which relate to climate change and sustainable development, with the most important set out below. This Climate Change SPD does not duplicate these considerations, but in some cases, it does offer additional guidance.

##### **Extracts from the Design Guide SPD (2012)**

###### **Energy Conservation / Generation**

All dwellings should be designed to reduce their carbon footprint and to be as sustainable and as self-sufficient as possible. The following issues should be considered:

- Orientation;
- Solar generation of heat and electricity;
- Ground source heat pumps;
- Future technologies;
- Storage and recycling of water;
- Use of sustainable urban drainage systems (SUDS). The only exception would be foul drainage, where the preference is for connection to the public drainage system;

<sup>1</sup> [https://www.eastcambs.gov.uk/sites/default/files/Renewable%20Energy%20SPD%20Final\\_0.pdf](https://www.eastcambs.gov.uk/sites/default/files/Renewable%20Energy%20SPD%20Final_0.pdf)

<sup>2</sup> <http://www.eastcambs.gov.uk/local-development-framework/supplementary-planning-documents>

<sup>3</sup> [https://www.eastcambs.gov.uk/sites/default/files/FINAL%20design%20guide%202012\\_0.pdf](https://www.eastcambs.gov.uk/sites/default/files/FINAL%20design%20guide%202012_0.pdf)

All dwellings should be designed to the highest possible standard. This shall not be less than Code 4 of the Code for Sustainable Homes 2008.

- Buildings wrapped in insulation
- Maximum air tightness in construction
- Use of lime mortars and renders
- Organic building materials
- Sustainable timber use
- Solvent free paints
- Low water use systems (i.e. toilets, washing machines, etc)

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### **Renewables (The Historic Environment)**

Renewable energy installations on historic buildings must be carefully considered to ensure they do not have a detrimental impact. The roof-scape of historic towns and villages is distinctive, and installations should be avoided on principal elevations.

- Rear, and non-visible, roof slopes and locations are preferable for installations;
- The use of outbuildings to accommodate installations will be encouraged;
- Planning permission is always required for installations on, or within, the curtilage of a Listed Building;
- Ground source heat pumps may be acceptable in some cases. These may require planning permission and will nearly always require Listed Building Consent. They may also require archaeological investigation;

The mounting of wind turbines on buildings will not be encouraged, as this can have a dramatic impact on roof lines and views. Where possible, turbines should be located on the ground. Where the building is listed, regard must be given to the setting and context of the site/building.

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### **Renewables – Small Scale**

The following criteria must be addressed for any application to be successful:

- The individual or cumulative impact of turbines on the countryside/landscape;
- An exploration of the possibility of shared provision/use of the power generation with adjacent dwellings/buildings;
- The effect on the proposal on any designated landscape areas or historic views (e.g of Ely Cathedral);
- Whether the development achieves a net environmental gain;
- The effects of noise generation, vibration, shadow flicker and electromagnetic disturbance;
- As assessment of the chosen structure, paying particular regard to design, height, number, colour, density, positioning (particularly if on a building) and blade diameter (for turbines);
- Whether it is to serve local development or to supply the national grid;
- For roof-mounted panels, they will need to be as unobtrusive as possible. In Conservation Areas, this will generally mean positioning them on the rear elevation, or on outbuildings away from public views;
- Consideration must be given to any adverse effects on protected species and habitats, and if applicable, bird migratory routes.

Photomontages will be an important part of any submission, together with the information to deal with all of the issues indicated above, where relevant.

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## Renewables - Wind turbines over 15m in height

The initial criteria to be applied to wind turbine schemes will be as follows:

### Recommended separation distances

Residential settlements/residential dwellings	600m
General settlements, villages, campsites, tourist development	
Isolated dwellings	600m
SSSIs or Ramsar sites	500m
Woodlands and hedgerows	50m buffer to edges of the rotor swept area
Watercourse or water body	Fall-over distance
Public highways	Blade tip height + 50m
Bridle Ways	Minimum of 200m
Footpaths	Should not oversail

Individual dwellings and groups of up to 9 dwellings should not have turbines in more than 180 degrees of their field of view for a distance of 10 km. Settlements of 10 dwellings or more should not have turbines in more than 90 degrees of their field of view for a distance of 5 km.

### Landscape and visual impacts

- The siting of turbines should be determined by the direction and flow of the landscape and its contours;
- Layouts should be designed to avoid visual confusion and disordered clutter;
- There should not be 'tangles' of turbines where multiple turbines are seen behind each other;
- There should not be isolated turbines that are remote from the rest of the group;
- Within the Green Belt, turbines will only be permitted if they do not compromise the openness of the Green Belt or the purposes for which it was created;
- There should be no more than 9 turbines per square kilometre.

### Other issues

Other issues that will have to be addressed in any application relate to:

- Noise levels which, in relation to residential dwellings, should not give rise to any significant increase in noise above the ambient background levels i.e. no greater 45dB LAEQ, 5 min at 1 metre from the window of a habitable room;
- The effect on heritage assets;
- Safety, particularly in relation to ice build up, where the formula  $d=(D + H) \times 1.5$  should be used with 'd' being the maximum falling distance of ice in metres; 'D' being the rotor diameter in metres, and 'H' being the hub height in metres;

The effects of flicker, both on residential amenity caused by light issues, and any effects on electrical equipment.

## 4 Reducing carbon dioxide emissions

- 4.1 Local Plan policy ENV4, *Energy and water efficiency and renewable energy in construction*, sets a requirement for all new development to aim for reduced or zero carbon, in accordance with the zero-carbon hierarchy.
- 4.2 Proposals of 5 dwellings or more, or 1000m<sup>2</sup> or more for non-residential development, are required by policy ENV4 to ‘demonstrate how they have considered maximising all aspects of sustainable design and construction’ and, for residential development, are required to achieve Code for Sustainable Homes Level 4 (or its replacement) or, for non-residential, BREEAM Very Good (or equivalent).
- 4.3 The Code for Sustainable Homes was withdrawn by Government in 2015. However, NPPG, as updated in March 2019, (Ref 6-012-20190315) states as follows:
- “The [Written Ministerial Statement on Plan Making](#) dated 25 March 2015 clarified the use of plan policies and conditions on energy performance standards for new housing developments. The statement sets out the government’s expectation that such policies should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes (this is approximately 20% above current Building Regulations across the build mix).”*
- 4.4 It can be seen, therefore, that the 2015 Local Plan, which seeks Code Level 4, remains broadly consistent with the latest (March 2015, reiterated March 2019) national position. However, this SPD cannot seek to go beyond either national policy or Local Plan policy on this matter. The national guidance, above, also makes it clear that only the aspects relating to the energy requirement of Code Level 4 can be sought (not the wider aspects of the Code).
- 4.5 The ENV4 policy requirement for non-residential proposals of 1000 sq m or more, namely to achieve BREEAM Very Good, remains appropriate and deliverable because BREEAM remains in place as a national standard.
- 4.6 CC1 below outlines how the requirements of ENV4 could be met, and also sets out the desired standard for development that is below the thresholds referred above, and also development that involves conversion or change of use.

### CC1: Reducing carbon dioxide emissions and maximising all aspects of sustainable design and construction

#### **Energy hierarchy and sustainable design**

Local Plan (2015) Policy ENV4 states:

*All proposals for new development should aim for reduced or zero carbon development in accordance with the zero carbon hierarchy: first maximising energy efficiency and then incorporating renewable or low carbon energy sources on-site as far as practicable.*

And:

*Applicants will be required to demonstrate how they have considered maximising all aspects of sustainable design and construction...*

In order for an applicant to demonstrate how the above Local Plan policy requirement is to be met, a Sustainability Statement could usefully be prepared and submitted as part of the Design and Access Statement. The Sustainability Statement could outline the applicant's approach to:

- a. Minimising demand for energy through design;
- b. Maximising energy efficiency through design;
- c. Carbon dioxide reduction achieved through items a and b above, and through incorporation of renewable and low carbon energy sources;
- d. Water efficiency (including whether, for residential development, the design intends to voluntarily incorporate the Part G Building Regulations option of estimated water

consumption set at no more than 110 litres per person per day, rather than the standard 125 l/p/d);

- e. Site waste management;
- f. Use of materials (such as low carbon-embodied materials); and
- g. Adaptability of the building, as the climate continues to change.

More generally, such a Statement could usefully explain where, if any, the development proposes, on any of the above themes, to go beyond what is the statutory minimum in Building Regulations.

For developments of 5 dwellings or more, the Statement could explain how the development will meet the policy requirement in ENV 4, which requires such development to “achieve Code for Sustainable Homes Level 4”. For the avoidance of doubt, and following the Ministerial Statement of March 2015, the requirement to meet the Code for Sustainable Homes Level 4 only applies to that aspect of Level 4 relating to energy performance standards for new housing or the adaptation of buildings to provide dwellings. Other aspects of Level 4 are encouraged, but not required to be met. Level 4 should result in, across the build mix, energy efficiency improvements 20% above present (as at Jan 2021) Building Regulations.

Whilst not a requirement, developers are encouraged to consider the benefits of building to a higher than required standard of environmentally conscious design, for example Passivhaus Standard or achieving a Home Quality Mark<sup>4</sup>.

For non-residential development of 1000m<sup>2</sup> or more, the Statement could explain how the development has met policy requirement in ENV 4, which requires the development “to meet BREEAM Very Good standard or equivalent.”

If a Sustainability Statement (or similar) is not submitted, and it is not evident from the application how Policy ENV4 is to be met, then, instead of a potential refusal, the Council may instead, at its discretion, apply a condition to any approval along the lines of the following template conditions:

- (Outline approvals) *Prior to or as part of the first reserved matters application, an energy and sustainability strategy for the development, including details of any on site renewable energy technology and energy efficiency measures, shall be submitted to, and will need approving in writing by, the Local Planning Authority. The development shall be carried out in accordance with the approved strategy.*
- (Full permission) *Prior to the commencement of development, an energy and sustainability strategy for the development, including details of any on site renewable energy technology and energy efficiency measures, shall be submitted to, and will need approving in writing by, the Local Planning Authority. The development shall be carried out in accordance with the approved strategy.*
- (non-residential permission) *The development hereby approved shall meet BREEAM Very Good standard or equivalent. If this standard cannot be achieved by virtue of the site's location then prior to above floor slab construction works it must be demonstrated by a BRE Licensed Assessor how all other BREEAM standards have been fully explored in order to meet the highest standard of BREEAM Good or equivalent and agreed in writing by the Local Planning Authority. A certificate, following post construction review, shall be issued by a BRE Licensed Assessor to the Local Planning Authority, indicating that the relevant BREEAM standard has been achieved or its equivalent within six months of first occupation of the site for written agreement by the Local Planning Authority.*

#### **Low and zero carbon energy networks**

Developers are encouraged to incorporate renewable / low carbon energy generation provision onsite, or connect into an existing nearby renewable, low or zero carbon energy generation network where they exist.

<sup>4</sup> <https://www.homequalitymark.com/>



**Combined heat and power (CHP)**

In the case of large-scale residential development, and non-residential developments of 1000m sq or more, developers could consider the inclusion of Combined Heat and Power (CHP) generation or a network connection to an existing CHP facility.

However, the use of other technologies - for example solar photovoltaics or thermal systems, wind turbines, biomass heating or ground source heating – are also encouraged and may provide a better solution than CHP on a case by case basis.

## 5 Reducing energy demand in existing buildings

- 5.1 Whilst there is significant new development planned for the district, the vast majority of buildings that will be occupied over the coming decades will be those built in earlier times when energy and performance standards were much lower than at present.
- 5.2 An Energy Performance Certificate (EPC) provides details of the energy performance of a property and is required for properties when constructed, sold or let.
- 5.3 The Minimum Energy Efficiency Standards (MEES) Regulations require all applicable properties<sup>5</sup> to achieve an Energy Performance Certificate (EPC) of E or better. Separately, the Clean Growth Strategy (2017)<sup>6</sup> has set a target for as many buildings as possible to achieve an EPC of C by 2030/35 and commits to keep energy efficiency standards under review.
- 5.4 Also of value, and supported by the Council, is PAS 2035:2019 Retrofitting Dwellings for Improved Energy Efficiency: Specifications and Guidance. Whilst targeted at existing homes (rather than new development, or home extensions) it is a key document in a framework of new and existing standards on how to conduct effective energy retrofits of existing buildings. It covers how to assess dwellings for retrofit, identify improvement options, design and specify Energy Efficiency Measures (EEM) and monitor retrofit projects.
- 5.5 The standard drives the 'whole house approach' including the 'fabric first' methodology. It defines the qualifications and responsibilities of individual retrofit roles and respective activities required prior and post EEM installation. TrustMark Registered Businesses carrying out work within its scope are required to be compliant with its requirements, so if you are planning to have work done on your home, you may wish to ask about PAS 2035 and whether the builder is a TrustMark registered business. Further details available here:
- [www.trustmark.org.uk/ourservices/pas-2035/](http://www.trustmark.org.uk/ourservices/pas-2035/)
- 5.6 While the Local Plan (2015) does not set any policy requirements for development related to existing buildings, CC2 below aims to assist in improving the energy efficiency of existing buildings, complementing both Policy ENV 4 requirement that “*All proposals for new development should aim for reduced or zero carbon development*” and the Council’s Environment Plan<sup>7</sup>.

### CC2: Reducing energy demand in existing buildings

For all development proposals which involve the change of use of a building, or an extension to an existing building, the applicant is encouraged to look at all opportunities to improve the energy efficiency of that building (including the original building, if it is being extended)\*.

Proposals which do consider and take such viable opportunities will, in principle, be supported.

In particular, residential properties which, following an extension or conversion, will achieve an improved EPC rating overall will, in principle, be supported. To gain this in principle support, a pre-

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<sup>5</sup> The Minimum Energy Efficiency Standard (MEES) which came into force in England and Wales on 1 April 2018, applies to private rented residential and non-domestic property and is aimed at encouraging landlords and property owners to improve the energy efficiency of their properties by a restriction on the granting and continuation of existing tenancies where the property has an Energy Performance Certificate Rating of F and G.

[The Energy Efficiency \(Private Rented Property\) \(England and Wales\) Regulations 2015 \(Principal Regulations\)](#) as amended by [The Energy Efficiency \(Private Rented Property\) \(England and Wales\) \(Amendment\) Regulations 2016](#) and [Energy Efficiency \(Private Rented Property\) \(Amendment\) Regulations 2019](#)

<sup>6</sup> <https://www.gov.uk/government/publications/clean-growth-strategy>

<sup>7</sup> <https://www.eastcambs.gov.uk/sites/default/files/agendas/5%20-%20080620%20V12%20ApA.pdf>

development EPC should be provided as part of the application, together with evidence as to how a completed development EPC is likely to be rated.

More generally, for any work on a residential property, the Council encourages the use of the PAS 2035:2019 Specifications and Guidance.

*\*Note: for any heritage asset, any improvements to the energy efficiency of that asset must not cause harm to, or loss of, the significance of the asset. This may limit any feasible energy efficiency improvements.*

## 6 Resilient and adaptable design

- 6.1 East Cambridgeshire will need to adapt to the impacts of extreme weather and climate change. In addition to the various measures set out in the Local Plan (such as managing flood risk; promoting sustainable drainage systems; protecting and enhancing the green infrastructure network, the natural environment and biodiversity), there must be greater resilience to extreme weather conditions in the built environment.
- 6.2 Furthermore, the built environment should be built to last: buildings should be designed in a way that they are adaptable and can be fit for purpose in the long term, even if their use changes. Adaptable building design avoids, or at least minimises, waste, the use of materials, and overall emissions from the demolition and redevelopment of buildings that are no longer fit for purpose and incapable of being easily changed.
- 6.3 CC3 offers support for resilient and adaptable design, and complements Policy ENV 4 which requires that “all proposals for new development should aim for reduced or zero carbon development.”

### CC3: Resilient and adaptable design

#### Heat resilience

In order to prevent and minimise the impacts of overheating in the built environment, applicants are encouraged to demonstrate, commensurate with the scale and location of the proposal, consideration of:

- a. how the design of the development minimises overheating and reduces demand on air conditioning systems, including considering:
  - orienting buildings to maximise the opportunities for both natural heating and ventilation and to reduce wind exposure; and
  - measures such as solar shading, thermal mass and appropriately coloured materials in areas exposed to direct and excessive sunlight;In considering the above, the balance between solar gain versus solar shading will need to be carefully managed.
- b. the potential to incorporate a green roof and/or walls to aid cooling, add insulation and enhance biodiversity.

#### Adaptable design

Applicants are encouraged to design proposals to be adaptable to future social, economic, technological and environmental requirements in order to make buildings both fit for purpose in the long term and to minimise future resource consumption in the adaptation and redevelopment of buildings in response to future needs. To meet this desire, applicants are encouraged to consider the following, where applicable:

- a. Allow for future adaptation or extension by means of the building’s internal arrangement, internal height, detailed design and construction, including the use of internal stud walls rather than solid walls to allow easier reconfiguration of internal layout;
- b. Provision of internal space to successfully accommodate ‘home working’;
- c. Provision of electric car charging infrastructure;
- d. Infrastructure that supports car free development and lifestyles;
- e. Having multiple well-placed entrances on larger non-residential buildings to allow for easier subdivision; and
- f. Is resilient to flood risk, from all forms of flooding.

## 7 Safeguarding renewable and low carbon energy sources

- 7.1 Local Plan policy ENV 6 supports the development of renewable energy.
- 7.2 CC4, below, aims to safeguard renewable energy sources in order to ensure the continued operation of renewable energy generating technology. The Council also recognises the importance of low carbon energy sources, therefore CC4 applies to both renewable and low carbon energy sources.

### CC4: Safeguarding renewable and low carbon energy sources

In order to ensure that East Cambridgeshire can maximise its outputs from renewable and low carbon energy sources, development will be strongly resisted if it would result in significant harm to any existing or approved renewable or low carbon energy generation facility and/ or associated infrastructure. Specifically, it is important that development avoids harming:

- a. the performance of any existing or approved renewable/ low carbon energy generation facility; or
- b. the potential for optimisation of strategic renewable energy / low carbon installations; or
- c. the availability of the required resource, where the operation is dependent on uninterrupted flow of energy to the installation.



East Cambridgeshire  
District Council

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**Climate Change  
Supplementary  
Planning Document  
(SPD) – Reg 12(a)  
Consultation  
Statement**

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Version 2 – at adoption stage -  
January 2021

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## **1. Introduction**

- 1.1. The Town and Country Planning (Local Planning) (England) Regulations 2012 requires the Council to consult the public and stakeholders before adopting a Supplementary Planning Document (SPD). Regulation 12(a) requires a Statement to be prepared setting out who has been consulted while preparing the SPD; a summary of the main issues raised; and how these issues have been addressed in the final SPD.

## **2. Consultation Undertaken up to and including 12 October 2020**

- 2.1. In preparing the draft SPD, internal consultation within the Council took place and this resulted in the drafting and refining of the content of the consultation version draft SPD. The draft was subsequently considered by Finance and Assets Committee of the Council on 24 September 2020, where it was approved for the purposes of public consultation. The papers for that meeting (including a copy of the draft SPD) were publicly available on the Council's website seven days prior to the meeting taking place.
- 2.2. No external consultation took place on or before 12 October 2020.

## **3. Public consultation, from 13 October and 23 November 2020**

- 3.1. Public consultation started on 13 October 2020 and ended on 23 November 2020. Only comments made during that period have been considered.
- 3.2. A copy of the draft SPD was made available for public inspection, free of charge on the Council's website at; [www.eastcambs.gov.uk/local-development-framework/supplementary-planning-documents](http://www.eastcambs.gov.uk/local-development-framework/supplementary-planning-documents)
- 3.3. An email was sent out to all consultees on our database. A copy of the email is attached at appendix A. Nearly 480 emails were sent out. These included statutory consultees, local businesses, local organisations, individuals who wish to be informed of planning documents consultations and other stakeholders (see full list at Appendix B). All the comments we received were via email.

## **4. Representations received**

- 4.1. We received 86 comments from 13 separate organisations and individuals to the Climate Change SPD. All the comments received are recorded in table 1 below. The Council has responded to each comment and this is recorded in the Council's Response column. Where changes are proposed to the SPD as a result of these comments, this is clearly shown in the Action Column of the table below. These changes are then included in the adopted version of the SPD.
- 4.2. While most of the comments were seeking changes to the SPD, there were some in support of the SPD. Several respondents highlighted that the SPD should not go beyond its remit and scope.

## 5. Issues Raised during consultation and how they have been addressed

Table 1: Summary of issues raised and ECDC's response

Comment ID	Consultee Name  Chapter/ Para. No./ Policy No.  Support/ Object/ Observation	Comments	Council's Response	Action
CLC-01	Anthony Jolley  Observation	The Council has a significant role to play in protecting and improving open spaces particularly safeguarding the contribution the Green Belt makes in support of the environment in this epoch of climate change. Furthermore, the Council has a responsibility as a guardian of green open spaces to protect these for future generations particularly in recognition of the current Climate Emergency.	Comments noted.	No change to SPD
CLC-02	Anthony Jolley  Observation	The loss of green open spaces has been, and still is, the greatest factor affecting climate change in Britain. Over 97% of Britain's meadows and green spaces have been lost since the 1930s, along with the species of flora and fauna that rely on them for a sustainable habitat. The building of roads, industry or housing in protected areas has often taken priority. Even if these ecosystems are not wholly destroyed by development they may be fragmented into smaller areas, which may be too small for them to remain a viable weapon against climate change.	Comment noted.	No change to SPD
CLC-03	Anthony Jolley	Much of the Green Belt in the area of Bottisham is categorised as chalk grassland helping to sustain a valued ecosystem. The benefits of this ecosystem in helping to reduce the effects of climate change	Comments noted.	No change to SPD



	Observation	include but are not limited to carbon storage, water retention and an established habitat for crop pollinators and indigenous wildlife.		
CLC-04	Anthony Jolley Observation	While the impacts of climate change are daunting, there is growing recognition that Green Belts can be part of the climate solution - the Green Belt's ecosystem is hence indispensable. It reduces the harmful carbon pollution that is driving climate change; it protects people and infrastructure from increasingly severe, flooding, heat waves and droughts; and it also directly reduces some of the primary public health challenges that are exacerbated by climate change.	Comments noted.	No change to SPD
CLC-05	Anthony Jolley Observation	The GB with its open spaces assists in building social cohesion. A community's ability to withstand climate disasters and come back stronger is determined, in large part, by the social fabric of the community. In times of adversity, this social cohesion can define the successes or failures of a community. The Green Belt, parks and open space directly improve environmental resilience; moreover, they build social and economic resilience.	Comments noted.	No change to SPD
CLC-06	Anthony Jolley Observation	No model can predict what nature will or will not do, especially when nature has been distressed by the loss of its ecosystem and degradation. Common sense on the other hand is an humanitarian skill which indicates that such infringements cause more harm than good.	Comments noted.	No change to SPD
CLC-07a	Dr Catherine Judkins Para 3.18 Observation	This section details a number of measures that should be taken into account when considering a commercial scale renewable energy development. There is mention of safeguarding - presumably this means security measures etc. However, safety should also be a consideration. Renewable energy technology is evolving at a rapid pace, so safety guidance will inevitably trail behind. This is particularly relevant to Lithium-ion battery energy storage systems (BESS) that are sometimes installed alongside solar PV sites. There are well documented fire risks with these systems; large scale BESS are rather 'experimental' at this time, as there are not many in operation globally. The siting of BESS should, therefore, be a major consideration from a health and safety perspective, particularly large-scale installations.	Comments noted.  Paragraph 3.18 is a summary of the adopted East Cambridgeshire Renewable Energy Development (Commercial Scale) SPD (2014)	No change to SPD

CLC-07b	Dr Catherine Judkins Para 3.18 Observation	Regarding site restoration for agricultural use. Is ECDC not looking for long-term, sustainable solutions for slowing Climate Change? If land is needed for agricultural use, then other locations for solar PV installations or other renewable supplies should be prioritised (e.g. rooftop installations for solar, brownfield sites, etc should be encouraged). There is very little point of a 'temporary' solar energy supply to help slow a permanent climate problem. The Climate Crisis is here to stay, so we need forward-thinking, long-lasting solutions.	<p>Comments noted. In response:</p> <p>Please see <a href="#">East Camb's Environment Plan</a> (A Strategy and Action Plan to Boost the Environment and Help Mitigate Climate Change, June 2020) for details of ECDC's actions following its declaration of a climate emergency in 2019.</p> <p>While ECDC agree that forward thinking, long lasting solutions are needed, unfortunately, the scope of the Climate Change SPD is limited, given that it can only add further detail to the policies in the Development Plan ('Local Plan'), and cannot add new or revised policy criteria.</p>	No change to SPD
CLC-07c	Dr Catherine Judkins Para 3.18 Observation	As an increasing number of ground mounted large scale solar PV farms are being developed in greenfield areas, the cumulative impact of these should be taken into account so as to avoid industrialisation of the countryside. Including assessing such installations that might fall under neighbouring council jurisdictions. How are you proposing to monitor this?	<p>Comments noted. In response:</p> <p>ECDC comment on planning applications, including solar applications, in neighbouring authorities where appropriate.</p> <p>The cumulative impact of solar farms is addressed by Local Plan policy ENV6 Renewable Energy Development, which states "...The visual and amenity impacts of proposed structures will be assessed on their merits, both individually and cumulatively...."</p> <p>The Council can reassure that cumulative impacts are always a</p>	No change to SPD

			consideration for all forms of development proposals.	
CLC-07d	Dr Catherine Judkins Para 3.21 Observation	According to Natural England's document on the ecological impact of solar farms ("Evidence review of the impact of solar farms on birds, bats and general ecology (NEER012)"), there is currently NO scientific evidence to support either a gain or loss in biodiversity as a result of ground mounted solar PV farms. Animal habitat loss is a concern with large scale developments on greenfield land due to the large amount of land required. This affects both rare/ in decline species, but also many other species that each play a vital role in the ecosystem. It is misleading to talk about 'net gains' in biodiversity, thus implying that any losses are not significant. It sounds like a kind of 'compensation scheme' - where loss of one species is ok, as long as it's countered with introduction of other species. This approach could have serious long-term implications. Many areas of farmland have existing nature sites within them/ along borders in order to provide wildlife habitats - is the protection of these mandatory? It would seem imprudent to disturb any existing wildlife habitats that are well established.	Comments noted Paragraph 3.21 is a summary of the adopted East Cambridgeshire Natural Environment SPD (2020).  The term 'net gain' is in national policy (NPPF), and a full definition and how it will operate forms part of the Environment Bill presently going through parliament.	No change to SPD
CLC-08	Dr Catherine Judkins Para 6.2 Observation	Sections 3.18 and section 6 appear to contradict each other. If the 'built environment should be built to last' and be resilient, adaptive, etc, ECDC should not be considering 'temporary' renewable energy farms. For Solar, ECDC should encourage more rooftop or brownfield installations, which do not need to be temporary and would offer long term, sustainable solutions.	Comments noted. In response, it is true that the vast majority of development should be built to last, so as to enable the maximum use of the resources 'consumed' by the development to occur. However, there are some exceptions, such as solar farms on greenfield land, where the development could be temporary (say, 20 years), and should be designed to be temporary, so that at the end of life it can easily be removed (and materials recycled) and return the land to its former use.  More widely, the Council is required to consider all planning applications made, whether for permanent or temporary structures.	No change to SPD

			While EDCDC agree that rooftop and brownfield installations can make a great contribution to lowering emissions, in the right locations greenfield site solar installations can make significant and immediate carbon savings, and can have the advantage of returning the land to its former use should future generations no longer require renewable energy production.	
CLC-09	Huntingdonshire District Council Observation	Huntingdonshire District Council are pleased to note that the SPD takes a proactive stance towards combating climate change.	Comments noted.	No change to SPD
CLC-10	Cllr Ian Lindsay, CoEC Observation	I was asked to comment on the subject draft SPD on behalf of the City of Ely Council at the Full Council meeting of 19 October 2020. I have studied the document closely and discussed it with the Chairperson of our Climate Change Working Party. I am content that the SPD is consistent with the existing planning advice related to climate change and adds to it. The document is easy to follow, and I cannot offer any improvements. I have not identified any additional topics that are needed, and on behalf of the City of Ely Council I agree the proposals.	Comments noted.	No change to SPD
CLC-11	George Ginn Object	I would like to offer some contribution to your consultation. I have read some of your concerns and proposals, and from that I gather that you do have real understanding of what we are all facing in the battle of climate change. I agree with what you have put down about the problem and the things we can all do to combat this real and growing threat of climate change. I disagree with your reluctance to promote the erecting of wind turbines, simply for their visual appearance. We have a Climate Emergency and beggars can't be choosers. I am not an expert but I have gained a lot of knowledge through six books that I have. I find myself disappointed with our leaders here and around the world, they talk up about Climate Change, I think mainly to get people on side, and also regard it as something that is distant and does not	Comments noted, and express clearly some of the key issues and challenges we face. In response to some specific points: In relation to wind turbines, wind turbines can only be approved if they are proposed on sites allocated in a Local Plan (sometimes referred as a Development Plan Document (DPD)) or Neighbourhood Plan. As an SPD, this document cannot lawfully allocate sites for wind turbine development. As	No change to SPD

	<p>require urgent and radical action now. All they seem to offer is setting targets of Net Zero Carbon emissions by 2050. Most people might be taken in by that, but we can never get to zero emissions because we all breathe CO2. The get out is in the word net and in an acrostic it reads Not Exactly True. The idea is that where we can't reduce our emissions we offset them in some way by carbon capture so making a kind of balance. There are several ideas put forward to reduce and eliminate emissions and they are all welcome. But one of the biggest emitters is meat production. Meat does not grow on trees. It has to be born, bred, fed, slaughtered and transported. Every aspect of this process is causing emissions and not only CO 2 but Methane and Nitrous Oxide which are far more potent. It also takes up large acres of land and uses vast quantities of water. And we need much more of this to feed a growing population if they still want meat in their diet. It may seem impossible for the majority to change their diets but there is a move towards Plant Based Food that resembles and taste like meat and at the same time is a healthier outcome. But meat production is hardly mentioned in the various ways of tackling climate change. I don't know if people realise that we never pay the true price of the meat we buy or the meals we have in restaurants, because of the heavy subsidy the producers receive. I did read that they get £250,000 and some of largest get up to £1 million and the EU was trying to keep it down to £250,000. In essence governments claiming they are taking measure to combat climate change are simply fuelling it.</p> <p>My first book that I had was entitled "Climate Change, what everyone needs to know" by Joseph Romm who was an American whose second edition was published in 2018, the first in 2016.</p> <p>The opening words in the preface are worth quoting. "Climate Change will have a bigger impact on your family and all of humanity than all the internet has had. Imagine if you knew a quarter-century ago how information technology and the internet were going to revolutionise so many aspects of life. Imagine how valuable that knowledge would have been to you and your family. It turns out that we have such advanced knowledge of hoe climate change will play out over the next quarter-century and beyond. And the purpose of this book is to provide you with this knowledge".</p>	<p>there are no sites allocated for wind turbines in the current Local Plan (2015), and to date no Neighbourhood Plan identifies any sites for wind turbine development, no wind turbine proposal (other than small scale 'domestic size') can be given planning permission in the District. We are monitoring any national policy shift on this matter.</p> <p>ECDC agree that the challenges faced are significant and warrant action from various bodies and organisations, and all individuals. Unfortunately, as an SPD (i.e. not a full Local Plan), the scope of this document is limited to building upon the content of the existing Local Plan- it cannot introduce new policy 'burdens' on developers or set new standards or criteria.</p>	
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	<p>He himself had been involved with various technologies aimed at combating the effects of climate change</p> <p>Another book, entitled “The decade we could have stopped climate change, losing earth” by Nathaniel Rich. Another American writer. The decade was 1979-1989. It said by 1979, we understood nearly everything we know today about climate change – including how to stop it. Over the next decade, a handful of scientists, politicians, and strategists, led by two unlikely heroes, risked their careers in a desperate, escalating campaign to convince the world to act before it was too late. Losing Earth was their story and ours. For a decade between 1979-1989 we had an excellent chance. The world’s major powers came within several signatures of endorsing a binding framework to reduce carbon emissions. What happened? The fossil fuel industry took a stand and spent vast sums of money to defeat climate change legislation. Over the years it is vested interests that have stopped any real global action taking place. All we have is conferences from time to time with nothing really moving forward allow countries have signed up to targets. America one of the greatest polluters has pulled out of the Paris accord and has gone back to coal mining. Australia not only continues with coal but exports it as well. Other books I have read not only point out the real threat of climate change but give great detail about why it is happening and how we can takes the right actions to deal with it. They are; “Don’t even think about it, why our brains are wired to ignore climate change” by George Marshall, “There is no Planet B, a handbook for the make or break years” by Mike Berners-Less, “How we are messing up our planet, and what we can do about it” Tony Jasper, “This is not a drill, an excellent Extinction handbook” by various authors. I also have the small booklet by Greta Thornburg a collection of her speeches she has made around the world at big gatherings. The most amusing was the one to our parliament, where on three occasions she asked if her microphone was switched on, implying her listeners were not taking her seriously in what she was telling them. I have also just finished the book by David Attenborough, “A life on our planet”. In it he clearly explains how we have arrived at climate change by our human activity by destroying biodiversity and the animal kingdom, which we rely on for our very existence. He paints a bleak picture if we do nothing, but he comes up with a lot of good ideas about the actions we take to</p>		
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	<p>reverse what is happening and presents ways in which we can get back to ways that are sustainable. And this is key, we have got to stop this ongoing strive for more and more growth and learn to live and work in which are sustainable. This book is a must for all who are truly endeavouring to deal with climate change. In much of our talk about climate change it is something it seems that we think about it now and do something later. But it is climate emergency and we must act now. The question of getting petrol and diesel vehicles off our roads as soon as possible for the twofold reason of emissions and harmful pollution that is attributable for 40,000 deaths per year. The has been kicked in the long grass first of all till 2040, but has been brought forward to 2030. But it is not what it seems, although I consider 2030 is still too late, it is not even in 2030 the time when these vehicles are off our roads, they will still be there long after 2040 and even 2050. I imagine without any government intervention the car makers will make as many as possible in 2029 and these will still be sold into 2030 and beyond. There needs to be a concentration now on electric vehicles like a war effort to get as many built as quickly as possible and charging points readily available everywhere. In other areas of action we need to plant as many trees as we can to absorb carbon, every building apart from the usual green spaces should plant a number of trees, at least one for each house. Although it is out of the districts remit to stop deforestation strong messages should go out to stop the felling of trees in the great forests of the world because this accelerates climate change. I am sorry this contribution is late but I hope it conveys the message that there is not is not too much we should be doing immediately to combat the change that is already with us. If it prevails in a short space of time Ely could become an island once again. I have produced a separate attachment about 2030 and vehicles</p>		
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CLC-12	George Ginn Observation	<p>It has been said that a third of all our emissions of greenhouse gases, come from transport and not only that but our petrol and diesel vehicles produce pollution that is attributable to 40,000 deaths a year. So for a twofold reason it is necessary to ban these vehicles as soon as we possibly can. During this pandemic governments of all countries have issued strong, clear and unpopular rules in order to try and combat Covid 19. But in the case of banning these emission and polluting vehicles our government have not set out a clear plan to achieve this. All they have said is that the sale of these current vehicles will be banned, first in 2040 and now brought forward to 2030. This in my opinion is still too late, but this statement given is so misleading and hides the truth. Car manufacturers can produce a record number of cars in 2029 which will still be sold and be on our roads long after 2030. What the government needs to do is to reduce the quantity of these vehicles from now on and get the manufacturers to begin producing more electric vehicles and increasing charging points. Instead of offering the vague statement of banning the sale of these vehicles from 2030, they should declare a strong and clear order that none of these vehicles will still be on our roads creating emissions and polluting our environment. Manufacturers should be given a time to stop building these vehicles as soon as possible and second-hand car sales should cease in 2030 for these older vehicles. Otherwise it will not achieve the object this vague statement seems to imply.</p>	<p>Comments noted. In response:</p> <p>In relation to vehicle emission, it is beyond the scope of this SPD to impose serious reforms and restrictions on vehicles and emissions: such action needs to come from Central Government and industry.</p>	No change to SPD
CLC-13	East Cambs CAN Object	<p>This is a response to the Climate SPD on behalf of East Cambs Climate Action Network; a group of local residents with professional experience relevant to efforts to achieve Net-Zero Carbon emissions in the district. Our members include architects, ecologists, energy efficiency professionals and people from other relevant backgrounds. Overall, we support the SPD, but in our opinion the SDP could be made a more powerful tool by referring to specific standards, tools and processes, many of which are already available. This would strengthen the requirements for new developments and renovation projects to ensure compliance with the stated net-zero greenhouse gas emissions by 2050 target. Below, we provide some constructive criticism of the SPD with a view to helping the council make it as useful as possible in helping the district achieve the net-zero target and comply with the council's stated goals on biodiversity. We do not</p>	<p>Comments noted. In response:</p> <p>In relation to the suggestion that the SPD could be made a more powerful tool by referring to specific standards, tools and processes, unfortunately, as a Supplementary Planning Document (i.e. not a Local Plan), the scope of this document is limited to building upon the content of the existing Local Plan- it cannot introduce new policy 'burdens' on developers or set new standards or criteria.</p>	No change to SPD



		consider the measures specified to be compatible with the declaration of a climate emergency and we would urge the council to be as ambitious as is within its power and work with businesses and other levels of government to make the necessary changes to planning required to meet the scale of the challenge. In turn this will create significant economic benefits to the local economy.		
CLC-14	East Cambs CAN Para 3.1 Object	Policy Review • The policy review cites the climate change act 2008 but does not refer to the 2019 amendment which changed the stated greenhouse gas target from 80% reduction by 2050 to net-zero emissions by 2050. This should be corrected.	Agreed. Thank you for pointing out this omission	Para 3.1 amended to reflect this comment
CLC-15	East Cambs CAN CC1  Object	CC1: Reducing carbon dioxide emissions - Sustainability statement This section seeks to encourage more developers to submit sustainability statements with their applications to show how proposed developments meet policy ENV4, and lists out what such a statement should include. We support this suggestion as it will encourage developers to consider sustainability at an earlier stage. However, the wording used - eg. 'minimise demand'; 'maximise efficiency' - is imprecise, and sustainability statements can easily be worded that appear to address the issues while in reality not going beyond the legislated requirements. To strengthen this section, we suggest that a life cycle assessment of both operational and embodied carbon is included as a topic within the sustainability statement. This would provide the planning authority with impartial, hard, comparable data, enabling them to come to decisions based on an objective understanding of a proposal's environmental impact. By starting to use life cycle assessments, both developers and planning officers will become more familiar with the figures involved. This section should also refer to recent research published by LETI and the RIBA, setting target figures for Net Zero operational and embodied carbon for different building typologies. (RIBA, 2019, 2030 Challenge; LETI, 2019, Climate Emergency Design Guide, Embodied Carbon Primer, and Archetype Pages). The inclusion of these figures would provide developers and planners with objective figures for the requirement of Policy ENV 4 for "reduced or zero carbon development".	Comments noted.  In principle, the suggestions made are supported. However, national policy and legislation does not presently allow for such requirements to be made of developers, particularly as this is only a SPD rather than a Local Plan. The scope of this document is limited to building upon the content of the existing Local Plan- it cannot introduce new policy 'burdens' on developers or set new standards or criteria  As national policy and legislation evolves, the measures suggested are the sorts of matters we would like to introduce in the future.	No change to SPD
CLC-16	East Cambs CAN CC2	This section relies on EPC's as a measure of existing energy efficiency and improvements. There are two issues with this approach:	Comments noted. In response, it is acknowledged that there is an industry wide issue in terms of forecast performance (EPC) and	Amend section 5 supporting text, and

	Object	<ul style="list-style-type: none"> <li>• Firstly, a number of reports have shown that EPCs are largely inaccurate as a measure of the actual energy use of the buildings (Jones Lang LaSalle (2012) A Tale of Two buildings. Are EPCs a true indicator of energy efficiency?; Nirushika Nagarajah, N and Davis, JJ (2019) Impacts of Inaccurate Area Measurement on EPC Rating)</li> <li>• Secondly, the SPD simply states that an improvement in the EPC level is sufficient to allow the proposed work to be supported. In order to reach Net Zero, significant retrofit of all our existing, inefficient building stock is required. Therefore asking for a simple improvement is not sufficient for meeting Net Zero. Incremental changes leading to small improvements can be problematic as they often make future improvements much more difficult to carry out</li> </ul> <p>We recognise that at this time, and in particular through an SPD, the Council cannot require specific targets of retrofit projects. However, section CC2 could refer to and offer guidance on how to follow PAS 2035, which sets out a process for evaluating the work required to a building and planning this in such a way that each stage does not prevent further work.</p> <p>Outside the scope of this consultation, we would strongly support community retrofit schemes, for example helping residents to work together to share the cost and hassle of upgrading their properties; and supporting them to access funding such as the current Green Homes Grant.</p> <p>There should be more on retrofit, community schemes, helping homes utilise the green homes grants (and future replacement schemes) especially in Conservation Areas and listed buildings as the timetable for implementation is so short - getting permission in time and doing the work is nearly impossible.</p> <ul style="list-style-type: none"> <li>• Often not enough time to submit a well-thought out scheme and get permission before deadlines to apply for grants.</li> <li>• Council should support local building professionals by providing financial incentives for them to get certified for energy efficiency grant schemes and train up retrofit coordinators.</li> <li>• Current schemes often cut out smaller contractors, will the council commit to helping local contractors acquire the certification required to qualify for government grants for energy efficiency measures or find alternative solutions such as the use of independent inspectors who</li> </ul>	<p>actual performance of buildings. The Council supports national measures trying to close the gap between forecast and actual performance, through training, monitoring and enforcement.</p> <p>However, in the short term, EPC assessment is a standardised, nationally recognised form of assessment and so is a useful tool.</p> <p>Furthermore, the planning system is very limited in what it can do in terms of the existing housing stock and retrofit.</p> <p>However, we welcome the suggestion regarding PAS 2035, and have included such reference in section 5 and policy CC2 (albeit we are not able to 'require' PAS 2035 to be used).</p> <p>Of the wider points made, these are noted and agreed, and the Council has taken what opportunities it can to promote available grants, and is in the process of bidding for grants which itself can spend on its own buildings or on more vulnerable households.</p>	<p>policy CC2, to encourage use of PAS 2035 guidance and specifications</p>
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		<p>could provide the certification requirements for contractors to qualify for these schemes. This is a major barrier to the uptake of these schemes.</p> <ul style="list-style-type: none"> <li>• Will the council commit to feeding back to other levels of government about the required changes to any future energy efficiency grant schemes?</li> </ul>		
CLC-17	East Cambs CAN Section 6 Object	<p>Any new public development should reach Zero Carbon Targets. Still today there are little discussions about alternative sites and/or re-utilisation of existing buildings. In terms of energy efficiency this is often a financial decision.</p> <ul style="list-style-type: none"> <li>• Can the SDP be more specific and require an assessment or a feasibility study on alternatives before a site for development is chosen?</li> <li>• The local plan does not appear to consider repurposing of existing buildings and there is a lack of information to guide developers to more climate friendly and resilient projects.</li> <li>• There is an urgent need to bring considerations of climate, sustainability, resilience and ecology forward in the planning stage in terms of identifying sites for development or redevelopment. Often by the time a site is selected many of the ecological impacts are locked in as mitigation can only achieve so much in terms of reducing the biodiversity impact of poorly sited developments.</li> <li>• More information about site selection needs to be passed on to architects and developers so they can do a better job of meeting the requirements of the site.</li> </ul>	<p>Comments noted. In response: Unfortunately, the SPD cannot be 'more specific', given its status as SPD and not a Local Plan.</p> <p>In relation to existing buildings, planning on the whole is limited in what it can do in terms of existing buildings and retrofit: planning can only have an impact in situations where planning permission is sought, and planning permission is not always required for changes to existing buildings (indeed, government is increasingly allowing change of use of buildings without the need for permission at all).</p> <p>In terms of site selection, this is noted and a matter for any future Local Plan, but the principles stated are agreed.</p>	No change to SPD
CLC-18	East Cambs CAN Section 6 Object	<ul style="list-style-type: none"> <li>• The council should encourage all businesses and council owned buildings with large roof surfaces to install solar panels. Other local authorities such as the City of Edinburgh council have had significant successes with community owned developments of this nature.</li> <li>• New developments should be future proofed to ensure they are compatible with projected developments in solar, hydrogen and electric charging point needs.</li> </ul>	<p>Comments noted.</p> <p>The Council does indeed encourage the installation of solar panels on roofs, but no doubt we could encourage more and this is the sort of matter we hope to take forward in our separate district wide Environment Plan (being prepared over 2021, with a Partnership Forum).</p>	No change to SPD

			In terms of new development, national policy and legislation does not presently allow for such requirements to be made of developers, particularly as this is only an SPD rather than a Local Plan. The scope of this document is limited to building upon the content of the existing Local Plan- it cannot introduce new policy 'burdens' on developers or set new standards or criteria.	
CLC-19	East Cambs CAN Object	We recognise that the SPD is restricted in scope, as it can only support the existing local plan, not require stronger standards. It is encouraging to see East Cambs set out so clearly the importance of tackling the climate emergency in its introduction to the SPD, however it is also clear that the measures that are currently within the Local Plan are not sufficient to meet the Climate Change Act. Therefore, the Local Plan itself must be strengthened in order for East Cambs to meet its obligation under the NPPF to "take a proactive approach to mitigating and adapting to climate change... In line with the objectives and provisions of the Climate Change Act 2008". The SPD should clearly set out East Cambs direction of travel, with their ambitions for the next local plan, in order to give developers the ability to plan ahead and take future requirements into account.	<p>The Council agrees with your summary of the limitations of an SPD.</p> <p>In terms of a new Local Plan, in Oct 2020 the Council decided not to proceed with a full Local Plan review, but instead prepare a very limited partial update of the 2015 Local Plan, relating exclusively to housing target requirements. A comprehensive new Local Plan is not likely to commence preparation until clarity on the Planning White Paper (and the separate Environment Bill and Energy Strategy white paper, as well as imminent Building Regulation amendments) has emerged. In the meantime, this emerging Climate Change SPD intends to act as a temporary bridge between the policies of the 2015 Local Plan and the policies of that future Local Plan (which could, as suggested, embed further strengthened policies on climate and wider environment, if national policy allows).</p>	No change to SPD

CLC-20	East Cambs CAN Object	<p>Need to re-assess the Local Plan.</p> <ul style="list-style-type: none"> <li>• Green infrastructure is an interesting topic – the SPD does not properly address the role of development and design of housing schemes in car dependency. We need to ensure that considerations concerning active travel, micro-mobility, electric charging points, access to public transport and the provision of local amenities within walking distance are vital to ensuring development does not lock in higher transport emissions.</li> <li>• Car-dependency also discriminates against those from disadvantaged backgrounds. Cars are expensive to run whereas bicycles and ebikes can provide safe, cheap and convenient transport when sufficient infrastructure is in place to facilitate this.</li> <li>• Commuting to Cambridge from Ely is impossible by bike when the land is overall levelled (fens!) and in Holland, this distance would be absolutely normal to cycle at any age with a safe infrastructure in place. Connecting small villages through a green safe and usable cycle network should be a priority for the next five years.</li> <li>• Planning authorities play an important role in driving action on climate change or exacerbating it. Together with developers, they are making extremely important and significant decisions every day which affect everyone and lock in greenhouse gas emission pathways for many years and decades.</li> <li>• All new homes and new public buildings should be built to a Zero Carbon standard regardless of size and economical reason and the local plan reviewed to make this mandatory if necessary. Other local authorities have done this already and demonstrated the additional cost to developers to be negligible.</li> <li>• The SPD could achieve some of its stated aims using existing tools and providing incentives for achieving best practice (RIBA, 2019, 2030 Challenge; LETI, 2019, Climate Emergency Design Guide, Embodied Carbon Primer, and Archetype Pages). in order to achieve the Net Zero targets.</li> <li>• We must put these measures in place in the coming months, the urgency of the climate emergency means that now is not the time for baby steps, particularly when the solutions are already at hand.</li> </ul>	<p>Comments noted. In response: Regarding the need to review the Local Plan, see response to comment <b>CLC-19</b> above. Regarding the need to consider car dependency, spatial planning is done through the Local Plan, and there are several Local Plan policies aimed at delivering sustainable development, including Policy GROWTH 2: Locational strategy; Policy GROWTH 4: Delivery of growth; and Policy COM 7: Transport impact. Regarding the cycle network, please refer to the Council's <a href="#">Environment Plan</a>.</p>	No change to SPD
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CLC-21	Extinction Rebellion Ely Object	This document is very much Business as Usual for the Tory controlled administration of East Cambs District Council, it lacks vision, it lacks ambition, it lacks imagination, it adds very little new material to pre-existing documentation and will certainly not help ECDC reach its stated carbon neutral target by 2050, which in itself is 20 years too late.	Comments noted. Unfortunately, national policy and legislation means the scope of this document is limited to building upon the content of the existing Local Plan- it cannot introduce new policy 'burdens' on developers or set new standards or criteria.  The issue of carbon emission targets is a matter subject to consideration of the Operational Services Committee.	No change to SPD
CLC-22	Extinction Rebellion Ely Section 1 Object	In the introduction it would probably be a good idea to explain the difference between a SPD and a PDP and how they sit with the local plan and NPPF and NPPG, instead of leaving this to later sections, by which time it has all got very confused.	Agreed.	Former paragraphs 3.9 to 3.11 moved to after paragraph 1.9
CLC-23	Extinction Rebellion Ely Para 1.5 Object	Why should the council make "special efforts to seek the views of key relevant bodies and organisations, as well as developers and agents on the Council's 'agent's forum'"? Who is a member of the agents forum? I can find no list on the ECDC web site. When consulting with people or organisations that have a vested interest in maintaining the status quo, such as developers and agents, their comments will be fairly predictably against introducing measures beneficial to the local environment and ecosystems if it looks like causing them more work. Therefore, comments from people or organisations with vested interests should have a weighting factor applied to them.	All comments received, whether from environment based lobby groups or developer interests, are treated equally and fairly. No organisation or individual is treated with greater or lesser weight.  All organisations and individuals on our planning policy consultation database were consulted, and anyone can be added to that database.	No change to SPD
CLC-24	Extinction Rebellion Ely Para 2.2 Object	Section 2.2 references the UN IPCC SR15 report, issued October 2018, but fails to mention that this report said we only have 10 to 12 years remaining to take significant action if we are to prevent catastrophic climate collapse and runaway global heating that was 2 years ago so now we only have 8 to 10 years left, this doesn't sit very	Comments noted  The issue of carbon emission targets is a matter subject to consideration of the Operational Services Committee.	No change to SPD

		comfortably with ECDC climate emergency declaration date of 2050 does it?		
CLC-25	Extinction Rebellion Ely Para 2.3 Object	Section 2.3 delete words, “if, as some suspect” there is no question that peat drying out releases CO2 into the atmosphere this is just basic science and doesn't actually need investigation by the combined authority	Agreed, in terms of removing that phrase (though the retention of the word ‘if’ is required)  However, the investigations being made by the CA relates to the degree of carbon remaining in the peat soils, and the best ways to preserve what is remaining (and reverse losses). This is critical research.	Words ‘, as some suspect’ deleted
CLC-26	Extinction Rebellion Ely Para 2.4 Object	Section 2.4 not sure what the point trying to be made here is, ok there are large scale solar farms in the district (some would argue too many especially when they're on prime “blacktop” agricultural land) but what we don't have is any on-shore wind, the carbon footprint of onshore wind is 2/3 that of solar farms and doesn't prevent the land being used productively for food growing.	Comment noted.	No change to SPD
CLC-27	Extinction Rebellion Ely Para 2.5 Object	Section 2.5 suggested Cambridgeshire and East Cambs are growing areas. What is the evidence base for this? I can find none, other than unsubstantiated statements by the local authorities resulting from central government mandates, again unsubstantiated. This requirement for growth needs to be urgently reassessed in the light of, 1. “Brexit” 2. The pandemic and 3. Climate Collapse and the resulting large sea level rises which will inundate most of the district. There also seems to be an assumption that growth will have adverse impact on the climate, this isn't necessarily true and indeed isn't this the whole point of this SPD to ensure that we can have some “sustainable growth” without negatively impacting the climate! Local authority responsibility should also extend to outsourced operations like “Street Works” and “Palace Homes”. Palace Homes in particular should come under the umbrella of the ECDC climate emergency declaration and climate change strategy. As suggested by this section.	Comments noted. In response, the level of growth for East Cambridgeshire is set by national policy, based on ONS forecasts, affordability and national ambitions relating to house building.  It is agreed that growth can have a positive effect on the environment.  The Council already incorporate emissions arising from its contracted out services, in line with national and international accounting Greenhouse Gas Protocols – see the Council’s Environment Plan of June 2020.	No change to SPD

			Palace Green Homes is treated differently because it is not a 'contracted out' service as such (unlike, say, waste collection).	
CLC-28	Extinction Rebellion Ely Para 3.3 Object	Section 3.3 extracts from the NPPF; all of the cited extracts form an excellent framework for a low carbon future, unfortunately there seems to be no evidence of ECDC planning policy in any way following the guidance given in the NPPF 2019, why is this guidance not being followed?	Unfortunately, the scope of the Climate Change SPD is limited, given that it can only add further detail to the policies in the Development Plan, and cannot add additional burden or new or revised policy criteria. We appreciate that the Local Plan (2015) was prepared before the latest NPPF revisions. While the Local Plan remains the starting point for decision making, where the plan is absent, silent or relevant policies are out of date, decisions are taken after an assessment against the policies in the NPPF taken as a whole. Thus, the NPPF is being followed already.	No change to SPD
CLC-29	Extinction Rebellion Ely Para 3.4 Object	Section 3.4 extracts from NPPG; there would not seem to be any evidence of ECDC adopting any of the guidance set out in this national policy, why not?	See response to <b>CLC-28</b> above.	No change to SPD
CLC-30	Extinction Rebellion Ely Para 3.7 Object	Section 3.7 the NPPG defines what local planning authorities can do in terms of exceeding Energy Performance standards. The first bullet refers to "level 4 of the Code for Sustainable Homes". This code was withdrawn in April 2015 and hasn't been replaced with an equivalent standard, can we then say that this SPG will enable energy performance standards for new housing (or adaptation of buildings for dwellings) to set a standard of Passivhaus in view of there being no equivalent UK standard? Or BREEAM standard "excellent"? In the absence of a formal standard this SPD would be an ideal opportunity	Any standards (or 'burdens') above national policy or legislation can only be set in a Local Plan. Unfortunately, the scope of the Climate Change SPD is limited, given that it can only add further detail to the policies in the Development Plan, and cannot add additional burden or new or revised policy criteria.	Adjust supporting text before Policy CC1, and slightly adjust Policy CC1 itself, so as to be clear



		for ECDC to really take some initiative and set its own. Remember NPPG is guidance, ECDC can choose to apply higher standards if the political will and ambition exists.	<p>The current Local Plan already seeks the equivalence of Code for Sustainable Homes Level 4, so is consistent with the maximum permitted by national policy and guidance. The SPD can not go further. Passivhaus standard is not equivalent to Code Level 4, and therefore is not a reasonable substitute (in terms of compliance with national policy and guidance).</p> <p>However, on reflection, we think the supporting text of Policy CC1 could be clearer in terms of latest national position in terms of code for sustainable homes, as well as slight re-wording of the policy itself. We also think the policy could usefully encourage passivhaus standards.</p>	<p>in respect of requirement in relation to Code 4 of sustainable homes.</p> <p>Policy also boosted by encouraging passivhaus standard</p>
CLC-31	Extinction Rebellion Ely Para 3.8 Observation	Section 3.8 may mean something to local authority planners but means little or nothing to anybody else. I don't understand or recognise the difference between an SPD and a DPD, this is pointless and deliberately confusing jargon.	<p>It is agreed that the planning framework of England is complicated and confusing, though the SPD attempts to explain some of the differences the best it can. Government intends to simplify the system, via the recent Planning White Paper. In the meantime, further clarity on terminology can be found in the NPPF glossary.</p>	Section 1 (and elsewhere) redrafted to help explain the difference between the types of policy documents.
CLC-32	Extinction Rebellion Ely Para 3.9	Section 3.9 explain the use of the term "burden"?	In this context, the term 'burden' is used to mean a requirement that will have financial, time or resource implications for those applying for or	No change to SPD

	Observation		<p>implementing a planning permission. It comes from NPPG advice (61-008-20190315), as follows:</p> <p>“Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial <u>burdens</u> on development.”</p>	
CLC-33	Extinction Rebellion Ely Para 3.10 Object	Section 3.10 What is the point of this section? Not only is it gibberish it is also not true. On 3 <sup>rd</sup> March 2020 BEIS announced it's renewed support for onshore wind development.	<p>While the Department for Business, Energy and Industrial Strategy (BEIS) announced that it will allow onshore wind projects to compete for subsidy support, National Planning Policy (which falls under MHCLG Department) still places significant restriction on the development of wind turbines.</p> <p>National policy states (NPPF para 154, footnote): <i>Except for applications for the repowering of existing wind turbines, a proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local</i></p>	No change to SPD

			<i>community have been fully addressed and the proposal has their backing.</i> As an SPD, this plan cannot allocate sites for wind turbine development. As there are no sites allocated for wind turbines in the current Local Plan (2015), and to date no Neighbourhood Plan identifies any sites for wind turbine development, no wind turbine proposal can be given planning permission in the District. Para 3.10 (now moved to 1.10) is, therefore, accurate.	
CLC-34	Extinction Rebellion Ely Paras 3.9-3.11 Object	Sections 3.9, 3.10 and 3.11 go to some lengths to explain that this SPD is actually pointless because it can't change anything that isn't already in the local plan (the latest version of which was rejected and the existing default version is 2015) this is a massive cop-out, so this document is saying that this document is a pointless waste of time?! Once again ECDC kicking the climate can down the road.	While the SPD is indeed restricted in what it can achieve, it is hoped that, by building upon the Environment and Climate Change section of the Local Plan, the SPD will assist applicants and decision makers in delivering the requirements set out in the Local Plan.	No change to SPD
CLC-35	Extinction Rebellion Ely Para 3.12 Object	Section 3.12 refers to the 2015 local plan, this local plan is out of date, it refers to biofuels and biomass as "renewable sources" they are not and are in many cases more carbon intensive than burning conventional fossil fuels.	The SPD cannot amend the Local Plan.	No change to SPD
CLC-36	Extinction Rebellion Ely Para 3.16 Object	Section 3.16: ok so sections 3.8 through to 3.11 tell us all of the things that an SPD can't do but a DPD can and that a DPD is part of the local plan only to then go on to say that this SPD will predominantly focus on providing additional guidance for the implementation of ENV4 in the local plan. This makes no sense whatsoever, perhaps we actually need a DPD to support ENV4 in the local plan?	A new Local Plan (or, to give its other legal name, a DPD) could attempt to go further than the present (2015) Local Plan. However, the Council has determined that a comprehensive new Local Plan is not likely to commence preparation until clarity on the Planning White Paper (and the separate Environment Bill and Energy Strategy white paper) has emerged. In the meantime, this Climate Change SPD intends to act as a temporary	No change to SPD

			bridge between the policies of the 2015 Local Plan and that future Local Plan.	
CLC-37	Extinction Rebellion Ely Para 4.1 Object	Section 4.1 states that local plan policy ENV4 sets out requirements for new developments over the threshold of 5 dwellings. No it doesn't, it begins by saying all proposals for new development without any number constraint. Why is there a number constraint anyway? The number constraint should be removed. All development should be carbon neutral as built now – this is the only way the ECDC can meet it's declared zero carbon date of 2050.	It is agreed that the opening paragraphs at 4.1 are not entirely reflective of Policy ENV4, and need correcting. The threshold of 5 dwellings is included in Policy ENV4, but only in relation to the code for sustainable homes. It is agreed that 'all development' is covered by other parts of ENV4, and therefore the reference to 5 dwellings in the supporting text needs clarifying.  The SPD can not amend the Local Plan threshold.	Para 4.1-4.2 corrected
CLC-38	Extinction Rebellion Ely CC1 Object	Section 4.2 The re-written CC1 is below: Policy ENV4 states: <i>All proposals for new development should aim for reduced or zero carbon development in accordance with the zero carbon hierarchy: first maximising energy efficiency and then incorporating renewable or low carbon energy sources on-site as far as practicable.</i> And: <i>Applicants will be required to demonstrate that they have maximised all aspects of sustainable design and construction...</i> In order to demonstrate how this policy requirement is met, a <b>Sustainability Statement</b> will be submitted as part of the Design and Access Statement. The Sustainability Statement will detail the applicant's approach to meeting the Passivhaus standard or meeting or exceeding BREEAM "Outstanding" standard. Planning permission will not be considered if a Sustainability Statement is not submitted. <b>Low and zero carbon energy networks</b> Developers are encouraged to incorporate renewable / low carbon energy generation provision onsite, or connect into an existing nearby	Unfortunately, the scope of the Climate Change SPD is limited, given that it can only add further detail to the policies in the Development Plan, and cannot add new or revised policy criteria. The suggested text cannot, lawfully, be incorporated in the SPD.	No change to SPD

		<p>renewable, low or zero carbon energy generation network where they exist.</p> <p><b>Combined heat and power (CHP) – District Heating Scheme</b>  In the case of large-scale residential development and non-residential developments of 1000m sq or more, developers must consider the use of a District Heating Scheme, possibly Combined Heat and Power (CHP) generation, where the CHP system uses truly renewable sustainable energy sources or a network connection to an existing renewable CHP facility. However, the use of other technologies- for example solar photovoltaics or thermal systems, wind turbines, biomass heating, ground or air source heating (in place of a district heating scheme) – are also encouraged and may provide a better solution on a case by case basis.</p>		
CLC-39	<p>Extinction Rebellion Ely CC2</p> <p>Object</p>	<p>Section 5.4 The re-written CC2 is below:  CC2: Reducing energy demand in existing buildings  For all development proposals which involve the change of use of a building, or an extension to an existing building, the applicant should take every opportunity to improve the energy efficiency of the entire building (including the original building, if being extended)*.  Proposals which do not consider and take such viable opportunities will, in principle, not be supported.  The new build part of any extended building will need to meet the same energy efficiency standards as detailed in CC1 above.  The pre-existing part of an extended building should have it's energy efficiency up-lifted to "best achievable" for it's given age and build type. If the extension is 50% or greater of the pre-existing building then all "thermal elements" of the pre-existing building must meet the same efficiency as the new extension. (This statement is contained within Part L of the building regulations so is already a legal requirement)  In particular, residential properties which, following an extension or conversion, will achieve an improved EPC rating overall will, in principle, be supported. In this instance, a pre-development EPC should be provided as part of the application, together with evidence as to how a completed development EPC is likely to be rated.  <i>*Note: for any heritage asset, any improvements to the energy efficiency of that asset must not cause harm to, or loss of, the</i></p>	<p>See response to <b>CLC-38</b> above.</p> <p>There is also no need to repeat anything set out in mandated Building Regulations.</p>	<p>No change to SPD</p>

		<i>significance of the asset. This may limit any feasible energy efficiency improvements.</i>		
CLC-40	Extinction Rebellion Ely Section 6 Observation	Section 6 seems generally to be a good thing, however, Section 6. 2 apparently suggests that properties built today are neither built to last nor fit for purpose! Surely not? It seems implicit in this section that properties should be built to the specifications contained within the rewritten CC1 above.	6.2 does not mean to imply that buildings are not built to last nor fit for purpose: rather, it highlights the importance of considering adaptability.	No change to SPD
CLC-41	Extinction Rebellion Ely CC3 Observation	Comments on CC3 talks about heat resilience. This is true, whilst at the same time the orientation of buildings should be done to maximise solar gain, thus reduce the need to heat from external sources, so solar gain versus solar shading needs to be carefully managed.	Comment noted, and agreed, and worthy of emphasising this point more in the SPD.	Additional point added to policy CC3, and second bullet amended to refer to excessive sunlight (in terms of where shading may be required)
CLC-42	Extinction Rebellion Ely CC3 Object	Comments on CC3 talks about adaptable design. The design and construction of all properties in the district should be to the specifications given in the rewritten CC1 above i.e. carbon neutral at build time. This is quite easily achievable using standard widely available building materials and techniques, it is not rocket science. To suggest a property is constructed today which is not carbon neutral at build time and will need subsequent adaptation is ludicrous. Anyone with any experience in the building and Allied trades knows that retrofitting to achieve carbon neutrality is difficult, expensive and rarely achievable. What is the point in building anything now that cannot meet ECDCs 2050 carbon neutrality stated objective?	Unfortunately, the scope of the Climate Change SPD is limited, given that it can only add further detail to the policies in the Development Plan, and cannot add a new burden or new or revised policy criteria.	No change to SPD
CLC-43	House Builders Federation	Thank you for consulting the Home Builders Federation (HBF) on the above supplementary planning document (SPD). The HBF is the principal representative body of the housebuilding industry in England	Comments noted	No change to SPD

	Observation	and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.		
CLC-44	House Builders Federation Object	Our key concern with the SPD is that the Council are clearly seeking to introduce policies that were to be included in the local plan that was withdrawn by the Council. This is a wholly inappropriate, and unlawful, approach to the development and adoption of local planning policies. The relevant regulations are clear that SPDs cannot be used to introduce statements that are intended to guide the determination of planning applications. They are intended to provide guidance and clarity to those applying for planning permission rather than create additional burdens and confusion. If the Council wishes to introduce new policies, it should prepare a new local plan. Only through the legally required processes of preparing a local plan can new policies be scrutinised and examined effectively to ensure they are sound. Before considering our specific concerns with the SPD we have set out, for the benefit of the Council, the legal framework relating to what is considered to be a policy and the distinction between the local plan and supplementary guidance.	Disagree that SPDs cannot be used to guide the determination of planning applications. NPPG explicitly states: <b>“What is the role of supplementary planning documents?”</b> ....They are...a material consideration in decision-making.” Ref: 61-008-20190315  By definition, if they are a material consideration, then they can guide the determination of planning applications (though it is accepted that SPDs are highly unlikely to be the determining or most important document to reach a decision – they can only be a ‘material consideration’, post consideration of Local Plan policies).  The Council is well aware of the legal framework of plan making, including SPDs, and respectfully points the HBF to Reg 8(3) of the The Town and Country Planning (Local Planning) (England) Regulations 2012 which states: “Any policies contained in a supplementary planning document must not conflict with the adopted development plan”  The above therefore establishes that SPDs can include ‘policies’ but that	Adjustments made where any doubt arises from what is ‘required’ and what is ‘encouraged’.

			<p>such policies must not conflict with those in a Local Plan. National policy explains a little more what is meant by 'conflict' and refers to matters such as 'burdens'.</p> <p>The SPD, therefore, intends to build upon policies in the adopted Local Plan. The SPD does not set out additional requirements, but rather sets out, for example, how applicants <i>could</i> demonstrate that their proposal meet the requirements of the Local Plan policies.</p> <p>Where the SPD introduces something new, or additional to, the Local Plan, it does so only by 'encouraging' such matters, rather than 'requiring' them. In doing so, it is entirely consistent with national law and policy. However, a thorough review of the draft SPD has been done, and if there was any doubt on this clarity, then some adjusted wording has been included.</p> <p>More generally, it is disappointing, when reading the representations as a whole from the body representing builders of 80% of all homes built in England, that no constructive positive changes to the SPD are offered, or even acknowledgement that house builders have a vital role at mitigating climate change and building homes that are capable of adapting to it. Instead only representations are offered seeking the council to, in</p>	
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			effect, abandon the SPD (or dilute it to be of no consequence).	
CLC-45	House Builders Federation General Object	<p>The relevant legislation defining the difference between Local Plans and SPDs is the Town and Country Planning Regulations (2012). This defines an SPD in regulation 2 as “any document of a description referred to in regulation 5 (except and adopted policies map or statement of community involvement) which is not a local plan.”</p> <p>Therefore, it can be concluded, as stated above, that whilst SPDs are Local Development Documents they are not local plans. It is also important to note that regulation 2 defines the local plan as: “any document of the description referred to in regulation 5(1)(a)(i), (ii) or (iv) or 5(2)(a) or (b), and for the purposes of section 17(7)(a) of the Act these documents are prescribed as development plan document”</p> <p>Regulation 5 in turn states: 5(1) For the purposes of section 17(7)(za)(1) of the Act the documents which are to be prepared as local development documents are— (a)any document prepared by a local planning authority individually or in cooperation with one or more other local planning authorities, which contains statements regarding one or more of the following— (i)the development and use of land which the local planning authority wish to encourage during any specified period; (ii)the allocation of sites for a particular type of development or use; (iii)any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i); and (iv)development management and site allocation policies, which are intended to guide the determination of applications for planning permission;</p> <p>Taken together these regulations mean that a local plan is a document that contains statements as to the:</p> <ul style="list-style-type: none"> <li>• development and use of land which the local planning authority wish to encourage during any specified period;</li> <li>• allocation of sites for a particular type of development or use; and</li> <li>• development management and site allocation policies, which are intended to guide the determination of applications for planning permission.</li> </ul> <p>Therefore, any element of the SPD considered to be development management policies which are intended to guide the determination of</p>	See response <b>CLC-44</b> above	See change above

		<p>applications for planning permission should be deleted. Such policies can only be adopted in a local plan following the prescribed process and their adoption through SPD without the need for examination in public is wholly inappropriate. This issue was explored in detail in the recent High Court Judgement between William Davis Ltd, Bloor Homes Ltd, Jelson Homes Ltd, Davidson Homes Ltd &amp; Barwood Homes Ltd and Charnwood Borough Council. In this case Justice Gilbart quashed the SPD on the grounds that it contained policies that should have been contained in the local plan because they could be considered to fall under regulation 5(1)(a)(i) and 5(1)(a)(iv). However, this important legal distinction between the local plan and supplementary guidance, and their respective roles, does not seem to have been fully recognised by the Council as it has included policies from the local plan in the SPD, such as those set out in CC3. This must be rectified prior to adoption through the deletion of these policies. We would also suggest that more detail is provided as to the legal status of an SPD in planning policy. At present the Council state they are a material consideration but fail to clearly outline their legal status as guidance and not policy. This would ensure that decision makers and the general public are clear as to the role of the SPD.</p>		
CLC-46	House Builders Federation CC1 Object	<p>The Council must be clearer as to the policy framework surrounding the optional technical standards and the Code for Sustainable Homes (CSH). Firstly, the Council must state that they cannot require the lower water consumption standard mentioned in part d. We recognise that the Council are suggesting that the developer could outline in their sustainability statement whether they are voluntarily applying the higher standard but it is important that the full picture regarding the optional technical standards is noted to ensure that decision makers do not seek to require this standard. The SPD must clearly state that this is an optional technical standard and can only be adopted through the local plan. Secondly, the Council must refer to the Written Ministerial Statement from May 2015 which outlines that the only elements of the CSH that should be applied relate to energy performance standards. At present the SPD makes no reference to this distinction and as such could lead to unnecessary confusion and poor decision making.</p>	<p>ECDC feel that the wording of the guidance is clear that delivering lower water consumption is voluntary. The specific wording is ‘...the design intends to voluntarily incorporate...’. Comments noted in relation to Code for Sustainable Homes, and some word changes to add clarity on this matter.</p>	<p>Section 4 paragraphs and Policy amended to provide clarity on Code for Sustainable Homes.</p>

CLC-47	House Builders Federation  CC3  Object	We would consider this to be a policy as it sets out requirements for development that will be used to determine planning applications. Elements of the text of CC3 have been directly lifted from the withdrawn local plan. For example, the first paragraph under adaptable design have been taken directly from part c of policy LP22 in the withdrawn local plan. The Council have tried to link this supposed guidance to policy ENV4 in the local plan but given that this policy is entitled energy and water efficiency there would seem to be little relating it to the elements in CC3 on adaptable design and heat resilience. The Council are clearly trying to shoehorn a policy from the withdrawn local plan into the SPD and as such CC3 should be deleted.	Comments noted.  Whilst it is disappointing the body representing over 80% of all homes built in the UK appears to want to resist delivering homes which are resilient and adaptable to a changing climate (or at best, want the Council to have no policy or position on this important matter), it is accepted that this policy could benefit from a slight adjustment to clarify that the measures set out in the policy are only encouraged, rather than strict policy requirements. The Council hopes the HBF, and house builders generally, will respond positively to such encouragement.	Wording of the SPD policy CC3 has been amended, where appropriate, to make it clear where matters are only to encourage applicants to consider the various considerations listed.
CLC-48	House Builders Federation General Object	Finally, we are concerned that the general layout of the document is one that is more akin to a policy document rather than one offering guidance. This is largely due to the Council having chosen to incorporate what look like policies within the SPD. Whilst these have not been labelled as policies, we are concerned that councillors making decisions at planning committees will treat them as such and expect to see them included within applications. On a similar note we are concerned that they may be seen as requirements by local residents who then object to preapplications that do not contain such provisions. SPDs should provide a useful guide to applicants and it is important that they are not seen as a policy document. At present this distinction is not sufficient within the draft SPD. Alongside a clear explanation as to the scope of such guidance, as suggested above, we would recommend that the Council refrain from using 'policy' boxes in its SPDs.	See response to <b>CLC-44</b> above.  The use of 'policies' and policy numbering in SPDs is common place and lawful, as confirmed in the plan making regulations.	See CLC-44 above
CLC-49	House Builders Federation General	It is important that a clear distinction between policy and guidance is maintained. SPDs that blur the boundaries between policy and guidance are not helpful to either applicants or decision makers. At present this SPD not only blurs the boundary between what is and is	See response to <b>CLC-44</b> above.	See response to CLC-44.

	Object	not policy it also places new requirements on development. This is wholly inappropriate. If the Council wishes to adopt new policy measures it should do so through a review of its local plan and not through SPD. As we outlined at the start of this response it is important that policies that will be used to determine planning applications are properly considered through the examination of a local plan. Only through appropriate scrutiny can it be determined that such policies are sound.		
CLC-50	Pigeon Investment Management Limited Observation	<p>Pigeon Investment Management Limited (Pigeon) is a private company operated by a board of directors and a team of professionals from the built environment who each bring considerable experience of delivering high quality schemes in the East of England. Pigeon is working with a number of landowners across East Cambridgeshire and the East of England to deliver high quality schemes ranging from larger sustainable urban extensions through to smaller sustainable residential and mixed-use schemes as well as renewable energy and associated infrastructure.</p> <p>Pigeon welcome this consultation and hope that the Council will find the comments of assistance. Comments are provided both in relation to general matters and in direct response to individual paragraphs and policies in the draft SPD. We set out below in turn our comments in relation to the consultation document</p>	Comments noted	No change to SPD
CLC-51	Pigeon Investment Management Limited Observation	<p>The Climate Change SPD seeks to set out further guidance and advice in relation to how development proposals should respond to Climate Change and which is intended to build on policies within the East Cambridgeshire Local Plan (2015) and in response to the Council's declaration of a Climate Emergency in October 2019.</p> <p>Pigeon welcome the overall intention of the document and fully appreciate the need for all to take appropriate action in response to the climate emergency. Nonetheless, it is also important that the document is focussed on aiding the interpretation of existing Local Plan policies and does not go beyond its lawful remit by creating new policies. It is important that the SPD can be clearly interpreted and practically applied without undue adverse implications for the Council's requirements in respect of housing delivery for instance and to ensure that sustainable developments can come forward in a viable and deliverable manner. Given Pigeon's involvement in helping to deliver sustainable, planned development within the District, including</p>	<p>The Council welcomes the support for the 'overall intention of the document'.</p> <p>For other matters, see response to <b>CLC-44</b> above.</p>	No change to SPD

		both new homes and renewable energy and related infrastructure we are keen to work with the Council to ensure an appropriate balance is secured and our comments should be taken in that context.		
CLC-52	Pigeon Investment Management Limited Object	A key concern is that the format of the document is one that is more akin to a policy document rather than one offering guidance. This is largely due to the Council having chosen to incorporate what look like policies within the SPD. Whilst these have not been labelled as policies, we are concerned that residents, or indeed councillors making decisions at planning committees will treat them as such and expect to see them included within applications. SPDs should provide a useful guide to applicants and it is important that they are not seen as a policy document. At present this distinction is not sufficient within the draft SPD. Alongside a clear explanation as to the scope of such guidance, as suggested above, we would recommend that the Council refrain from using 'policy' boxes in its SPDs. Conversely, we would suggest that the document provides practical examples of how the requirements of Policy ENV4 can be met and examples of best practice which are encouraged.	See response to <b>CLC-44</b> above.	See response to CLC-44
CLC-53	Pigeon Investment Management Limited Object	We also have concerns that the draft SPD is seeking to introduce policies that go beyond the remit of policies within the Adopted Local Plan and which in some cases were to be included in the local plan that was withdrawn by the Council. This is an inappropriate, and unlawful, approach. The relevant regulations are clear that SPDs cannot be used to introduce statements that are intended to guide the determination of planning applications. They are intended to provide guidance and clarity to those applying for planning permission rather than create additional burdens and confusion. However, this important legal distinction between the local plan and supplementary guidance, and their respective roles, does not seem to have been fully recognised within the SPD as it has included policies from the withdrawn local plan in the SPD, such as those set out in draft Policy CC3. This should be rectified prior to adoption through the deletion of these policies. Indeed, given that the Adopted Local Plan is more than five years old and the inability of the SPD to introduce new policies to reflect the latest guidance and regulations, it is considered that the Council should prepare a full new local plan. This would ensure that the Council would be able to fully respond to its declaration of a Climate Emergency through a comprehensive	See response to <b>CLC-44</b> above.  In terms of a new Local Plan, see response at <b>CLC-19</b>	See response to CLC-44.

		approach towards planning for and managing sustainable growth. Only through the legally required processes of preparing a local plan can new policies be scrutinised and examined effectively to ensure they are sound.		
CLC-54	Pigeon Investment Management Limited Para 1.3 Object	As noted above, we have general concerns with the document incorporating new 'policies' as opposed to setting out guidance to aid interpretation of existing local plan policies. Notwithstanding these concerns we set out our detailed comments in respect of individual policies and paragraphs within the draft document in turn below. Paragraph 1.3 – We note the comments in respect of the purpose of the SPD. For the reasons set out above, further explanation should be provided in respect of the purpose of the SPD and the scope of the guidance. The relationship with other SPDs which also have a bearing on the Council's response to Climate Change, such as the Natural Environment DPD should also be acknowledged.	See response to <b>CLC-44</b> above. Paragraphs 3.18 to 3.22 outline the other SPDs relevant to climate change and paragraph 3.17 briefly explains the relationship with the other SPDs.	See response to CLC-44. No further change to SPD.
CLC-55	Pigeon Investment Management Limited Para 1.7 Object	Paragraph 1.7 - The text should also acknowledge the need for the SPD to be reviewed regularly in order to ensure that the guidance takes account of, for example, new Government initiatives and legislative changes being brought forward, for instance through the Future Homes Standard. Paragraph 1.8 – Bearing in mind our comments above, we would also suggest that more detail is provided as to the legal status of an SPD in planning policy. At present the Council state they are a material consideration but fail to clearly outline their legal status as guidance and not policy. This would ensure that decision makers and the general public are clear as to the role of the SPD.	Agreed, in respect of para 1.7.  As for comments in respect of para 1.8, the council agrees some slight rewording is beneficial, for clarity.	Paragraph 1.7 amended to include reference for the need to keep SPDs under review. Para 1.8 also slightly adjusted, for clarity on status and decision taking.
CLC-56	Pigeon Investment Management Limited Para 2.5 Object	Paragraph 2.5 – We note the comments in respect of the growth of the District and the increasing need for new homes, businesses and other supporting infrastructure. We fully agree with this observation. However, it is for this reason that the Council should undertake a full review of the Local Plan in order to ensure that sustainable growth can be achieved through an up-to-date and integrated suite of policies. Much has changed since the adoption of the Local Plan in 2015 and it	In terms of a new Local Plan, see response at <b>CLC-19</b>	No change to SPD

		is important that the Council has an up-to-date Local Plan in order to balance the need for growth with the growing pressures from climate change. This will ensure that growth can be accommodated in the most sustainable way.		
CLC-57	Pigeon Investment Management Limited Para 3.8-3.11 Object	Paragraph 3.8-3.11 – We note and agree with the comments in relation to the limited scope of the SPD given that it is not lawfully able to provide new policies. As noted above, despite this commentary it is considered that the draft SPD does not fully reflect this position as currently drafted and that the format of the SPD should be changed to focus more on explanation and guidance including practical examples to support the interpretation of the relevant policies within the Adopted Local Plan and relationship with other SPDs.	See response to <b>CLC-44</b> above.	See response to CLC-44
CLC-58	Pigeon Investment Management Limited CC1 Object	<p>Notwithstanding our reservations with regard to the incorporation of policies within the document, Pigeon support the general thrust of this Policy and welcome the flexibility provided, including the clear distinction that is drawn in terms of the approach towards outline and detailed planning applications.</p> <p>However, given that National Policy has moved on since the adoption of the Local Plan, the draft SPD should be clearer as to how the requirements of Policy EN4 should be interpreted in the context of the optional technical standards and the Code for Sustainable Homes (CSH). Firstly, the Policy should state that they cannot require the lower water consumption standard mentioned in part d. We recognise that the Council are suggesting that the developer could outline in their sustainability statement whether they are voluntarily applying the higher standard but it is important that the full picture regarding the optional technical standards is noted to ensure that decision makers do not seek to require this standard. The SPD must clearly state that this is an optional technical standard and can only be adopted through a review of the local plan.</p> <p>The Council should also refer to the Written Ministerial Statement from May 2015 which outlines that the only elements of the CSH that should be applied relate to energy performance standards. At present the SPD makes no reference to this distinction and as such could lead to unnecessary confusion and poor decision making.</p> <p>Finally, we note that the final part of the draft 'Policy' seeks to encourage the incorporation of Combined Heat and Power within larger scale residential schemes. Our understanding from the</p>	<p>General support noted and welcomed.</p> <p>Comments noted in relation to Code for Sustainable Homes.</p> <p>The guidance in section 4 does not require a Sustainability Statement, rather it states that one 'could usefully be prepared and submitted as part of the Design and Access Statement'. The guidance essentially sets out a good means of demonstrating how a proposal satisfies the requirements of Local Plan policy ENV 4, but in no way implies this is the only means of demonstrating compliance with ENV4. Items 'a' to 'g' are listed as items a Sustainability Statement <i>could</i> contain, not <i>must</i>.</p> <p>In respect of CHP comments, the consultation referred does not rule out CHP, but does acknowledge that it may not be the most effective solution in the future. CC1 wording reflects this sentiment – it explicitly says other</p>	<p>Section 4 paragraphs and Policy amended to provide clarity on Code for Sustainable Homes. CHP section also adjusted to make it clear that CHP is only an option to explore ('could' rather than 'should'), acknowledging it may not always be the best solution.</p>

		consultation on the Future Homes Standards and related background evidence is that CHP is no longer considered to be a sustainable option for heating homes and the emphasis is now being placed on the use of Ground and Air Source Heat Pumps in order to meet the forthcoming changes to Part L of the Building Regulations and the Future Homes Standard. It is considered that this requirement should therefore be changed or deleted to reflect this.	options may provide a better solution. As a slight adjustment to CC1, the text has changed to could rather than should explore CHP.	
CLC-59	Pigeon Investment Management Limited CC3 Object	We consider this to be a new policy in its own right as it sets out requirements for new development that will be used to determine planning applications. It is noted that elements of the text of CC3 have been directly lifted from the withdrawn local plan. For example, the first paragraph under adaptable design has been taken directly from Part C of policy LP22 in the withdrawn local plan. The Council has tried to link this supposed guidance to policy ENV4 in the local plan but given that this policy is entitled energy and water efficiency there would seem to be little relating it to the elements in CC3 on adaptable design and heat resilience. It appears that the Council is trying to incorporate a policy from the withdrawn local plan into the SPD. Since this policy goes beyond the requirements of the Adopted Local Plan it should be deleted.	See response at <b>CLC-47</b> .	See <b>CLC-47</b> .
CLC-60	Pigeon Investment Management Limited CC4 Object	We support the intention of the policy to ensure that new developments do not compromise any existing or approved renewable energy or low carbon energy generation facility in the District. However, it is considered that this should be expanded to include associated infrastructure. Pigeon is bringing forward a number of Battery Energy Storage Schemes across the Region including within East Cambridgeshire in order to support the expansion of renewable and low carbon technologies and manage intermittencies in energy demand and supply on the electricity network. Given the important role of renewable technologies and associated energy infrastructure in achieving net zero carbon emissions by 2050 in response to the Climate Emergency it is considered to be critical that new development does not compromise the operation of such facilities. A key consideration in this respect is noise emissions from such facilities on new residential properties subsequently approved. It is considered that this consideration should be added to the wording of the policy.	Agreed (noting that this policy is about protecting existing infrastructure, not whether or not new infrastructure should be approved)	Policy CC4 - add the words 'and/or associated infrastructure'



CLC-61	Pigeon Investment Management Limited Object	<p>Pigeon welcome this consultation and hope that the Council will find the comments of assistance. As noted above, whilst we support the general intentions behind the SPD we have a number of concerns with aspects of the document.</p> <p>In particular, it is important that a clear distinction between policy and guidance is maintained within the document. SPDs that blur the boundaries between policy and guidance are not helpful to either applicants or decision makers. At present this SPD not only blurs the boundary between what is and is not policy it also places new requirements on development. This is wholly inappropriate. If the Council wishes to adopt new policy measures it should do so through a review of its local plan and not through SPDs.</p> <p>I trust that you will find our comments, which have been provided in the interests of facilitating the delivery of sustainable development, of assistance in moving forward towards adoption of this important SPD. Pigeon are more than happy to give any assistance in clarifying or expanding on any comments made in the above text and attached documents and would be happy to attend a workshop with various stakeholders to discuss aspects of the document and practical examples if this would be of assistance in discussing and finalising matters.</p>	Comments noted (matters raised dealt with in other responses to this consultee)	No change to the SPD
CLC-62	Historic England Observation	<p>Thank you for consulting us on your Draft Climate Change Supplementary Planning Document. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. Therefore, we welcome the opportunity to comment on the draft document. These comments have been formed in line with the NPPF (2019), which sets out the need for heritage assets to be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.</p>	Comments noted	No change to SPD
CLC-63	Historic England Support	<p>The purpose of an SPD is to provide guidance on the application of adopted policy, and it is important to ensure that the implication of this important policy document does not adversely affect or undermine the historic, physical and social value of the historic environment. Historic England recognises the clear benefits of producing an SPD for this topic area.</p>	Comments noted	No change to SPD

		We understand that the purpose of this SPD is to support the implementation of District Plan policies by providing technical guidance on Climate Change, sustainable design and construction to improve the environmental sustainability of new development. We note and welcome the reference to historic buildings and conservation areas in policy ENV4 on page 6. Likewise, we welcome the reference to heritage assets and key views in policy ENV6 Renewable energy development on page 6.		
CLC-64	Historic England Para 3.18 Support	We welcome the reference to heritage assets in paragraph 3.18 regarding commercial scale renewable developments on page 7.	Comments noted	No change to SPD
CLC-65	Historic England Para 3.22 Support	We welcome the inclusion of the extract for the Design Guide SPD, in particular the section on Renewables and the Historic Environment on page 8. We also welcome the reference to historic views in relation to small scale renewables on page 8. We note the reference to heritage assets in respect of large wind turbines on page 9.	Comments noted	No change to SPD
CLC-66	Historic England CC2 Support	We welcome the reference to heritage assets in the footnote of Policy CC2 on page 12.	Comments noted	No change to SPD
CLC-67	Historic England Object	Whilst we are pleased to see various references to the historic environment in this SPD, we consider that the SPD does not go far enough in addressing the risks posed to the historic environment. Climate Change can have a range of direct impacts on the historic environment, for example; accelerated weathering to historic fabric, erosion of archaeological sites through severe weather and harm to historic landscapes or changes in vegetation patterns. Equally Climate Change mitigation and adaptation responses can also have unwelcome impacts on the historic environment, such as damage to historic fabric through poorly designed energy-saving measures. A sustainable approach should secure a balance between the benefits that such development delivers and the environmental costs it incurs. Paragraph 007 of the Planning Practice Guidance for Renewable and low carbon energy, states that “great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting”. The SPD should therefore seek to limit and mitigate any	Comments noted. The Local Plan and national planning policy will be used to make decisions on planning applications: both local and national policy contain extensive policy on the protection, development and enhancement of the historic environment.	No change to SPD

		such damage to the historic environment. Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance.		
CLC-68	Historic England Object	<p>Historic Buildings and Energy Efficiency</p> <p>When considering energy efficiency measures the benefits of alternative options should be weighed carefully against the impact upon historic building, their character and their setting, this should be mentioned in the SPD. Significant energy savings can be achieved in historic buildings without implementing damaging alterations but the SPD does not make this clear. Small scale changes can result in improved performance, for example; altering how a building is used, improving maintenance, repairing or refurbishing existing historic windows and doors, installing secondary glazing, upgrading lighting, improving thermostat controls and boilers etc.</p> <p>A balanced well-informed approach is essential to upgrading historic buildings to reduce energy consumption. The SPD should set out the need for current environmental performance to be analysed in the first instance in order to support proposals. It is also critical that any proposals are based on a sound understanding of the pathology and construction of the existing building so that measures best suited to individual buildings and households (which take human behaviour into consideration as well as the building envelope and services) can be identified. Once analysis has been undertaken a graduated approach is recommended, beginning with management of the buildings and non-invasive measures before moving on to physical interventions.</p> <p>We would advise that the SPD makes reference to the need to understand historic fabric and make clear that standardised approaches or products may not always be suitable both in terms of the impact upon the significance of a historic building, and in perpetuating or worsening energy inefficiencies as a result of inappropriate retrofits. Energy efficiency measures can have the opposite effect if inappropriately applied to historic buildings, for example, thermal bridging can become an issue when insulating older buildings. When it occurs it is likely to increase levels of condensation and the overall thermal performance of the building is reduced. In a building where there is little insulation, the condensation is spread</p>	<p>Comments noted, and are not disagreed with, but would be an excessive and too specific a contribution to what is intended to be a short and specific SPD.</p> <p>Also, the Local Plan and national planning policy will be used to make decisions on planning applications: both local and national policy contain extensive policy on the protection, development and enhancement of the historic environment.</p> <p>Unfortunately, as a Supplementary Planning Document (i.e. not a DPD), the scope of this plan is limited to building upon the content of the existing Local Plan- it cannot introduce new policy standards or criteria.</p>	No change to SPD

		<p>over a large area, but the more insulation that is introduced, the more concentrated the areas of condensation will become at any thermal bridge.</p> <p>It is also important that heritage assets are not seen a constraining factor, but as a valuable aid to achieving sustainable development. For example historic buildings represent a significant investment of expended energy. Demolishing and replacing these historic structures would also require a major reinvestment of embodied energy and other resources. Therefore encouraging the reuse of existing historic buildings and spaces can help achieve sustainable development. The SPD could recognise that the beneficial re-use of existing buildings is a sustainable approach in its own right.</p>		
CLC-69	Historic England Observation	<p>In developing the SPD you may find the following Historic England guidance to be helpful in understanding the special considerations for historic buildings: <a href="https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historicbuildings/">https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historicbuildings/</a>  <a href="https://historicengland.org.uk/whats-new/statements/statement-on-climate-changeand-sustainability/">https://historicengland.org.uk/whats-new/statements/statement-on-climate-changeand-sustainability/</a>  <a href="https://historicengland.org.uk/whats-new/statements/modifying-historic-windows-aspart-of-retrofitting-energy-saving-measures/">https://historicengland.org.uk/whats-new/statements/modifying-historic-windows-aspart-of-retrofitting-energy-saving-measures/</a></p>	Comments noted	No change to SPD
CLC-70	Historic England Observation	<p>We look forward to engaging with you as this SPD is progressed over the coming months. Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that these would have an adverse impact upon the historic environment.</p>	Comments noted	No change to SPD
CLC-71	Persimmon Homes East Midlands Object	<p>This response relates to the consultation on the draft Climate Change (SPD) that will build upon the 'Environment and Climate Change' section of the Local Plan (April 2015). Our understanding of the document is that it intends to provide clarity and detail to inform developers on adaptations regarding climate change that will assist in gaining their support through planning stages.</p> <p>As you know, Persimmon Homes are one of the largest developers of new housing within the Cambridgeshire region, delivering hundreds of news homes every year. Even with the circumstances that every</p>	<p>Recognition of the importance of the issue is welcomed.</p> <p>Wider comments noted. See response to <b>CLC-44</b></p>	See response to CLC-44

	<p>business finds themselves in; Persimmon have continued delivering high quality new housing, helping the region meet their housing needs. Persimmon therefore have a high interest in design guides such as this as it can affect our ability to meet this need and deliver housing. Persimmon Homes support the need for sustainable development. We will work with East Cambridgeshire District Council to ensure of this and we would expect this collaboration to be recognised within the document as an overarching theme.</p> <p>In the context of the above, Persimmon Homes recognises that the authority has identified a climate change emergency and both understands the importance of this, alongside the authority's objective to take action. As such, Persimmon Homes is keen to work with the authority on achieving its aspirations. However, the authority must also acknowledge that Persimmon Homes is also engaged with the Government on the wider climate change agenda and the need for energy efficient homes. As such it is in discussion with the Government on how to implement the Governments climate change targets and agenda for energy efficient homes, both for new and existing stock.</p> <p>An important consideration to this is how the Government's agenda is progressing through the changes to building regulations and the proposals for the introduction of the Future Homes Standard. Both of these significantly raise the agenda for energy efficiency and sustainable living and as a company we are driving to meet this agenda.</p> <p>However, it has to be understood that meeting this agenda requires a combined effort from all parties to be willing to work together to meet the wider aspirations of this important topic.</p> <p>As such, Persimmon Homes is fully committed to meeting the increased energy efficiency requirements arising from the Government's agenda, and indeed is working on innovative methods of construction and supply chains to meet this. However, it has to be acknowledged that without a coordinated and common approach adopted to solve this matter both the objective of it, and housing supply for districts will be affected. It is for this reason that it is important that policies that affect both housing supply and in particular the viability of developments are pursued through Local Plans that enable the proper scrutiny of the policies alongside other policy</p>		
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		<p>burdens on development sites. As such Persimmon Homes makes this representation to open a dialogue with the authority on what are the most effective and efficient ways to work towards better energy efficiency that align with the companies interests and engagement with Government targets, alongside addressing the local climate change declaration by the authority.</p> <p>This representation will consider parts relevant to the function of our business and we will consider each relevant element. Initially, this representation will review the Climate Change SPD in general. Our principle concern with this SPD that while the authority acknowledges within the draft SPD that there are lawful boundaries of SPDs, the authority are pushing too far on what an SPD can require from applicant. It is our concern that the council is openly pursuing to establish policies that were to be admitted into the Local Plan that was withdrawn by EDCD, and as such are considered to be unlawful. We note that this is also a point being made by the Home Builders Federation.</p> <p>The regulations are transparent in that SPDs cannot introduce statements that are designed to model policies that go to the heart of the determination of planning applications where they can affect viability. They are planned to present guidance and transparency to particular groups applying for planning permission in place of creating increased worry and turbulence. A new Local Plan could/should be prepared to accommodate policies rather than through SPDs. As it can only be done through lawfully appropriate mechanisms of preparing a Local Plan. This process will be able to investigate and inspect fully whether the policies proposed are sound.</p>		
CLC-72	Persimmon Homes East Midlands Object	<p>The National Planning Policy Framework (NPPF) states at paragraph 33 that policies in Local Plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and then should be updated as necessary. This SPD is trying to introduce standards to reduce carbon dioxide and design how residential houses are built internally, and is acting beyond the legal remit of a supplementary planning document. The policies within the SPD cannot be lawfully adopted as an SPD. The Council currently does not have climate change standards, but it is built upon the 'Environment and Climate Change' section of the Local Plan (2015). Thus this SPD is expanding on existing policy,</p>	See responses to <b>CLC-44 and 45.</b>	See CLC-44 and 45

		<p>however does not have the grounds to introduce new policies. Persimmon strongly object to these policies being introduced via a supplementary planning document. To do so is plainly unlawful. The policies coming out of this SPD clearly fall within scope of Regulation 5 (1)(a)(i), (ii) and (iv) of the Town and Country Planning (Local Planning) (England) Regulations 2012 and thus can only be properly adopted as part of a development plan document (DPD). This has been tested in law and proved to be correct in one case William Davis Ltd, Bloor Homes Ltd, Jelson Homes Ltd, Davidson Homes Ltd &amp; Barwood Homes Ltd and Charnwood Borough Council. In this case Justice Gilbart quashed the SPD on the demonstration that it encompassed policies that should have been incorporated in the local plan, this is due to them being considered to be under regulation 5(1)(a)(i) and 5(1)(a)(iv).</p> <p>This position further confirms the setting of environmental standards cannot be introduced in an SPD.</p> <p>For the above reasons, the policies that the SPD are trying to introduce cannot be lawfully applied in planning decision making as it is Local Plan policy which has not gone through the appropriate process.</p> <p>Notwithstanding the above, please see below Persimmon Homes East Midlands comments on the content of the SPD.</p>		
CLC-73	Persimmon Homes East Midlands CC1 Object	<p>In essence the council must present transparency on the policy structure encompassing the alternative technical standards and the Code for Sustainable Homes (CSH). Essentially, East Cambridgeshire District Council (ECDC) must explain that they cannot demand the lower water consumption standard mentioned in part D. The SPD (Supplementary Planning Document) must openly articulate that this a discretionary technical standard and can only be adopted through the Local Plan. Along with that, ECDC must relate to the Written Ministerial Statement from May 2015 that summaries that only the elements of the CSH that will directly assign to energy performance standards. Presently, this draft SPD makes no allusion to this division, which potentially cause avoidable complexity.</p>	<p>ECDC feel that the wording of the guidance is clear that delivering lower water consumption is voluntary. The specific wording is ‘...the design intends to voluntary incorporate...’.</p>	No change to SPD
CLC-74	Persimmon Homes East Midlands CC3	<p>This form of guidance seems to present a likeness to policies that are subsequently written in the Local Plan. As components of the text of CC3 have been taken from the withdrawn Local Plan. For illustration, the first paragraph under adaptable design have been pulled from the</p>	<p>See response to <b>CLC-47</b></p>	<p>See CLC-47</p>

	Object	Withdrawn Local Plan in part c of policy LP22. ECDC have tried to associate the guidance to Policy ENV4 in the local plan although that the policy is designated energy and water efficiency there would suggest insufficient detail in CC3 on adaptable design and heat resilience.		
CLC-75	Persimmon Homes East Midlands CC1 Object	<p>Without prejudice to the above, fundamentally the authority's SPD seeks to expand on Policy ENV4 of the adopted Local Plan, and it is this that is understood to be the parent policy of the SPD, to which it expands. However the full wording and interpretation of Policy ENV4 should be applied, alongside CC1 of the SPD which does make full reference to Policy ENV4.</p> <p>ENV 4 states very clearly states that all new proposals should aim for reduced or zero carbon development in accordance with the zero carbon hierarchy as far as practical. Policy EN4 then goes further to explain that applicants will be required to demonstrate how they have considered maximising all aspects of sustainable design and constriction as set out in the Code for Sustainable Homes (or its successor).</p> <p>The important factor here is that the policy refers to the Code for Sustainable Homes, which is no longer in play and thus the use of the Code for Sustainable Homes as a benchmark is inappropriate as the policy has been superseded by events. However, it is important to note that the text in parenthesis refers to 'or its successor'. On this basis the policy appears to have some shelf-life in it as it refers to the requirements of the successor to Code for Sustainable Homes, which for the purpose of Policy EN4 is the Government's Future Homes Standards. This the Government has committed to delivering with recent announcements coming in the week of the 16 November 2020. On this basis Policy ENV4 is therefore restricted in its remit to not go beyond the successor of the Code for Sustainable Homes, which in this case are the revisions to Part L of the Building Regulations and the Future Homes Standard as and when it is implemented.</p> <p>On this basis, Persimmon Homes is happy to entertain conversations and discussions in respect of meeting the requirements of ENV4 in application to the authority but only in the context of the true lawful remit of ENV4.</p>	<p>Comments noted.</p> <p>It is not correct, as implied by the representation, that the Code for Sustainable Homes has completely gone, because government's NPPG advice still explicitly refers to elements of it, in particular Level 4, which planning policies are permitted to align to.</p> <p>The Future Homes Standard is only at consultation stage, so is not something the council could link to in terms of policy or guidance position. Even if implemented, it is not deemed a direct replacement to the Code for Sustainable Homes (in the same way that passivhaus standard is not).</p>	Section 4 paragraphs and Policy amended to provide clarity on Code for Sustainable Homes..



CLC-76	Persimmon Homes East Midlands CC1 Object	To conclude, there should be an apparent difference amongst policy and guidance. This draft SPD seeks to go beyond not only the boundaries of what SPDs can do, but also CC1 fails to acknowledge that ENV4 is itself bound by the successor to the Code for Sustainable Homes, which is the amendments to the Building Regulations and the Future Homes Standard. If ECDC aspire to endorse new policy measures, then this should be done through a review of its local plan, and not as the hand of an SPD. As previously stated, it is crucial that policies determining planning applications should be contemplated in the examination process of the Local Plan.	Comments noted	No change to SPD
CLC-77	Natural England Observation	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England supports the Council's recognition of its role in protecting and improving the environment for future generations through preparation of a Climate Change SPD. This follows the Council's recent declaration of a climate emergency and adoption of an Environment Plan. We note that the SPD will build upon the 'Environment and Climate Change' section of the Local Plan (April 2015) and respond to national planning policy and guidance.	Comments noted	No change to SPD.
CLC-78	Natural England Object	Section 2 of the SPD acknowledges the significant contribution to greenhouse gas emissions through degradation and damage to the District's important rich peat soils as these continue to dry out and release CO2 into the atmosphere. Given the extent of the lowland peat resource across the district, and the major role this has to play in reducing and mitigating climate change, we believe this topic should be a central theme of the SPD. The document should highlight the significant contribution that protecting and enhancing the ecological network can achieve for climate change, in addition to delivering a wide range of other benefits for people and wildlife. Semi-natural habitats, and peatlands in particular, are a major carbon sequestering habitat. As indicated by IUCN peatlands are highly significant to global efforts to combat climate change, as well as wider sustainable development goals. The protection and restoration of peatlands is vital in the transition towards a low-carbon and circular economy.	Unfortunately, as a Supplementary Planning Document (i.e. not a DPD), the scope of this plan is limited to building upon the content of the existing Local Plan- it cannot introduce new policy standards or criteria.	No change to SPD
CLC-79	Natural England	We agree that growth should drive a responsibility to balance competing demands and mitigate negative impacts on the natural	See above.	No change to SPD.

	Object	environment, including for climate change, as far as reasonably possible. The SPD should recognise that protecting and increasing biodiversity and green space has an important role to play in climate change mitigation and adaptation. In our view a 'natural capital' approach is vital to the delivery of wider and more integrated benefits, for wildlife, people, climate change, the economy and society as whole. Our advice is that the SPD should make reference to the full requirements of Local Plan policy ENV 7 Biodiversity and geology and the importance of Cambridgeshire's lowland peat resource. The SPD should set out robust guidance and requirements to protect and enhance the district's ecological network, including the lowland peat resource, for the multi-functional benefits this will deliver including air quality and climate change. This should be set in the wider context of local biodiversity and GI targets, for example delivering biodiversity net gain, Double Nature across Cambridgeshire and contributing to the objectives of the Cambridgeshire Green Infrastructure Strategy.	Local Plan policy ENV 7 will be taken into consideration as necessary when determining applications. The Council's recently adopted Natural Environment SPD also covers much of these matters.  The Council also looks forward to government finalising its Environment Bill, and associated natural capital and strategy aspirations.	
CLC-80	Natural England Observation	With regard to the distribution of peat soils across East Cambridgeshire NE's 'England Peat Status GHG and C Storage' mapping can be made available by contacting our WebMap2 Team: <a href="mailto:data.services@naturalengland.org.uk">data.services@naturalengland.org.uk</a> Further useful information is likely to emerge from the recently completed Cambridgeshire Fens Lowland Peat Pilot Study. The findings and recommendations of this and other pilot studies will inform preparation of Defra's England Peat Strategy. We will update you on relevant information when it becomes available.	Comments noted	No change to SPD
CLC-81	Natural England Observation Object	Natural England's advice is that plans and strategies to address climate change should prioritise measures to halt or slow down its progress as far as possible. We therefore support the measures set out in section 4 and 5 of the document to reduce carbon dioxide emissions and energy demand. We would support guidance to encourage development to aim for reduced or zero carbon, maximising sustainable design and construction, including BREEAM 'Very Good' standard or equivalent, as far as practicable. We suggest the last two paragraphs of CC1: Reducing carbon dioxide emissions should specify that 'green energy' schemes, including CHP plants, EfW schemes, solar farms etc. will not be supported if their construction or operation has the potential for adverse effect on	Unfortunately, as a Supplementary Planning Document (i.e. not a DPD), the scope of this plan is limited to building upon the content of the existing Local Plan- it cannot introduce new policy standards or criteria.	No change to SPD

		natural carbon stores, including reliance on energy crops grown on peat soils which can be damaging.		
CLC-82	Natural England Observation	We welcome that the SPD recognises that burning of fossil fuels and transport emissions are significant additional contributors to poor air quality and climate change. We agree that green energy schemes, such as the large-scale solar farms in the district, can offset some of these emissions; however, this is subject to schemes being appropriately located to avoid impact to the natural environment. Semi-natural habitats, particularly peatlands, provide a major role in carbon sequestration and improving air quality hence their protection and enhancement should be prioritised as far as possible.	Local and national policy will still be considered in the determination of planning applications.	No change to SPD.
CLC-83	Natural England CC3 Object	We welcome recognition of the need to adapt and build-in greater resilience to the impacts of extreme weather and climate change through managing flood risk, promoting sustainable drainage systems, protecting and enhancing the green infrastructure network, the natural environment and biodiversity and through building design aiming for zero carbon. We generally support the guidance set out in CC3: Resilient and adaptable design; however, the protection and enhancement of water resources and water quality, as natural capital assets, is critical for mitigating and adapting to climate change. This could be given greater emphasis here, or elsewhere, within the SPD.	Comments noted. Protection of water resources is addressed in the Local Plan.	No change to SPD
CLC-84	Natural England CC4 Support	Guidance within CC4: Safeguarding renewable and low carbon energy sources seems appropriate.	Comments noted	No change SPD
CLC-85	Natural England Observation	Natural England's further advice on climate change is set out in Annex A to this letter. This reflects our advice in response to Cambridgeshire County Council's consultation on a draft Climate Change and Environment Strategy. You may find it helpful to refer to this Strategy and also the Review being undertaken by the Mayoral Combined Authority's Cambridgeshire and Peterborough Climate Change Commission, to assess the ways that climate change is impacting local communities and the economy and actions required to adapt to or mitigate these effects.	Comments noted	No change to SPD
CLC-86	The Woodland Trust Para 3.22	We note the statement in the SPD that you have a separate SPD on natural environment, in which the contribution of trees and green infrastructure is addressed. We would be interested in being consulted when you come to revise that SPD.	The text on page 8 is an extract from the adopted Design Guide SPD.	No change to SPD

	Observation	In the draft Climate SPD, we have just one comment, which is related to the reference on page 8 to encouraging use of “sustainable timber”. We would like to see this be a bit more specific and refer to timber which is certified as coming from sustainable sources through a recognised accreditation scheme, such as that run by the Forest Stewardship Council.		
<b>LATE COMMENT</b>				
LATE1 (Rec 9 Dec 2020)	Environment Agency East Anglia Area (West) Support	We support the policies set out in the Climate Change SPD. The SPD sets out clear guidance on climate change mitigation and adaptation.	<i>LATE – but comment noted</i>	<i>No change</i>

## Appendix A

Email

### Draft Supplementary Planning Document (SPD): Climate Change

Dear Sir/Madam

We are emailing to consult you on the above supplementary planning document (SPD) and with this email, we have enclosed a consultation notice for the SPD. There will likely only be a single consultation on the emerging SPD. Following consultation, all comments received will be considered and appropriate amendments made. The SPD is then scheduled to be adopted by the Council early-mid 2021.

The draft SPD sets out East Cambridgeshire District Council's additional guidance in respect of **climate change**, providing advice on policy requirements relating to it. The Council recognises that it has a significant role to play in protecting and improving the environment for future generations. In producing this SPD, the Council is also responding to its declaration, in 2019, of a Climate Emergency.

This SPD will build upon the 'Environment and Climate Change' section of the Local Plan (April 2015) as well as responding to National Planning Policy and guidance.

Copies of the draft SPD and Consultation Notice are available for public inspection:

- on the Council's website at: <http://www.eastcambs.gov.uk/local-development-framework/supplementary-planning-documents>

The consultation period starts on **13 October 2020** and ends on **23 November 2020**. Only comments made during this period will likely be taken into account. Any comments made after the consultation period may be discarded.

You may submit your comments either by email to [planningpolicy@eastcambs.gov.uk](mailto:planningpolicy@eastcambs.gov.uk) or send your comments via post to: Strategic Planning Team, East Cambridgeshire District Council, The Grange, Nutholt Lane, Ely, Cambs, CB7 4EE.

Please be aware all comments submitted on the SPD will likely be made available for public viewing. As part of the process, we will also be producing a Consultation Report which will include a summary of all the comments received and the Council's response to these comments.

If you have any questions or queries regarding the draft SPD consultation please contact the Strategic Planning Team on (01353) 665555 or email [planningpolicy@eastcambs.gov.uk](mailto:planningpolicy@eastcambs.gov.uk)

Kind Regards,

Richard Kay

Strategic Planning Manager

## Appendix B

### List of all Consultees

All Parish Councils in East Cambridgeshire District Council.	Ely Diocesan Board of Finance
Anglia Design LLP	Ely Tool Hire Ltd
Anglian Water Services Limited	Endurance Estates Strategic Land Ltd
Beacon Planning Ltd	Environment Agency
BGG Associates Ltd	Exning Parish Council
Bird & Tyler Associates	F.J. Pistol Holdings Ltd
Bloor Homes	Feltwell Parish Council
Bovis Homes	Fen Ditton Parish Council
Brand Associates	Fen Line Users Association
BT Openreach	Fenland District council
Camal Architects	Flagship Group
Cambridge Past, Present & Future	Flavia Estates
Cambridgeshire	Fletcher Barton
Cambridgeshire & Peterborough Combined Authority	Forest Heath District and St Edmundsbury Borough Councils
Cambridgeshire ACRE	Forest Heath District Council
Cambridgeshire and Peterborough Clinical Commissioning Group	Foundation East
Cambridgeshire City Council	FP McCann Ltd
Cambridgeshire Constabulary	Freckenham Parish Council
Cambridgeshire County Council	Freebridge Community Housing
Cambridgeshire Fire and Rescue Services	Galliford Try Plc
Cambridgeshire PCT	Gazeley Parish Council
Cambridhe Housing Group	Gladman Development Limited
CAMRA	Graham Handley Architects
CAMRA - Campaign for Real Ale	Granta Architects
Carter Jonas LLP	Greater Cambridgeshire Local Nature Partnership
Catesby Property	Green & Sons Land & Cattle
Chatteris Town Council	Hanson UK
Chorus Homes	Hastoe Housing Association
City of Ely Council	HE Group Ltd
CJ Murfitt Limited	Herringswell Parish Council
Claire's Chef Agency	Highways Agency
CLT East	Highways England
Co-Housing Network	Hilgay Parish Council
Colne Parish Council	Historic England
Cottenham Parish Council	Hockwold Parish Council

<p>CPRE Cambridgeshire &amp; Peterborough</p> <p>Create Buildings LLP</p> <p>Dalham Parish Council</p> <p>DC Blayney Associates Ltd</p> <p>DPDS Consulting</p> <p>Dudley Developments</p> <p>Eagle Home Interiors Ltd</p> <p>Earith Parish Council</p> <p>EDWARD GITTINS &amp; ASSOCIATES LTD</p> <p>Huntingdonshire District Council</p> <p>Hutchinsons</p> <p>Iceni Homes</p> <p>Inland Waterways Association</p> <p>EE</p> <p>Isleham Cricket Club</p> <p>James Mann Architectural Services</p> <p>JDR Cable Systems Ltd</p> <p>Jockey Club Racecourses Limited</p> <p>Kennett Action Group</p> <p>Kennett Community Land Trust</p> <p>Kentford Parish Council</p> <p>Kings Lynn and West Norfolk District Council</p> <p>Laragh Homes</p> <p>Lidgate Parish Council</p> <p>Lines Chartered Sureyors</p> <p>Lovell</p> <p>Lyster Grillet &amp; Harding</p> <p>Manea Parish Council</p> <p>Marine Management Organisation</p> <p>Mepal Parish Council</p> <p>Ministry of Defence</p> <p>Mobile Operators Association</p> <p>Moulton Parish Council</p> <p>National Grid</p> <p>National grid</p> <p>National Trust</p> <p>Natural England</p> <p>Network Rail</p> <p>Newmarket Town Council</p>	<p>Home Builders Federation</p> <p>Home Group</p> <p>Homes and Communités Agency</p> <p>Homes England</p> <p>Hopkins Homes Ltd</p> <p>Horningsea Parish Council</p> <p>Howes Percival LLP</p> <p>HPB Management Ltd</p> <p>RG&amp;P Ltd</p> <p>RLN (UK) Ltd</p> <p>Sanctuary Group</p> <p>Savills-Smith Gore</p> <p>Scotsdale Hill</p> <p>Scott Properties</p> <p>SE Cambs Liberal Democrats</p> <p>Sentry Ltd</p> <p>Shaping Communities Ltd</p> <p>ShrimplinBrown Planning and Development</p> <p>Simon J Wilson Architects</p> <p>Soham CLT</p> <p>Soham Town Council</p> <p>South Cambridgeshire District Council</p> <p>Southery Parish Council</p> <p>Sport England</p> <p>Stow-cum-Quy Parish Council</p> <p>Straus Environmental</p> <p>Stretham and Wilburton CLT</p> <p>Strutt and Parker</p> <p>Sttrutt and Parker LLP</p> <p>Suffolk County Council</p> <p>Sustrans East of England</p> <p>Sutton Parish Council</p> <p>Swaffam Prior CLT</p> <p>Swaffham Prior Community Land Trust</p> <p>Tetlow King</p> <p>The Coal Authority</p> <p>The Ely Group of Drainage Boards</p>
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NHS England	The Lady Frances Hospital Almshouse Charity
NKW Design	The Wildlife Trust
Norfolk County Council	The Woodland Trust
Ousden Parish Council	Theatres Trust
Palace Green Homes	Three
Pegasus Planning Group	Timothy Smith and Jonathan Taylor LLP
Peter Humphrey Associates	UK Power Networks
Phase 2 Planning and Development	Unex Corporation Ltd
Phillips Planning Services Ltd	Universal Garage
Pigeon Investment Management	Verity & Beverley
Places4People	Virgin Media
Plain View	Ward Gethin Archer
Plainview Planning Ltd	Waterbeach Parish Council
Planinfo	Welney Parish Council
Planning Potential Ltd	West Suffolk Councils
Pocock and Shaw	Westbury Garden Rooms
Ragilbury Roots Ltd	Wildlife Trust BCN
Ramblers Association (North)	Willingham Parish Council
Rapleys	Michael Rose
Red Lodge Parish Council	Andrew Holland
Witchford CLT	Aidan and Karen Walmsley
Woods Hardwick Ltd	Adrian Fleet
WYG	Alan Kirk
Advance Land & Planning Ltd	Alastair Watson
Advance Planning	Pamela Joyce
Amec Foster Wheeler E&I UK	Alexa Pearson
Andrew Fleet MCIAT	Christine Ambrose Smith
Armstrong Rigg Planning	David Ambrose Smith
Ashley Parish Council	Amy Wright
Barton Willmore	Andrew Taylor
Beacon Planning Ltd	Antony Cornell
BGG Associates Ltd	Michael Anthony
Bidwells	Bridget
Brown & Co	Lesley Audus
Cambridgeshire County Council	Robert Thomson
Carter Jonas LLP	Ian Wright
Cheffins	Stephen Butler
Churchgate Property	



City of Ely Council	Alison	Bye
CODE Development Planners	Cary	Simpson
Construct Reason LTD	Conor	O'Brien
Deloitte Real Estate	Phyllis	Rusk
Denley Draughting Limited	Cheryl	Jowett
Eclipse Planning Services	Cheryl	Cox
Education and Skills Funding Agency	Clare	French
Edward Gittins & Associates	Su	Field
EJW Planning Ltd	Catherine	Judkins
Framptons Town Planning Ltd	Francesca	Wray
Freemantle Developments Limited	Chris	Hurrell
Gladman Development Limited	Catherine	George
Haddenham Parish Council	Dale	Ingham
Historic England	David	Porter
Hollins Strategic Land	David	
Hopkins Homes Ltd	Charles	Werner
Howes Percival LLP	David	Watson
Hutchinsons	Dawn	Buck
Indigo Planning	David	Chaplin
Infinity Architects	Diana	Ward
JMS Planning & Development Ltd	Diana	Donald
Juniper Real Estate	Gary	Lindsay
K Garnham Design	Geoffrey	Reed
King West	George	Rusk
Lacy, Scott & Knight	Gareth	Maslen
Manor Investments Ltd	Graham	Thompson
Martindales Architects Ltd	Greg	Saberton
Mattanna Ltd	Geoffrey	Woollard
MWS Architectural	Hilary	Threadgold
Navigate Planning Ltd	Hugo	Upton
NJL Consulting	Ian and Birgit	Boylett
Oxalis Planning Ltd	Ian	Gilbert
Pegasus Group	Jacqueline	Jones
Pegasus Planning Group	P.J	Smith
Percival and Company	B & V	Roberts
Peter Brett Associate LLP	Aaron	Jacobs
Pigeon Investment Management Ltd	James	D'Souza
PlanSurv Ltd	Lesley Jan	Eaton
Pocock & Shaw	Jenny	Sherlock

PRP	John	Rees
Rapleys LLP	Jo	Braybrooke
Redrow Homes Ltd	John	Bridges
Richborough Estates Ltd	John	Powell
RPS Consulting	John	Armour
RPS Planning & Development	John	San Vicente
Savills	Jonathan	Cook
Savills (UK) Ltd	John W	Smith
Simon Pott and Co	Katharine	Cantell
Strutt and Parker	Karl	Dunn
Strutt and Parker LLP	Kevin	Arrowsmith
Swann Edwards Architecture	Laura	Ross
Sworders	Lauren	Whitworth
Tetlow King Planning	Lisa	Stubbs
The Design Partnership (Ely) Ltd	Elizabeth	Hunter
The Environmental Partnership	Elizabeth	Houghton
Third Party Delivery Ltd	Lorna	Dupre
Town Planning Intelligence	Mark	Inskip
Troy Planning & Design	Malcolm	Palmer
Turley Associates Ltd	Mark	Goldsack
Unex Corporation Ltd	Michael	Murfitt
William H Brown	Edwina	Newbury
Williams Griffiths Architects	Niki	Allsop
Wood PLC	Nigel	Cooper
Woolley Project Management Limited	Mark	Robertson
WYG	Phil	Newell
WYG Planning & Environment	David	Alberry-King
Amy Richardson	Christopher	Threadgold
Andrew Boughton	Peter &	
Ben Pridgeon	Laura	Wood
Marilyn Strand	Malcolm	Malcolm Roper
David Barker	Bob	Joy
Ellie Zdyrko	Rhodri	Pashley
Margaret Franklin	Rachel and	
Ian Smith	John	Rees
Jamie Palmer	Roger &	
Jackie Ford	Jennifer	Johnson
Kate Wood	Robert	Boyle
Meghan Bonner	Robert	Algar

Andrew Fleet		Robin	Threadgold
Mark Baker		Roderick	Smith
Mark McGovern		Rod	Hart
Nina Crabb		Rodger	Germany
Peter Frampton		Roy	Pallett
Rebecca Sharpe		Angus	Runciman
Sarah Hornbrook		Ruth	Paskins Gordon
SJK Planning		Ryan	Jones
Suzanne Nugent		Sue	Burnsnel
Tony Welland		Frank and	
Richard Agnew		Shirley	Broadfield
Terry	Frost	Stuart	Cooper
Alison	Glover / Spencer	shelagh	Monteith
Lisa	O'Mahony	Simon	Raffe
Tim	Bonavia	Selina	Boyce
Philip	Scott	Stephen	Burgess
Tom	Edwardes	Steve	Plumb
Anthony	Jolley	Susan	Frankland
Anthony	Weston		
stygol	Stygol		
Trevor	Edwards		
Anthony	French		
Viva Arts and Community Group			
Daniel	Pullan		
Peter	Landshoff		
Maureen	Munks		
Becky	Lockyer		

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**2021/22 ANNUAL TREASURY MANAGEMENT STRATEGY, MINIMUM REVENUE PROVISION POLICY STATEMENT AND ANNUAL INVESTMENT STRATEGY**

Committee: Finance and Assets Committee

Date: 25<sup>th</sup> January 2021

Author: Finance Manager

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**1.0 ISSUE**

1.1 To consider the 2021/22 Treasury Management Strategy, the Annual Investment Strategy and the Minimum Revenue Provision Policy Statement.

**2.0 RECOMMENDATIONS**

2.1 That the Finance and Assets Committee recommends to Full Council to approve:

- The 2021/22 Treasury Management Strategy
- The Annual Investment Strategy
- The Minimum Revenue Provision Policy Statement
- The Prudential and Treasury Indicators.

**3.0 BACKGROUND / OPTIONS**

3.1 CIPFA Requirements

The Council has adopted the CIPFA (Chartered Institute of Public Finance and Accountancy) Code of Practice on Treasury Management and any subsequent revisions.

3.2 The Treasury Management Policy Statement

As per CIPFA's definition, the Council defines its treasury management activities as:

- The management of the Council's investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.
- The Council regards the successful identification, monitoring and control of risk to be the prime criteria by which the effectiveness of its treasury management activities will be measured. Accordingly, the analysis and

reporting of treasury management activities will focus on their risk implications for the Council, and any financial instruments entered into to manage these risks.

- The Council acknowledges that effective treasury management will provide support towards the achievement of its business and service objectives. It is therefore committed to the principles of achieving value for money in treasury management, and to employing suitable comprehensive performance measurement techniques, within the context of effective risk management.

The Council will create and maintain, as the cornerstones for effective treasury management:

- a treasury management policy statement, stating the policies, objectives and approach to risk management of its treasury management activities;
- suitable treasury management practices (TMPs), setting out the manner in which the Council will seek to achieve those policies and objectives, and prescribing how it will manage and control those activities.

The content of the policy statement and TMPs will follow the recommendations contained in Sections 6 and 7 of the CIPFA Code, subject only to amendment where necessary to reflect the particular circumstances of this Council. Such amendments will not result in the Council materially deviating from the Code's key principles.

- Full Council will receive reports on its treasury management policies, practices and activities, including, as a minimum, an annual strategy and plan in advance of the financial year (this report), a mid-year review and an annual report after financial close, in the form prescribed in its TMPs.
- The Council delegates responsibility for the implementation and regular monitoring of its treasury management policies and practices to the Finance and Assets Committee, and for the execution and administration of treasury management decisions to the Finance Manager and Section 151 Officer, who will act in accordance with the Council's policy statement and TMPs and as a CIPFA member, CIPFA's Standard of Professional Practice on Treasury Management.
- The Council nominates Finance and Assets Committee to be responsible for ensuring effective scrutiny of the treasury management strategy and policies.

### 3.3 Investment Strategy

The Council continues to hold significant reserves (January 2021) and has been able, up until now, to meet the costs of the loans to East Cambs Trading Company

(ECTC), the construction of the Leisure Centre and the purchase of Waste fleet from internal borrowing against these reserves; therefore without the need for external borrowing. This situation is forecast to continue in 2021/22.

The Council continues to hold cash balances in advance of those needed to cover internal borrowing and these will be invested in line with the criteria detailed in the Treasury Management Strategy (appendix 1 to this report).

The continuation of low interest rates means that some smaller short term investment dealings will not return a beneficial return on investment, compared to the transaction cost of moving the cash. Small investments over a short period of time will therefore continue to be reviewed to determine if the investment is cash efficient. Where these circumstances arise, this will result in a higher balance in the Council's NatWest Account than would have historically been the case; however we will ensure that this balance remains within the counterparty limit set in the strategy.

It is expected that ECTC will repay the full cumulative balance of outstanding loans to the Council on 31<sup>st</sup> March 2021. At which point, the Council will make two further loan facilities available to the Company, these up to a cumulative value of £4.9 million. In line with the loan agreements, these new loans are due to be repaid in 2023.

### 3.4 Borrowing Strategy

The Council continues to hold reserves so internal cash balances are being used to fund capital commitments. This situation is expected to continue and while cash balances will reduce in the remainder of this financial year and in future years, it is now forecast that no external borrowing will be required in 2021/22. This situation will be continually monitored as we go into the new financial year.

### 3.5 Counterparty Limits

The Counterparty limits were reviewed in the 2016/17 Treasury Management Strategy and approved by Council. There are no amendments to report.

## 4.0 **APPENDICES**

### 4.1 Appendix 1 - Treasury Management Strategy Statement, Minimum Revenue Provision Policy Statement and Annual Investment Strategy

**Background Documents****Location****Contact Officer**

The Prudential Code  
published by CIPFA

Treasury Management  
Practice Schedules

Revenue Budget, Capital  
Programme and Council  
Tax 2021/22 Report (also  
on this agenda)

Room 104  
The Grange  
Ely

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# **Treasury Management Strategy Statement**

Minimum Revenue Provision Policy Statement  
and Annual Investment Strategy

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East Cambridgeshire District Council  
2021/22



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# 1.INTRODUCTION

## 1.1 Background

The Council is required to operate a balanced budget, which broadly means that cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties or instruments commensurate with the Council's low risk appetite, providing adequate liquidity initially before considering investment return.

The second main function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer-term cash flow planning, to ensure that the Council can meet its capital spending obligations. This management of longer-term cash may involve arranging long or short-term loans, or using longer-term cash flow surpluses. On occasion, when it is prudent and economic, any debt previously drawn may be restructured to meet Council risk or cost objectives.

The contribution the treasury management function makes to the authority is critical, as the balance of debt and investment operations ensure liquidity or the ability to meet spending commitments as they fall due, either on day-to-day revenue or for larger capital projects. The treasury operations will see a balance of the interest costs of debt and the investment income arising from cash deposits affecting the available budget. Since cash balances generally result from reserves and balances, it is paramount to ensure adequate security of the sums invested, as a loss of principal will in effect result in a loss to the General Fund Balance.

CIPFA defines treasury management as:

*"The management of the local authority's borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."*

This authority has not engaged in any commercial investments and has no non-treasury investments other than the loans to East Cambridgeshire Trading Company.

## 1.2 Reporting requirements

### 1.2.1 Capital Strategy

The CIPFA 2017 Prudential and Treasury Management Codes require all local authorities to prepare a capital strategy report which will provide the following:

- a high-level long term overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services
- an overview of how the associated risk is managed
- the implications for future financial sustainability

The aim of this capital strategy is to ensure that all elected members on the full council fully understand the overall long-term policy objectives and resulting capital strategy requirements, governance procedures and risk appetite.

## 1.2.2 Treasury Management reporting

The Council is currently required to receive and approve, as a minimum, three main treasury reports each year, which incorporate a variety of policies, estimates and actuals.

- a. **Prudential and treasury indicators and treasury strategy** (this report) - The first, and most important report is forward looking and covers:
  - the capital plans, (including prudential indicators);
  - a minimum revenue provision (MRP) policy, (how residual capital expenditure is charged to revenue over time);
  - the treasury management strategy, (how the investments and borrowings are to be organised), including treasury indicators; and
  - an investment strategy, (the parameters on how investments are to be managed).
- b. **A mid-year treasury management report** – This is primarily a progress report and will update members on the capital position, amending prudential indicators as necessary, and whether any policies require revision.
- c. **An annual treasury report** – This is a backward looking review document and provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy.

### Scrutiny

The above reports are required to be adequately scrutinised before being recommended to the Council. This role is undertaken by the Finance and Assets Committee.

## 1.3 Treasury Management Strategy for 2021/22

The strategy for 2021/22 covers two main areas:

### Capital issues

- the capital expenditure plans and the associated prudential indicators;
- the minimum revenue provision (MRP) policy.

### Treasury management issues

- the current treasury position;
- treasury indicators which limit the treasury risk and activities of the Council;
- prospects for interest rates;
- the borrowing strategy;
- policy on borrowing in advance of need;
- the investment strategy;
- creditworthiness policy; and
- the policy on use of external service providers.

These elements cover the requirements of the Local Government Act 2003, the CIPFA Prudential Code, MHCLG MRP Guidance, the CIPFA Treasury Management Code and MHCLG Investment Guidance.

#### **1.4 Training**

The CIPFA Code requires the responsible officer to ensure that members with responsibility for treasury management receive adequate training in treasury management. This especially applies to members responsible for scrutiny.

The training needs of treasury management officers are periodically reviewed.

#### **1.5 Treasury management consultants**

The Council uses Link Group, Treasury solutions as its external treasury management advisors.

The Council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon the services of our external service providers. All decisions will be undertaken with regards to all available information, including, but not solely, our treasury advisers.

It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented and subjected to regular review.

## 2 THE CAPITAL PRUDENTIAL INDICATORS 2021/22 – 2023/24

The Council's capital expenditure plans are the key driver of treasury management activity. The output of the capital expenditure plans is reflected in the prudential indicators, which are designed to assist members' overview and confirm capital expenditure plans.

### 2.1 Capital expenditure

This prudential indicator is a summary of the Council's capital expenditure plans, both those agreed previously, and those forming part of this budget cycle. Members are asked to approve the capital expenditure forecasts:

Capital expenditure £000	2019/20 Actual	2020/21 Estimate	2021/22 Estimate	2022/23 Estimate	2023/24 Estimate
Operational Services	1,054	1,166	3,687	841	841
Finance & Assets	1,310	7,549	140	40	40
<b>Total</b>	<b>2,364</b>	<b>8,715</b>	<b>3,827</b>	<b>881</b>	<b>881</b>

The table below summarises the above capital expenditure plans and how these plans are being financed by capital or revenue resources. Any shortfall of resources results in a funding borrowing need.

Financing of capital expenditure £000	2019/20 Actual	2020/21 Estimate	2021/22 Estimate	2022/23 Estimate	2023/24 Estimate
Capital receipts	525	646	266	266	266
Capital grants	526	608	526	526	526
Section 106 & CIL	1,832	1,035	89	89	89
Revenue	13	89	0	0	0
<b>Net financing need for the year</b>	<b>-532</b>	<b>6,337</b>	<b>2,946</b>	<b>0</b>	<b>0</b>

### 2.2 The Council's borrowing need (the Capital Financing Requirement)

The second prudential indicator is the Council's Capital Financing Requirement (CFR). The CFR is simply the total historic outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Council's indebtedness and so its underlying borrowing need. Any capital expenditure above, which has not immediately been paid for through a revenue or capital resource, will increase the CFR.

The CFR does not increase indefinitely, as the minimum revenue provision (MRP) is a statutory annual revenue charge which broadly reduces the indebtedness in line with each asset's life, and so charges the economic consumption of capital assets as they are used.

The CFR includes any other long-term liabilities (e.g. finance leases). Whilst these increase the CFR, and therefore the Council's borrowing requirement, these types of scheme include a borrowing facility by the lease provider and so the Council is not required to separately borrow for these schemes. The Council currently has no such schemes within the CFR.

The Council is asked to approve the CFR projections below:

£000	2019/20 Actual	2020/21 Estimate	2021/22 Estimate	2022/23 Estimate	2023/24 Estimate
<b>Capital Financing Requirement</b>					
<b>CFR Brought Forward</b>	14,486	11,761	11,178	13,731	9,013
<b>Movement in CFR</b>	<b>-2,725</b>	-583	2,553	-4,718	-1,479
<b>Total CFR</b>	<b>11,761</b>	<b>11,178</b>	<b>13,731</b>	<b>9,013</b>	<b>7,534</b>

<b>Movement in CFR represented by</b>					
Net financing need for the year (above)	-532	6,337	2,946	0	0
Repayment of Loan by ECTC	-1,700	-6,500	0	-4,070	-830
Less MRP and other financing movements	-493	-420	-393	-648	-649
<b>Movement in CFR</b>	<b>2,725</b>	<b>-583</b>	<b>2,553</b>	<b>-4,718</b>	<b>-1,479</b>

### 2.3 Core funds and expected investment balances

The application of resources (capital receipts, reserves etc.) to either finance capital expenditure or other budget decisions to support the revenue budget will have an ongoing impact on investments unless resources are supplemented each year from new sources (asset sales etc.). Detailed below are estimates of the year-end balances for each resource and anticipated day-to-day cash flow balances.

Year End Resources £000	2019/20 Actual	2020/21 Estimate	2021/22 Estimate	2022/23 Estimate	2023/24 Estimate
Fund balances / reserves	9,625	9,079	7,230	3,719	4,330
Capital receipts	1,385	839	623	408	192
Provisions	1,449	1,449	1,449	1,449	1,449
Section 106 / CIL	5,487	6,052	5,952	5,852	5,752
Working capital*	4,692	4,692	4,692	4,692	4,692
Internal borrowing	-11,761	-11,178	-13,731	-9,013	-7,534
<b>Expected investments</b>	<b>10,877</b>	<b>10,933</b>	<b>6,215</b>	<b>7,107</b>	<b>8,881</b>

\*Working capital balances shown are estimated year-end; these may be higher mid-year

### 2.4 Minimum revenue provision (MRP) policy statement

The Council is required to pay off an element of the accumulated General Fund capital spend each year (the CFR) through a revenue charge (the minimum revenue provision - MRP), although it is also allowed to undertake additional voluntary payments if required (voluntary revenue provision - VRP).

MHCLG regulations have been issued which require the full Council to approve an **MRP Statement** in advance of each year. A variety of options are provided to councils, so long as there is a prudent provision. The Council is recommended to approve the following MRP Statement:

The Council had no outstanding borrowing from before 1 April 2008

From 1 April 2008 for all unsupported borrowing the MRP policy will be **Asset life method** – MRP will be based on the estimated life of the assets, in accordance

with the regulations (this option must be applied for any expenditure capitalised under a Capitalisation Direction) (option 3);

Asset lives' used in MRP calculations are:

Waste Fleet	9 years
Leisure Centre	25 years
Depot	25 Years
ECTC Loan	No MRP provision is made on the loans to ECTC as the loans will be repaid by the Company in line with the loan agreements and used to reduce the Council's Capital Financing Requirement at that time.

This option provides for a reduction in the borrowing requirement in line with the asset's expected life.

### 3 BORROWING

The capital expenditure plans set out in Section 2 provide details of the service activity of the Council. The treasury management function ensures that the Council's cash is organised in accordance with the relevant professional codes, so that sufficient cash is available to meet this service activity and the Council's capital strategy. This will involve both the organisation of the cash flow and, where capital plans require, the organisation of appropriate borrowing facilities. The strategy covers the relevant treasury / prudential indicators, the current and projected debt positions and the annual investment strategy.

#### 3.1 Current portfolio position

The overall treasury management portfolio as at 31 March 2020 was that the Council had £10.877 million of treasury investments, and had no external borrowing.

Banks	£3.094 million
Local Authorities	£1.000 million
Money Market Funds	£6.783 million

The up-dated position at 31<sup>st</sup> December 2020 was that the Council remained external debt free, with £23.937 million invested as detailed below.

Banks	£7.657 million
Money Market Funds	£16.280 million

This reflects, to some degree, the income / expenditure flows of the Council as a collection authority. Council Tax tends to be collected in the first ten months of the year, but the money we pay out to precepting authorities is more evenly spaced, with one Council Tax collection date and two precept payment dates in the final quarter of the year. This year, however, it also reflects the impact of the Covid-19 pandemic on the Council's finances, with Government paying a number of grants earlier in the year than they would normally have done and also providing the Council with funding in advance to pay out grants to local businesses.

The Council's forward projections for borrowing are summarised below. The table shows the actual external debt, against the underlying capital borrowing need, (the Capital Financing Requirement - CFR), highlighting any over or under borrowing.

£m	2019/20 Actual	2020/21 Estimate	2021/22 Estimate	2022/23 Estimate	2023/24 Estimate
<b>External Debt</b>					
Debt at 1 April	0	0	0	0	0
Expected change in Debt	0	0	0	0	0
Actual gross debt at 31 March	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
The Capital Financing Requirement	<b>11,761</b>	<b>11,178</b>	<b>13,731</b>	<b>9,013</b>	<b>7,534</b>
Under / (over) borrowing	<b>11,761</b>	<b>11,178</b>	<b>13,731</b>	<b>9,013</b>	<b>7,534</b>

Within the range of prudential indicators there are a number of key indicators to ensure that the Council operates its activities within well-defined limits. One of these is that the Council needs to ensure that its gross debt does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for 2021/22 and the following two financial years. This allows some flexibility for limited early



borrowing for future years but ensures that borrowing is not undertaken for revenue or speculative purposes.

The Finance Manager reports that the Council complied with this prudential indicator in the current year and does not envisage difficulties for the future. This view takes into account current commitments, existing plans, and the proposals in this budget report.

### 3.2 Treasury Indicators: limits to borrowing activity

**The operational boundary.** This is the limit beyond which external debt is not normally expected to exceed. In most cases, this would be a similar figure to the CFR, but may be lower or higher depending on the levels of actual debt and the ability to fund under-borrowing by other cash resources.

<b>Operational boundary £000</b>	<b>2020/21 Estimate</b>	<b>2021/22 Estimate</b>	<b>2022/23 Estimate</b>	<b>2023/24 Estimate</b>
External Debt	0	0	0	0
Other long term liabilities	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

**The authorised limit for external debt.** This is a key prudential indicator and represents a control on the maximum level of borrowing. This represents a legal limit beyond which external debt is prohibited, and this limit needs to be set or revised by the full Council. It reflects the level of external debt which, while not desired, could be afforded in the short term, but is not sustainable in the longer term.

1. This is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all councils' plans, or those of a specific council, although this power has not yet been exercised.
2. The Council is asked to approve the following authorised limit:

<b>Authorised limit £m</b>	<b>2020/21 Estimate</b>	<b>2021/22 Estimate</b>	<b>2022/23 Estimate</b>	<b>2023/24 Estimate</b>
External Debt	10,000	10,000	10,000	10,000
Other long term liabilities	0	0	0	0
<b>Total</b>	<b>10,000</b>	<b>10,000</b>	<b>10,000</b>	<b>10,000</b>

### 3.3 Prospects for interest rates

The Council has appointed Link Group as its treasury advisor and part of their service is to assist the Council to formulate a view on interest rates. Link provided the following forecasts on 11.8.20. However, following the conclusion of the review of PWLB margins over gilt yields on 25.11.20, all forecasts below have been reduced by 1%. These are forecasts for certainty rates, gilt yields plus 80bps:

Link Group Interest Rate View 9.11.20													
These Link forecasts have been amended for the reduction in PWLB margins by 1.0% from 26.11.20													
	Mar-21	Jun-21	Sep-21	Dec-21	Mar-22	Jun-22	Sep-22	Dec-22	Mar-23	Jun-23	Sep-23	Dec-23	Mar-24
BANK RATE	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
3 month ave earnings	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
6 month ave earnings	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
12 month ave earnings	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20
5 yr PWLB	0.80	0.80	0.80	0.80	0.90	0.90	0.90	0.90	0.90	1.00	1.00	1.00	1.00
10 yr PWLB	1.10	1.10	1.10	1.10	1.20	1.20	1.20	1.20	1.20	1.30	1.30	1.30	1.30
25 yr PWLB	1.50	1.60	1.60	1.60	1.60	1.70	1.70	1.70	1.70	1.80	1.80	1.80	1.80
50 yr PWLB	1.30	1.40	1.40	1.40	1.40	1.50	1.50	1.50	1.50	1.60	1.60	1.60	1.60

Additional notes by Link on this forecast table: -

- Please note that we have made a slight change to our interest rate forecasts table above for forecasts for 3, 6 and 12 months. Traditionally, we have used LIBID forecasts, with the rate calculated using market convention of 1/8th (0.125%) taken off the LIBOR figure. Given that all LIBOR rates up to 6m are currently running below 10bps, using that convention would give negative figures as forecasts for those periods. However, the liquidity premium that is still in evidence at the short end of the curve means that the rates actually being achieved by local authority investors are still modestly in positive territory. While there are differences between counterparty offer rates, our analysis would suggest that an average rate of around 10 bps is achievable for 3 months, 10bps for 6 months and 20 bps for 12 months.
- During 2021, Link will be continuing to look at market developments in this area and will monitor these with a view to communicating with clients when full financial market agreement is reached on how to replace LIBOR. This is likely to be an iteration of the overnight SONIA rate and the use of compounded rates and Overnight Index Swap (OIS) rates for forecasting purposes.
- We will maintain continuity by providing clients with LIBID investment benchmark rates on the current basis.

The coronavirus outbreak has done huge economic damage to the UK and economies around the world. After the Bank of England took emergency action in March to cut Bank Rate to first 0.25%, and then to 0.10%, it left Bank Rate unchanged at its subsequent meetings to 16<sup>th</sup> December, although some forecasters had suggested that a cut into negative territory could happen. However, the Governor of the Bank of England has made it clear that he currently thinks that such a move would do more damage than good and that more quantitative easing is the favoured tool if further action becomes necessary. As shown in the forecast table above, no increase in Bank Rate is expected in the near-term as economic recovery is expected to be only gradual and, therefore, prolonged. These forecasts were based on an assumption that a Brexit trade deal would be agreed by 31<sup>st</sup> December 2020: as this has now occurred, these forecasts do not need to be revised.

### **Gilt yields / PWLB rates**

There was much speculation during the second half of 2019 that bond markets were in a bubble which was driving bond prices up and yields down to historically very low levels. The context for that was a heightened expectation that the US could have been heading for a recession in 2020. In addition, there were growing expectations of a downturn in world economic growth, especially due to fears around the impact of the trade war between the US and China, together with inflation generally at low levels in most countries and expected to remain subdued. Combined, these conditions were conducive to very low bond yields. While inflation targeting by the major central banks has been successful over the last thirty years in lowering inflation expectations, the real equilibrium rate for central rates has fallen considerably due to the high level of borrowing by consumers. This means that central banks do not need to raise rates as much now to have a major impact on consumer spending, inflation, etc. The consequence of this has been the gradual lowering of the overall level of interest rates and bond yields in financial markets over the last 30 years. Over the year prior to the coronavirus crisis, this has seen many bond yields up to 10 years turn negative in the Eurozone. In addition, there has, at times, been an inversion of bond yields in the US whereby 10 year yields have fallen below shorter term yields. In the past, this has been a precursor of a recession. The other side of this coin is that bond prices are elevated as investors would be expected to be moving out of riskier assets i.e. shares, in anticipation of a downturn in corporate earnings and so selling out of equities.

Gilt yields had therefore already been on a generally falling trend up until the coronavirus crisis hit western economies during March 2020. After gilt yields spiked up during the financial crisis in March, we have seen these yields fall sharply to unprecedented lows as investors panicked during March in selling shares in anticipation of impending recessions in western economies, and moved cash into safe haven assets i.e. government bonds. However, major western central banks took rapid action to deal with excessive stress in financial markets during March, and started massive quantitative easing purchases of government bonds: this also acted to put downward pressure on government bond yields at a time when there has been a huge and quick expansion of government expenditure financed by issuing government bonds. Such unprecedented levels of issuance in “normal” times would have caused bond yields to rise sharply. Gilt yields and PWLB rates have been at remarkably low rates so far during 2020/21.

As the interest forecast table for PWLB certainty rates above shows, there is expected to be little upward movement in PWLB rates over the next two years as it will take economies, including the UK, a prolonged period to recover all the momentum they have lost in the sharp recession caused during the coronavirus shut down period. From time to time, gilt yields, and therefore PWLB rates, can be subject to exceptional levels of volatility due to geo-political, sovereign debt crisis, emerging market developments and sharp changes in investor sentiment, (as shown on 9<sup>th</sup> November when the first results of a successful COVID-19 vaccine trial were announced). Such volatility could occur at any time during the forecast period.

### **Investment and borrowing rates**

- **Investment returns** are likely to remain exceptionally low during 2021/22 with little increase in the following two years.
- **Borrowing interest rates** fell to historically very low rates as a result of the COVID crisis and the quantitative easing operations of the Bank of England: indeed, gilt yields up to 6 years were negative during most of the first half of 2020/21. The policy of avoiding new borrowing by running down spare cash balances has served local authorities well over the last few years. The unexpected increase of 100 bps in

PWLB rates on top of the then current margin over gilt yields of 80 bps in October 2019, required an initial major rethink of local authority treasury management strategy and risk management. However, in March 2020, the Government started a consultation process for reviewing the margins over gilt rates for PWLB borrowing for different types of local authority capital expenditure. *(Please note that Link has concerns over this approach, as the fundamental principle of local authority borrowing is that borrowing is a treasury management activity and individual sums that are borrowed are not linked to specific capital projects.)* It also introduced the following rates for borrowing for different types of capital expenditure: -

- **PWLB Standard Rate** is gilt plus 200 basis points (G+200bps)
  - **PWLB Certainty Rate** is gilt plus 180 basis points (G+180bps)
  - **PWLB HRA Standard Rate** is gilt plus 100 basis points (G+100bps)
  - **PWLB HRA Certainty Rate** is gilt plus 80bps (G+80bps)
  - **Local Infrastructure Rate** is gilt plus 60bps (G+60bps)
- As a consequence of these increases in margins, many local authorities decided to refrain from PWLB borrowing unless it was for HRA or local infrastructure financing, until such time as the review of margins was concluded.
  - On 25<sup>th</sup> November 2020, the Chancellor announced the conclusion to the review of margins over gilt yields for PWLB rates; the standard and certainty margins were reduced by 1% but a prohibition was introduced to deny access to borrowing from the PWLB for any local authority which had purchase of assets for yield in its three year capital programme. The new margins over gilt yields are as follows: -
    - **PWLB Standard Rate** is gilt plus 100 basis points (G+100bps)
    - **PWLB Certainty Rate** is gilt plus 80 basis points (G+80bps)
    - **PWLB HRA Standard Rate** is gilt plus 100 basis points (G+100bps)
    - **PWLB HRA Certainty Rate** is gilt plus 80bps (G+80bps)
    - **Local Infrastructure Rate** is gilt plus 60bps (G+60bps)
  - **Borrowing for capital expenditure.** As Link's long-term forecast for Bank Rate is 2.00%, and all PWLB rates are under 2.00%, there is now value in borrowing from the PWLB for all types of capital expenditure for all maturity periods, especially as current rates are at historic lows. However, greater value can be obtained in borrowing for shorter maturity periods so the Council will assess its risk appetite in conjunction with budgetary pressures to reduce total interest costs. Longer-term borrowing could also be undertaken for the purpose of certainty, where that is desirable, or for flattening the profile of a heavily unbalanced maturity profile.
  - While this authority will not be able to avoid borrowing to finance new capital expenditure in the longer term, to replace the rundown of reserves, there will be a cost of carry, (the difference between higher borrowing costs and lower investment returns), to any new borrowing that causes a temporary increase in cash balances as this position will, most likely, incur a revenue cost.

### 3.4 Borrowing strategy

The Council is currently maintaining an under-borrowed position. This means that the capital borrowing need, (the Capital Financing Requirement), has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow has been used as a temporary measure. This strategy is prudent as investment returns are low and counterparty risk is still an issue that needs to be considered.

Against this background and the risks within the economic forecast, caution will be adopted with the 2021/22 treasury operations. The Finance Manager will monitor

interest rates in financial markets and adopt a pragmatic approach to changing circumstances:

- *if it was felt that there was a significant risk of a sharp FALL in borrowing rates, then borrowing will be postponed.*
- *if it was felt that there was a significant risk of a much sharper RISE in borrowing rates than that currently forecast, perhaps arising from an acceleration in the rate of increase in central rates in the USA and UK, an increase in world economic activity, or a sudden increase in inflation risks, then the portfolio position will be re-appraised. Most likely, fixed rate funding will be drawn whilst interest rates are lower than they are projected to be in the next few years.*

Any decisions will be reported to the Finance and Assets Committee at the next available opportunity.

### 3.5 Policy on borrowing in advance of need

The Council will not borrow more than or in advance of its needs purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within forward approved Capital Financing Requirement estimates and will be considered carefully to ensure that value for money can be demonstrated and that the Council can ensure the security of such funds.

### 3.6 New financial institutions as a source of borrowing and / or types of borrowing

Currently the PWLB Certainty Rate is set at gilts + 80 basis points for both HRA and non-HRA borrowing. However, consideration may still need to be given to sourcing funding from the following sources for the following reasons:

- Local authorities (primarily shorter dated maturities out to 3 years or so – still cheaper than the Certainty Rate).
- Financial institutions (primarily insurance companies and pension funds but also some banks, out of forward dates where the objective is to avoid a “cost of carry” or to achieve refinancing certainty over the next few years).
- Municipal Bonds Agency (possibly still a viable alternative depending on market circumstances prevailing at the time).

Our advisors will keep us informed as to the relative merits of each of these alternative funding sources.

### 3.7 Approved Sources of Long and Short term Borrowing

	Fixed	Variable
PWLB	●	●
Municipal bond agency	●	●
Local authorities	●	●
Banks	●	●
Pension funds	●	●
Insurance companies	●	●

## 4 ANNUAL INVESTMENT STRATEGY

### 4.1 Investment policy – management of risk

The Council's investment policy has regard to the following: -

- MHCLG's Guidance on Local Government Investments ("the Guidance")
- CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes 2017 ("the Code")
- CIPFA Treasury Management Guidance Notes 2018

The Council's investment priorities will be security first, portfolio liquidity second and then yield, (return). The Council will aim to achieve the optimum return (yield) on its investments commensurate with proper levels of security and liquidity and with the Council's risk appetite. In the current economic climate it is considered appropriate to keep investments short term to cover cash flow needs. However, where appropriate (from an internal as well as external perspective), the Council will also consider the value available in periods up to six months with high credit rated financial institutions, as well as wider range fund options.

The above guidance from the MHCLG and CIPFA places a high priority on the management of risk. This authority has adopted a prudent approach to managing risk and defines its risk appetite by the following means: -

1. Minimum acceptable **credit criteria** are applied in order to generate a list of highly creditworthy counterparties. This also enables diversification and thus avoidance of concentration risk. The key ratings used to monitor counterparties are the short term and long-term ratings.
2. **Other information:** ratings will not be the sole determinant of the quality of an institution; it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To achieve this consideration the Council will engage with its advisors to maintain a monitor on market pricing such as "**credit default swaps**" and overlay that information on top of the credit ratings.
3. **Other information sources** used will include the financial press, share price and other such information pertaining to the financial sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.
4. This authority has defined the list of **types of investment instruments** that the treasury management team are authorised to use. There are two lists in appendix 5.4 under the categories of 'specified' and 'non-specified' investments.
  - **Specified investments** are those with a high level of credit quality and subject to a maturity limit of one year or have less than a year left to run to maturity, if originally they were classified as being non-specified investments solely due to the maturity period exceeding one year.
  - **Non-specified investments** are those with less high credit quality, may be for periods in excess of one year, and/or are more complex instruments which require greater consideration by members and officers before being authorised for use.

5. **Non-specified and loan investment limits.** The Council has determined that it will not engage in any non-specific investments.
6. **Lending limits**, (amounts and maturity), for each counterparty will be set through applying the matrix table in paragraph 4.2.
7. **Transaction limits** are set for each type of investment in 4.2.
8. This authority will set a limit for its investments which are invested for **longer than 365 days**, (see paragraph 4.4).
9. Investments will only be placed with counterparties from countries with a specified minimum **sovereign rating**, (see paragraph 4.3).
10. This authority has engaged **external consultants**, (see paragraph 1.5), to provide expert advice on how to optimise an appropriate balance of security, liquidity and yield, given the risk appetite of this authority in the context of the expected level of cash balances and need for liquidity throughout the year.
11. All investments will be denominated in **sterling**.
12. As a result of the change in accounting standards for 2020/21 under IFRS 9, this authority will consider the implications of investment instruments which could result in an adverse movement in the value of the amount invested and resultant charges at the end of the year to the General Fund. (In November 2018, the Ministry of Housing, Communities and Local Government, [MHCLG], concluded a consultation for a temporary override to allow English local authorities time to adjust their portfolio of all pooled investments by announcing a statutory override to delay implementation of IFRS 9 for five years ending 31<sup>st</sup> March 2023.

However, this authority will also pursue **value for money** in treasury management and will monitor the yield from investment income against appropriate benchmarks for investment performance, (see paragraph 4.5). Regular monitoring of investment performance will be carried out during the year.

#### **Changes in risk management policy from last year.**

The above criteria are unchanged from last year.

#### **4.2 Creditworthiness policy**

This Council applies the creditworthiness service provided by the Link Group. This service employs a sophisticated modelling approach utilising credit ratings from the three main credit rating agencies - Fitch, Moody's and Standard & Poor's. The credit ratings of counterparties are supplemented with the following overlays:

- "watches" and "outlooks" from credit rating agencies;
- CDS spreads that may give early warning of changes in credit ratings;
- sovereign ratings to select counterparties from only the most creditworthy countries.

This modelling approach combines credit ratings, and any assigned Watches and Outlooks in a weighted scoring system which is then combined with an overlay of CDS spreads. The end product of this is a series of colour coded bands which indicate the relative creditworthiness of counterparties. These colour codes are used by the Council to

determine the suggested duration for investments. The Council will, therefore, use counterparties within the following durational bands:

- Yellow 5 years \*
- Dark pink 5 years for Ultra-Short Dated Bond Funds with a credit score of 1.25
- Light pink 5 years for Ultra-Short Dated Bond Funds with a credit score of 1.5
- Purple 2 years
- Blue 1 year (only applies to nationalised or semi nationalised UK Banks)
- Orange 1 year
- Red 6 months
- Green not to be used
- No colour not to be used

*\* the yellow colour category is for UK Government debt, or its equivalent, money market funds and collateralised deposits where the collateral is UK Government debt*

The Link creditworthiness service uses a wider array of information other than just primary ratings. Furthermore, by using a risk weighted scoring system, it does not give undue preponderance to just one agency's ratings.

Typically, the minimum credit ratings criteria the Council use will be a short-term rating (Fitch or equivalents) of F1 and a long-term rating of A-. There may be occasions when the counterparty ratings from one rating agency are marginally lower than these ratings but may still be used. In these instances, consideration will be given to the whole range of ratings available, or other topical market information, to support their use.

All credit ratings will be monitored weekly. The Council is alerted to changes to ratings of all three agencies through its use of the Link creditworthiness service.

- if a downgrade results in the counterparty / investment scheme no longer meeting the Council's minimum criteria, its further use as a new investment will be withdrawn immediately.
- in addition to the use of credit ratings the Council will be advised of information in movements in Credit Default Swap spreads against the iTraxx European Financials benchmark and other market data on a daily basis via its Passport website, provided exclusively to it by Link. Extreme market movements may result in downgrade of an institution or removal from the Council's lending list.

Sole reliance will not be placed on the use of this external service. In addition this Council will also use market data and market information, as well as information on any external support for banks to help support its decision making process.

Y	Pi1	Pi2	P	B	O	R	G	N/C
1	1.25	1.5	2	3	4	5	6	7
Up to 5yrs	Up to 5yrs	Up to 5yrs	Up to 2yrs	Up to 1yr	Up to 1yr	Up to 6mths	Up to 100days	No Colour

The following counterparty limits were agreed in the 2016/17 Treasury Management Strategy, the same limits will be applied in 2021/22.

- £6 million with counterparties rated 6 months to 1 year (Orange) duration limit
- £5 million with Money Market Funds
- £6 million with counterparties rated up to 6 months (Red) duration limit on the approved weekly list



## Creditworthiness

Although the credit rating agencies changed their outlook on many UK banks from Stable to Negative during the quarter ended 30<sup>th</sup> June 2020 due to upcoming risks to banks' earnings and asset quality during the economic downturn caused by the pandemic, the majority of ratings were affirmed due to the continuing strong credit profiles of major financial institutions, including UK banks. However, during Q1 and Q2 2020, banks made provisions for *expected* credit losses and the rating changes reflected these provisions. As we move into future quarters, more information will emerge on *actual* levels of credit losses. (Quarterly earnings reports are normally announced in the second half of the month following the end of the quarter.) This has the potential to cause rating agencies to revisit their initial rating adjustments earlier in the current year. These adjustments could be negative or positive, although it should also be borne in mind that banks went into this pandemic with strong balance sheets. This is predominantly a result of regulatory changes imposed on banks following the Great Financial Crisis. Indeed, the Financial Policy Committee (FPC) report on 6<sup>th</sup> August revised down their expected credit losses for the UK banking sector to "somewhat less than £80bn". It stated that in its assessment, "banks have buffers of capital more than sufficient to absorb the losses that are likely to arise under the MPC's central projection". The FPC stated that for real stress in the sector, the economic output would need to be twice as bad as the MPC's projection, with unemployment rising to above 15%.

All three rating agencies have reviewed banks around the world with similar results in many countries of most banks being placed on Negative Outlook, but with a small number of actual downgrades.

## CDS prices

Although bank CDS prices, (these are market indicators of credit risk), spiked upwards at the end of March / early April 2020 due to the heightened market uncertainty and ensuing liquidity crisis that affected financial markets, they have returned to more average levels since then. Nevertheless, prices are still elevated compared to end-February 2020. Pricing is likely to remain volatile as uncertainty continues. However, sentiment can easily shift, so it will remain important to undertake continual monitoring of all aspects of risk and return in the current circumstances. Link monitor CDS prices as part of their creditworthiness service to local authorities and the Council has access to this information via its Link-provided Passport portal.

## 4.3 Other limits

Due care will be taken to consider the exposure of the Council's total investment portfolio to non-specified investments, countries, groups and sectors.

- a) **Non-specified treasury management investment limit.** The Council has determined that it will limit the maximum total exposure of treasury management investments to non-specified treasury management investments as being 10% of the total treasury management investment portfolio.
- b) **Country limit.** The Council has determined that it will only use approved counterparties from the UK and from countries with a **minimum sovereign credit rating of AA-** from Fitch (or equivalent). The list of countries that qualify using this credit criteria as at the date of this report are shown in Appendix 5.4. This list will be added to, or deducted from, by officers should ratings change in accordance with this policy.
- c) **Other limits.** In addition:

- no more than 30% will be placed with any non-UK country at any time;
- limits in place above will apply to a group of companies;
- sector limits will be monitored regularly for appropriateness.

#### 4.4 Investment strategy

**In-house funds.** Investments will be made with reference to the core balance and cash flow requirements and the outlook for short-term interest rates (i.e. rates for investments up to 12 months). Greater returns are usually obtainable by investing for longer periods. While most cash balances are required in order to manage the ups and downs of cash flow, where cash sums can be identified that could be invested for longer periods, the value to be obtained from longer term investments will be carefully assessed.

- If it is thought that Bank Rate is likely to rise significantly within the time horizon being considered, then consideration will be given to keeping most investments as being short term or variable.
- Conversely, if it is thought that Bank Rate is likely to fall within that time period, consideration will be given to locking in higher rates currently obtainable, for longer periods.

#### Investment returns expectations.

Bank Rate is unlikely to rise from 0.10% for a considerable period. It is very difficult to say when it may start rising so it is best to assume that investment earnings from money market-related instruments will be significantly below 0.50% for the foreseeable future.

The suggested budgeted investment earnings rates for returns on investments placed for periods up to about three months during each financial year are as follows (the long term forecast is for periods over 10 years in the future):

Average earnings in each year	
2020/21	0.10%
2021/22	0.10%
2022/23	0.10%
2023/24	0.10%
2024/25	0.25%
Long term later years	2.00%

- The overall balance of risks to economic growth in the UK is probably now skewed to the upside, but is subject to major uncertainty due to the virus and how quickly successful vaccines may become available and widely administered to the population. It may also be affected by what, if any, deal the UK agrees as part of Brexit.
- There is relatively little UK domestic risk of increases or decreases in Bank Rate and significant changes in shorter term PWLB rates. The Bank of England has effectively ruled out the use of negative interest rates in the near term and increases in Bank Rate are likely to be some years away given the underlying economic expectations. However, it is always possible that safe haven flows, due to unexpected domestic developments and those in other major economies, or a return of investor confidence in equities, could impact gilt yields, (and so PWLB rates), in the UK.

## Negative investment rates

While the Bank of England said in August / September 2020 that it is unlikely to introduce a negative Bank Rate, at least in the next 6 -12 months, and in November omitted any mention of negative rates in the minutes of the meeting of the Monetary Policy Committee, some deposit accounts are already offering negative rates for shorter periods. As part of the response to the pandemic and lockdown, the Bank and the Government have provided financial markets and businesses with plentiful access to credit, either directly or through commercial banks. In addition, the Government has provided large sums of grants to local authorities to help deal with the COVID crisis; this has caused some local authorities to have sudden large increases in cash balances searching for an investment home, some of which was only very short term until those sums were able to be passed on.

As for money market funds (MMFs), yields have continued to drift lower. Some managers have already resorted to trimming fee levels to ensure that net yields for investors remain in positive territory where possible and practical. Investor cash flow uncertainty, and the need to maintain liquidity in these unprecedented times, has meant there is a surfeit of money swilling around at the very short end of the market. This has seen a number of market operators, now including the DMADF, offer nil or negative rates for very short term maturities. This is not universal, and MMFs are still offering a marginally positive return, as are a number of financial institutions for investments at the very short end of the yield curve.

Inter-local authority lending and borrowing rates have also declined due to the surge in the levels of cash seeking a short-term home at a time when many local authorities are probably having difficulties over accurately forecasting when disbursements of funds received will occur or when further large receipts will be received from the Government.

**Investment treasury indicator and limit** - total principal funds invested for greater than 365 days. These limits are set with regard to the Council's liquidity requirements and to reduce the need for early sale of an investment and are based on the availability of funds after each year-end.

The Council is asked to approve the following treasury indicator and limit:

<b>Upper limit for principal sums invested for longer than 365 days</b>			
<b>£000</b>	<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>
Principal sums invested for longer than 365 days	2,000	2,000	2,000
Current investments as at 31 <sup>st</sup> December 2020 in excess of 1 year maturing in each year	0	0	0

For its cash flow generated balances, the Council will seek to utilise its business reserve instant access and notice accounts, money market funds and short-dated deposits, (overnight to 100 days), in order to benefit from the compounding of interest.

## 4.5 Investment performance / risk benchmarking

These benchmarks are simple guides to maximum risk, so they may be breached from time to time, depending on movements in interest rates and counterparty criteria. The purpose

of the benchmark is that officers will monitor the current and trend position and amend the operational strategy to manage risk as conditions change. Any breach of the benchmarks will be reported, with supporting reasons in the mid-year or Annual Report.

Security - The Council's main priority is the security of its capital, and therefore security risk continues to be its main focus, with the process for securing this detailed in Section 4.1 of this report.

This is measured / benchmarked by the use of a Historic Risk of Default calculation provided to us by Link Asset Services. The calculation is a proxy for the average percentage risk for each investment based on over 30 years of data provided by Fitch, Moody's and S&P. It simply provides a calculation of the possibility of average default against the historical default rates, adjusted for the time period within each year according to the maturity of the investment. At the end of December 2019 our calculated Historic Risk of Default was 0.0% as our cash was in either MMF, a deposit with Lloyds Bank of Scotland and a liquid call account with NatWest. As this situation is not expected to change in 2019/20, then the risk remains very small.

Liquidity – in respect of this area the Council seeks to maintain:

- No Bank overdraft
- Liquid short term deposits of at least £5 million available with a week's notice.

Yield – The Council will use the 7-day LIBID compounded rate as an investment benchmark to assess the investment performance of its investment portfolio during 2019/20.

#### **4.6 End of year investment report**

At the end of the financial year, the Council will report on its investment activity as part of its Annual Treasury Report.

## 5 APPENDICES

1. Prudential and treasury indicators
2. Economic background
3. Treasury management practice – credit and counterparty risk management
4. Approved countries for investments
5. Treasury management scheme of delegation
6. The treasury management role of the section 151 officer

## 5.1 THE CAPITAL PRUDENTIAL AND TREASURY INDICATORS 2021/22 – 2023/24

The Council's capital expenditure plans are the key driver of treasury management activity. The output of the capital expenditure plans is reflected in the prudential indicators, which are designed to assist members' overview and confirm capital expenditure plans.

### 5.1.1 Affordability prudential indicators

The previous sections cover the overall capital and control of borrowing prudential indicators, but within this framework prudential indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans on the Council's overall finances. The Council is asked to approve the following indicators:

#### Ratio of financing costs to net revenue stream

This indicator identifies the trend in the cost of capital, (borrowing and other long-term obligation costs net of investment income), against the net revenue stream.

%	2019/20 Actual	2020/21 Estimate	2021/22 Estimate	2022/23 Estimate	2023/24 Estimate
Annual Change	+3.724	+0.711	-0.216	+2.088	-0.250

The estimates of financing costs include current commitments and the proposals in this budget report.

While the above table is a statutory requirement for the Strategy document, when considering the increases in the cost of capital as a proportion of the revenue budget, it should be remembered that the majority of these costs has a direct impact of the Council's bottom line budget.

- Borrowing in relation to the Leisure Centre was funded initially from the use of internal reserves, but from 2020/21 from the management fee to be paid to the Council by the operator of the centre (including repaying the amount originally taken from reserve);
- The capital cost of the waste fleet will be charged to East Cambs Street Scene;
- The capital cost of the depot will be mostly be recovered from East Cambs Street Scene by way of an increase in rent;
- The loans to East Cambs Trading Company will generate an income to the Council as interest is being charged on this loan at a commercial rate of 3.5% in 2021/22.

## 5.2 ECONOMIC BACKGROUND

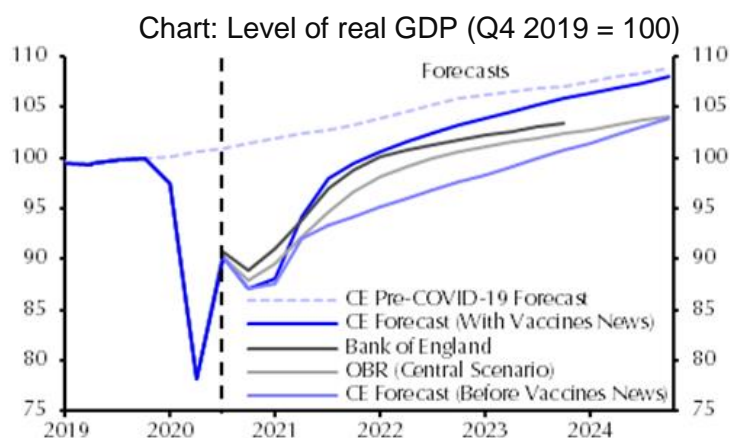
- **UK.** The key quarterly meeting of the Bank of England Monetary Policy Committee kept **Bank Rate** unchanged on 5<sup>th</sup> November 2020. However, it revised its economic forecasts to take account of a second national lockdown from 5<sup>th</sup> November 2020 to 2<sup>nd</sup> December 2020 which is obviously going to put back economic recovery and do further damage to the economy. It therefore decided to do a further tranche of **quantitative easing (QE) of £150bn**, to start in January when the current programme of £300bn of QE, announced in March to June, runs out. It did this so that “announcing further asset purchases now should support the economy and help to ensure the unavoidable near-term slowdown in activity was not amplified by a tightening in monetary conditions that could slow the return of inflation to the target”.
- Its forecasts appeared, at that time, to be rather optimistic in terms of three areas:
  - The economy would recover to reach its pre-pandemic level in Q1 2022
  - The Bank also expected there to be excess demand in the economy by Q4 2022.
  - CPI inflation was therefore projected to be a bit above its 2% target by the start of 2023 and the “inflation risks were judged to be balanced”.
- Significantly, there was no mention of **negative interest rates** in the minutes or Monetary Policy Report, suggesting that the MPC remains some way from being persuaded of the case for such a policy, at least for the next 6 -12 months. However, rather than saying that it “stands ready to adjust monetary policy”, the MPC this time said that it will take “whatever additional action was necessary to achieve its remit”. The latter seems stronger and wider and may indicate the Bank’s willingness to embrace new tools.
- One key addition to **the Bank’s forward guidance in August** was a new phrase in the policy statement, namely that “it does not intend to tighten monetary policy until there is clear evidence that significant progress is being made in eliminating spare capacity and achieving the 2% target sustainably”. That seems designed to say, in effect, that even if inflation rises to 2% in a couple of years’ time, do not expect any action from the MPC to raise Bank Rate – until they can clearly see that level of inflation is going to be persistently above target if it takes no action to raise Bank Rate. Our Bank Rate forecast currently shows no increase, (or decrease), through to quarter 1 2024 but there could well be no increase during the next five years as it will take some years to eliminate spare capacity in the economy, and therefore for inflationary pressures to rise to cause the MPC concern. **Inflation** is expected to briefly peak at just over 2% towards the end of 2021, but this is a temporary short lived factor and so not a concern.
- However, the minutes did contain several references to **downside risks**. The MPC reiterated that the “recovery would take time, and the risks around the GDP projection were judged to be skewed to the downside”. It also said “the risk of a more persistent period of elevated unemployment remained material”. Downside risks could well include severe restrictions remaining in place in some form during the rest of December and most of January too. **Upside risks** included the early roll out of effective vaccines.
- **COVID-19 vaccines.** We had been waiting expectantly for news that various COVID-19 vaccines would be cleared as being safe and effective for administering to the general public. The Pfizer announcement on 9<sup>th</sup> November was very encouraging as its 90% effectiveness was much higher than the 50-60% rate of

effectiveness of flu vaccines which might otherwise have been expected. However, this vaccine has demanding cold storage requirements of minus 70c that impairs the speed of application to the general population. It has therefore been particularly welcome that the Oxford University/AstraZeneca vaccine has now also been approved which is much cheaper and only requires fridge temperatures for storage. The Government has 60m doses on order and is aiming to vaccinate at a rate of 2m people per week starting in January, though this rate is currently restricted by a bottleneck on vaccine production; (a new UK production facility is due to be completed in June).

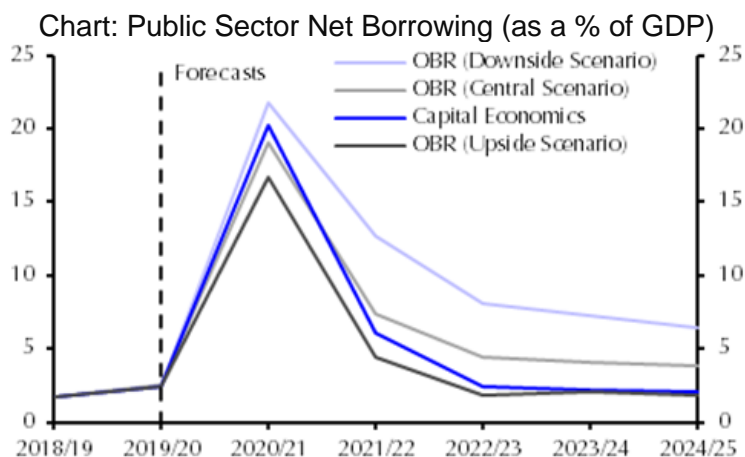
- These announcements, plus expected further announcements that other vaccines could be approved soon, have enormously boosted confidence that **life could largely return to normal during the second half of 2021**, with activity in the still-depressed sectors like restaurants, travel and hotels returning to their pre-pandemic levels; this would help to bring the unemployment rate down. With the household saving rate having been exceptionally high since the first lockdown in March, there is plenty of pent-up demand and purchasing power stored up for these services. A comprehensive roll-out of vaccines might take into late 2021 to fully complete; but if these vaccines prove to be highly effective, then there is a possibility that restrictions could start to be eased, beginning possibly in Q2 2021 once vulnerable people and front-line workers have been vaccinated. At that point, there would be less reason to fear that hospitals could become overwhelmed any more. Effective vaccines would radically improve the economic outlook once they have been widely administered; it may allow GDP to rise to its pre-virus level a year earlier than otherwise and mean that the unemployment rate peaks at 7% in 2021 instead of 9%.
- **Public borrowing** was forecast in November by the Office for Budget Responsibility (the OBR) to reach £394bn in the current financial year, the highest ever peace time deficit and equivalent to 19% of GDP. In normal times, such an increase in total gilt issuance would lead to a rise in gilt yields, and so PWLB rates. However, the QE done by the Bank of England has depressed gilt yields to historic low levels, (as has similarly occurred with QE and debt issued in the US, the EU and Japan). This means that new UK debt being issued, and this is being done across the whole yield curve in all maturities, is locking in those historic low levels through until maturity. In addition, the UK has one of the longest average maturities for its entire debt portfolio, of any country in the world. Overall, this means that the total interest bill paid by the Government is manageable despite the huge increase in the total amount of debt. The OBR was also forecasting that the government will still be running a budget deficit of £102bn (3.9% of GDP) by 2025/26. However, initial impressions are that they have taken a pessimistic view of the impact that vaccines could make in the speed of economic recovery.
- Overall, **the pace of recovery** was not expected to be in the form of a rapid V shape, but a more elongated and prolonged one. The initial recovery was sharp after quarter 1 saw growth at -3.0% followed by -18.8% in quarter 2 and then an upswing of +16.0% in quarter 3; this still left the economy 8.6% smaller than in Q4 2019. It is likely that the one month national lockdown that started on 5<sup>th</sup> November, will have caused a further contraction of 8% m/m in November so the economy may have then been 14% below its pre-crisis level.
- **December 2020 / January 2021**. Since then, there has been rapid back-tracking on easing restrictions due to the spread of a new mutation of the virus, and severe restrictions were imposed across all four nations. These restrictions were changed on 5.1.21 to national lockdowns of various initial lengths in each of the four nations



as the NHS was under extreme pressure. It is now likely that wide swathes of the UK will remain under these new restrictions for some months; this means that the near-term outlook for the economy is grim. However, the distribution of vaccines and the expected consequent removal of COVID-19 restrictions, should allow GDP to rebound rapidly in the second half of 2021 so that the economy could climb back to its pre-pandemic peak as soon as late in 2022. Provided that both monetary and fiscal policy are kept loose for a few years yet, then it is still possible that in the second half of this decade, the economy may be no smaller than it would have been if COVID-19 never happened. The significant caveat is if another mutation of COVID-19 appears that defeats the current batch of vaccines. However, now that science and technology have caught up with understanding this virus, new vaccines ought to be able to be developed more quickly to counter such a development and vaccine production facilities are being ramped up around the world.



This recovery of growth which eliminates the effects of the pandemic by about the middle of the decade would have major repercussions for public finances as it would be consistent with the government deficit falling to around 2.5% of GDP without any tax increases. This would be in line with the OBR's most optimistic forecast in the graph below, rather than their current central scenario which predicts a 4% deficit due to assuming much slower growth. However, Capital Economics forecasts assumed that there is a reasonable Brexit deal and also that politicians do not raise taxes or embark on major austerity measures and so, (perverse!), depress economic growth and recovery.

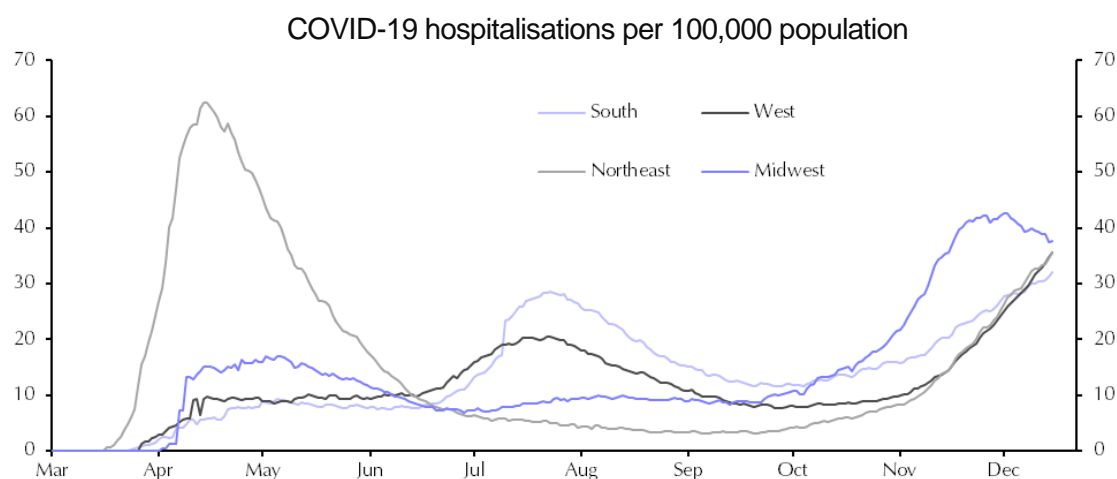


*(if unable to print in colour..... the key describing each line in the above graph is in sequential order from top to bottom in parallel with the lines in the graph.*

- There will still be some **painful longer term adjustments** as e.g. office space and travel by planes, trains and buses may not recover to their previous level of use for several years, or possibly ever, even if vaccines are fully successful in overcoming the current virus. There is also likely to be a reversal of globalisation as this crisis has exposed how vulnerable long-distance supply chains are. On the other hand, digital services are one area that has already seen huge growth.
- **Brexit.** While the UK has been gripped by the long running saga of whether or not a deal would be made by 31<sup>st</sup> December 2020, the final agreement on 24<sup>th</sup> December 2020, followed by ratification by Parliament and all 27 EU countries in the following week, has eliminated a significant downside risk for the UK economy. The initial agreement only covers trade so there is further work to be done on the services sector where temporary equivalence has been granted in both directions between the UK and EU; that now needs to be formalised on a permanent basis. As the forecasts in this report were based on an assumption of a Brexit agreement being reached, there is no need to amend these forecasts.
- **Monetary Policy Committee meeting of 17 December.** All nine Committee members voted to keep interest rates on hold at +0.10% and the Quantitative Easing (QE) target at £895bn. The MPC commented that the successful rollout of vaccines had reduced the downsides risks to the economy that it had highlighted in November. But this was caveated by it saying, “Although all members agreed that this would reduce downside risks, they placed different weights on the degree to which this was also expected to lead to stronger GDP growth in the central case.” So, while the vaccine is a positive development, in the eyes of the MPC at least, the economy is far from out of the woods. As a result of these continued concerns, the MPC voted to extend the availability of the Term Funding Scheme, (cheap borrowing), with additional incentives for small and medium size enterprises for six months from 30<sup>th</sup> April 2021 until 31<sup>st</sup> October 2021. (The MPC had assumed that a Brexit deal would be agreed.)
- **Fiscal policy.** In the same week as the MPC meeting, the Chancellor made a series of announcements to provide further support to the economy: -
  - An extension of the COVID-19 loan schemes from the end of January 2021 to the end of March.
  - The furlough scheme was lengthened from the end of March to the end of April.
  - The Budget on 3<sup>rd</sup> March 2021 will lay out the “next phase of the plan to tackle the virus and protect jobs”. This does not sound like tax rises are imminent, (which could hold back the speed of economic recovery).
- The **Financial Policy Committee** (FPC) report on 6<sup>th</sup> August 2020 revised down their expected credit losses for the banking sector to “somewhat less than £80bn”. It stated that in its assessment, “banks have buffers of capital more than sufficient to absorb the losses that are likely to arise under the MPC’s central projection”. The FPC stated that for real stress in the sector, the economic output would need to be twice as bad as the MPC’s projection, with unemployment rising to above 15%.
- **US.** The result of **the November elections** meant that while the Democrats gained the presidency and a majority in the House of Representatives, it looks as if the Republicans could retain their slim majority in the Senate provided they keep hold

of two key seats in Georgia in elections in early January. If those two seats do swing to the Democrats, they will then control both Houses and President Biden will consequently have a free hand to determine policy and to implement his election manifesto.

- **The economy** had been recovering quite strongly from its contraction in 2020 of 10.2% due to the pandemic with GDP only 3.5% below its pre-pandemic level and the unemployment rate dropping below 7%. However, the rise in new cases during quarter 4, to the highest level since mid-August, suggests that the US could be in the early stages of a fourth wave. While the first wave in March and April was concentrated in the Northeast, and the second wave in the South and West, the third wave in the Midwest looks as if it now abating. However, it also looks as if the virus is rising again in the rest of the country. The latest upturn poses a threat that the recovery in the economy could stall. This is **the single biggest downside risk** to the shorter term outlook – a more widespread and severe wave of infections over the winter months, which is compounded by the impact of the regular flu season and, as a consequence, threatens to overwhelm health care facilities. Under those circumstances, states might feel it necessary to return to more draconian lockdowns.



- The restrictions imposed to control the spread of the virus are once again weighing on the economy with employment growth slowing sharply in November and retail sales dropping back. The economy is set for further weakness in December and into the spring. However, a \$900bn fiscal stimulus deal passed by Congress in late December will limit the downside through measures which included a second round of direct payments to households worth \$600 per person and a three-month extension of enhanced unemployment insurance (including a \$300 weekly top-up payment for all claimants). GDP growth is expected to rebound markedly from the second quarter of 2021 onwards as vaccines are rolled out on a widespread basis and restrictions are loosened.
- After Chair Jerome Powell unveiled the **Fed's adoption of a flexible average inflation target** in his Jackson Hole speech in late August 2020, the mid-September meeting of the Fed agreed by a majority to a toned down version of the new inflation target in his speech - that *"it would likely be appropriate to maintain the current target range until labour market conditions were judged to be consistent with the Committee's assessments of maximum employment and inflation had risen to 2% and was on track to moderately exceed 2% for some*

*time.*" This change was aimed to provide more stimulus for economic growth and higher levels of employment and to avoid the danger of getting caught in a deflationary "trap" like Japan. It is to be noted that inflation has actually been under-shooting the 2% target significantly for most of the last decade, (and this year), so financial markets took note that higher levels of inflation are likely to be in the pipeline; long-term bond yields duly rose after the meeting. The FOMC's updated economic and rate projections in mid-September showed that officials expect to leave the fed funds rate at near-zero until at least end-2023 and probably for another year or two beyond that. There is now some expectation that where the Fed has led in changing its inflation target, other major central banks will follow. The increase in tension over the last year between the US and China is likely to lead to a lack of momentum in progressing the initial positive moves to agree a phase one trade deal.

- The Fed's meeting on **5 November** was unremarkable - but at a politically sensitive time around the elections. At its **16 December** meeting the Fed tweaked the guidance for its monthly asset quantitative easing purchases with the new language implying those purchases could continue for longer than previously believed. Nevertheless, with officials still projecting that inflation will only get back to 2.0% in 2023, the vast majority expect the fed funds rate to be still at near-zero until 2024 or later. Furthermore, officials think the balance of risks surrounding that median inflation forecast are firmly skewed to the downside. The key message is still that policy will remain unusually accommodative – with near-zero rates and asset purchases – continuing for several more years. This is likely to result in keeping Treasury yields low – which will also have an influence on gilt yields in this country.
- **EU.** In early December, the figures for Q3 GDP confirmed that the economy staged a rapid rebound from the first lockdowns. This provides grounds for optimism about growth prospects for next year. In Q2, GDP was 15% below its pre-pandemic level. But in Q3 the economy grew by 12.5% q/q leaving GDP down by "only" 4.4%. That was much better than had been expected earlier in the year. However, growth is likely to stagnate during Q4 and in Q1 of 2021, as a second wave of the virus has affected many countries: it is likely to hit hardest those countries more dependent on tourism. The €750bn fiscal support package eventually agreed by the EU after prolonged disagreement between various countries, is unlikely to provide significant support, and quickly enough, to make an appreciable difference in the countries most affected by the first wave.
- With inflation expected to be unlikely to get much above 1% over the next two years, **the ECB** has been struggling to get inflation up to its 2% target. It is currently unlikely that it will cut its central rate even further into negative territory from -0.5%, although the ECB has stated that it retains this as a possible tool to use. The ECB's December meeting added a further €500bn to the PEPP scheme, (purchase of government and other bonds), and extended the duration of the programme to March 2022 and re-investing maturities for an additional year until December 2023. Three additional tranches of TLTRO, (cheap loans to banks), were approved, indicating that support will last beyond the impact of the pandemic, implying indirect yield curve control for government bonds for some time ahead. The Bank's forecast for a return to pre-virus activity levels was pushed back to the end of 2021, but stronger growth is projected in 2022. The total PEPP scheme of €1,850bn of QE which started in March 2020 is providing protection to the sovereign bond yields of weaker countries like Italy. There is therefore unlikely to be a euro crisis while the ECB is able to maintain

this level of support. However, as in the UK and the US, the advent of highly effective vaccines will be a game changer, although growth will struggle before later in quarter 2 of 2021.

- **China.** After a concerted effort to get on top of the virus outbreak in Q1, economic recovery was strong in Q2 and then into Q3 and Q4; this has enabled China to recover all of the contraction in Q1. Policy makers have both quashed the virus and implemented a programme of monetary and fiscal support that has been particularly effective at stimulating short-term growth. At the same time, China's economy has benefited from the shift towards online spending by consumers in developed markets. These factors help to explain its comparative outperformance compared to western economies. However, this was achieved by major central government funding of yet more infrastructure spending. After years of growth having been focused on this same area, any further spending in this area is likely to lead to increasingly weaker economic returns in the longer term. This could, therefore, lead to a further misallocation of resources which will weigh on growth in future years.
- **Japan.** A third round of fiscal stimulus in early December took total fresh fiscal spending this year in response to the virus close to 12% of pre-virus GDP. That's huge by past standards, and one of the largest national fiscal responses. The budget deficit is now likely to reach 16% of GDP this year. Coupled with Japan's relative success in containing the virus without draconian measures so far, and the likelihood of effective vaccines being available in the coming months, the government's latest fiscal effort should help ensure a strong recovery and to get back to pre-virus levels by Q3 2021 – around the same time as the US and much sooner than the Eurozone.
- **World growth.** World growth will have been in recession in 2020. Inflation is unlikely to be a problem for some years due to the creation of excess production capacity and depressed demand caused by the coronavirus crisis.
- Until recent years, world growth has been boosted by increasing **globalisation** i.e. countries specialising in producing goods and commodities in which they have an economic advantage and which they then trade with the rest of the world. This has boosted worldwide productivity and growth, and, by lowering costs, has also depressed inflation. However, the rise of China as an economic superpower over the last thirty years, which now accounts for nearly 20% of total world GDP, has unbalanced the world economy. The Chinese government has targeted achieving major world positions in specific key sectors and products, especially high tech areas and production of rare earth minerals used in high tech products. It is achieving this by massive financial support, (i.e. subsidies), to state owned firms, government directions to other firms, technology theft, restrictions on market access by foreign firms and informal targets for the domestic market share of Chinese producers in the selected sectors. This is regarded as being unfair competition that is putting western firms at an unfair disadvantage or even putting some out of business. It is also regarded with suspicion on the political front as China is an authoritarian country that is not averse to using economic and military power for political advantage. The current trade war between the US and China therefore needs to be seen against that backdrop. It is, therefore, likely that we are heading into a period where there will be a **reversal of world globalisation and a decoupling of western countries** from dependence on China to supply

products. This is likely to produce a backdrop in the coming years of weak global growth and so weak inflation.

## Summary

**Central banks are, therefore, likely to support growth by maintaining loose monetary policy through keeping rates very low for longer. Governments could also help a quicker recovery by providing more fiscal support for their economies at a time when total debt is affordable due to the very low rates of interest. They will also need to avoid significant increases in taxation or austerity measures that depress demand in their economies.**

**If there is a huge surge in investor confidence as a result of successful vaccines which leads to a major switch out of government bonds into equities, which, in turn, causes government debt yields to rise, then there will be pressure on central banks to actively manage debt yields by further QE purchases of government debt; this would help to suppress the rise in debt yields and so keep the total interest bill on greatly expanded government debt portfolios within manageable parameters. It is also the main alternative to a programme of austerity.**

## INTEREST RATE FORECASTS

**Brexit.** The interest rate forecasts provided by Link in paragraph 3.3 were predicated on an assumption of a reasonable agreement being reached on trade negotiations between the UK and the EU by 31.12.20. There is therefore no need to revise these forecasts now that a trade deal has been agreed. Brexit may reduce the economy's potential growth rate in the long run. However, much of that drag is now likely to be offset by an acceleration of productivity growth triggered by the digital revolution brought about by the COVID crisis.

### The balance of risks to the UK

- The overall balance of risks to economic growth in the UK is probably now skewed to the upside, but is still subject to some uncertainty due to the virus and the effect of any mutations, and how quick vaccines are in enabling a relaxation of restrictions.
- There is relatively little UK domestic risk of increases or decreases in Bank Rate and significant changes in shorter term PWLB rates. The Bank of England has effectively ruled out the use of negative interest rates in the near term and increases in Bank Rate are likely to be some years away given the underlying economic expectations. However, it is always possible that safe haven flows, due to unexpected domestic developments and those in other major economies, could impact gilt yields, (and so PWLB rates), in the UK.

### Downside risks to current forecasts for UK gilt yields and PWLB rates currently include:

- **UK government** takes too much action too quickly to raise taxation or introduce austerity measures that depress demand in the economy.
- **UK - Bank of England** takes action too quickly, or too far, over the next three years to raise Bank Rate and causes UK economic growth, and increases in inflation, to be weaker than we currently anticipate.
- A resurgence of the **Eurozone sovereign debt crisis**. The ECB has taken monetary policy action to support the bonds of EU states, with the positive impact

most likely for “weaker” countries. In addition, the EU agreed a €750bn fiscal support package. These actions will help shield weaker economic regions for the next two or three years. However, in the case of Italy, the cost of the virus crisis has added to its already huge debt mountain and its slow economic growth will leave it vulnerable to markets returning to taking the view that its level of debt is unsupportable. There remains a sharp divide between northern EU countries favouring low debt to GDP and annual balanced budgets and southern countries who want to see jointly issued Eurobonds to finance economic recovery. This divide could undermine the unity of the EU in time to come.

- Weak capitalisation of some **European banks**, which could be undermined further depending on extent of credit losses resultant of the pandemic.
- **German minority government & general election in 2021.** In the German general election of September 2017, Angela Merkel’s CDU party was left in a vulnerable minority position dependent on the fractious support of the SPD party, as a result of the rise in popularity of the anti-immigration AfD party. The CDU has done badly in subsequent state elections but the SPD has done particularly badly. Angela Merkel has stepped down from being the CDU party leader but she will remain as Chancellor until the general election in 2021. This then leaves a major question mark over who will be the major guiding hand and driver of EU unity when she steps down.
- **Other minority EU governments.** Austria, Sweden, Spain, Portugal, Netherlands, Ireland and Belgium also have vulnerable minority governments dependent on coalitions which could prove fragile.
- **Austria, the Czech Republic, Poland and Hungary** now form a strongly anti-immigration bloc within the EU, and they had threatened to derail the 7 year EU budget until a compromise was thrashed out in late 2020. There has also been a rise in anti-immigration sentiment in Germany and France.
- **Geopolitical risks**, for example in China, Iran or North Korea, but also in Europe and other Middle Eastern countries, which could lead to increasing safe haven flows.

#### **Upside risks to current forecasts for UK gilt yields and PWLB rates**

- **UK** - a significant rise in inflationary pressures e.g. caused by a stronger than currently expected recovery in the UK economy after effective vaccines are administered quickly to the UK population, leading to a rapid resumption of normal life and return to full economic activity across all sectors of the economy.
- The **Bank of England is too slow** in its pace and strength of increases in Bank Rate and, therefore, allows inflationary pressures to build up too strongly within the UK economy, which then necessitates a rapid series of increases in Bank Rate to stifle inflation.

### 5.3 TREASURY MANAGEMENT PRACTICE – CREDIT AND COUNTERPARTY RISK MANAGEMENT

**SPECIFIED INVESTMENTS:** All such investments will be sterling denominated, with **maturities up to a maximum of 1 year**, meeting the minimum ‘high’ quality criteria where applicable.

**NON-SPECIFIED INVESTMENTS:** These are any investments which do not meet the specified investment criteria. The Council will not engage in any non-specific investments.

It should be noted that any funding provided to East Cambridgeshire Trading Company is given as a loan and treated as capital expenditure. It is **not** an investment, although clearly the Council does receive a return on the amount borrowed.

#### SPECIFIED INVESTMENTS

A variety of investment instruments will be used, subject to the credit quality of the institution, and depending on the type of investment made, it will fall into one of the above categories.

The criteria, time limits and monetary limits applying to institutions or investment vehicles are:

	Minimum credit criteria / colour band	** Max % of total investments / £ limit per institution	Max. maturity period
DMADF – UK Government	yellow	£6 million	6 months (max. is set by the DMO*)
UK Government gilts	yellow	£5 million	5 years
UK Government Treasury bills	yellow	£5 million	364 days (max. is set by the DMO*)
Bonds issued by multilateral development banks	yellow	£5 million	5 years
Money Market Funds - CNAV	AAA	£5 million	Liquid
Money Market Funds - LNNAV	AAA	£5 million	Liquid
Money Market Funds - VNAV	AAA	£5 million	Liquid
Local authorities	yellow	£5 million	12 months



Term deposits with banks and building societies	Blue Orange Red Green No Colour	£6 million £6 million £6 million Nil Nil	12 months 12 months 6 months 100 days Not for use
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\* DMO – is the Debt Management Office of H. M. Treasury

**Accounting treatment of investments.** The accounting treatment may differ from the underlying cash transactions arising from investment decisions made by this Council. To ensure that the Council is protected from any adverse revenue impact, which may arise from these differences, we will review the accounting implications of new transactions before they are undertaken.

#### 5.4 APPROVED COUNTRIES FOR INVESTMENTS

This list is based on those countries which have sovereign ratings of AA- or higher, (we show the lowest rating from Fitch, Moody's and S&P) and also, (except - at the time of writing - for Hong Kong, Norway and Luxembourg), have banks operating in sterling markets which have credit ratings of green or above in the Link credit worthiness service.

##### ***Based on lowest available rating***

###### AAA

- Australia
- Denmark
- Germany
- Luxembourg
- Netherlands
- Norway
- Singapore
- Sweden
- Switzerland

###### AA+

- Canada
- Finland
- U.S.A.

###### AA

- Abu Dhabi (UAE)
- France

###### AA-

- Belgium
- Hong Kong
- Qatar
- **U.K.**

## **5.5 TREASURY MANAGEMENT SCHEME OF DELEGATION**

### **(i) Full Council**

- receiving and reviewing reports on treasury management policies, practices and activities;
- approval of annual strategy.

### **(ii) Finance and Assets Committee (as the responsible body)**

- approval of/amendments to the organisation's adopted clauses, treasury management policy statement and treasury management practices;
- budget consideration and approval;
- approval of the division of responsibilities;
- receiving and reviewing regular monitoring reports and acting on recommendations;
- approving the selection of external service providers and agreeing terms of appointment.

### **(iii) The Finance Manager and Section 151 Officer (as the person responsibility for treasury scrutiny)**

- reviewing the treasury management policy and procedures and making recommendations to the responsible body.

## 5.6 THE TREASURY MANAGEMENT ROLE OF THE SECTION 151 OFFICER

### The S151 (responsible) officer

- recommending clauses, treasury management policy/practices for approval, reviewing the same regularly, and monitoring compliance;
- submitting regular treasury management policy reports;
- submitting budgets and budget variations;
- receiving and reviewing management information reports;
- reviewing the performance of the treasury management function;
- ensuring the adequacy of treasury management resources and skills, and the effective division of responsibilities within the treasury management function;
- ensuring the adequacy of internal audit, and liaising with external audit;
- recommending the appointment of external service providers,
- preparation of a capital strategy to include capital expenditure, capital financing, and treasury management,
- ensuring that the capital strategy is sustainable, affordable and prudent in the long term and provides value for money,
- ensuring that due diligence has been carried out on all treasury and non-financial investments and is in accordance with the risk appetite of the authority,
- ensure that the authority has appropriate legal powers to undertake expenditure on non-financial assets and their financing,
- ensuring the proportionality of all investments so that the authority does not undertake a level of investing which exposes the authority to an excessive level of risk compared to its financial resources,
- ensuring that an adequate governance process is in place for the approval, monitoring and on-going risk management of all non-financial investments and long term liabilities,
- provision to members of a schedule of all non-treasury investments including material investments in subsidiaries, joint ventures, loans and financial guarantees,
- ensuring that members are adequately informed and understand the risk exposures taken on by an authority,
- ensuring that the authority has adequate expertise, either in house or externally provided, to carry out the above,
- creation of Treasury Management Practices that specifically deal with how non-treasury investments will be carried out and managed.

**REVENUE BUDGET, CAPITAL STRATEGY AND COUNCIL TAX 2021/22**

Committee: Finance & Assets Committee

Date: 25<sup>th</sup> January 2021

Author: Finance Manager

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1 **ISSUE**

1.1 This report sets out the Council's proposed revenue budget, capital strategy, and the required level of Council Tax in 2021/22. The report assesses the robustness of the budgets, the adequacy of reserves and up-dates the Council's Medium Term Financial Strategy (MTFS).

2 **RECOMMENDATIONS**

2.1 To recommend to Full Council to approve:

- The draft revenue budget for 2021/22 and MTFS for 2022/23 to 2024/25 as set out in Appendix 1
- A Council Tax freeze in 2021/22.
- The Statement of Reserves as set out in Appendix 2.
- The 2020/21 Fees and Charges as set out in Appendix 3.
- The Capital Strategy and financing as set out in Appendix 4.

2.2 To approve, that as we are still awaiting final Settlement figures and the completion of the NNDR1, should the numbers change between Finance and Assets Committee and Full Council, that the Finance Manager, in conjunction with the Chairman of Committee, adjust the use of the Surplus Savings Reserve in 2021/22 (as necessary) so that the net budget and Council Tax for that year remain unchanged.

3 **BACKGROUND / OPTIONS**

3.1 At the Full Council meeting on 20<sup>th</sup> February 2020, members approved a net budget for 2020/21 of £8,925,664 and a frozen Council Tax. The budget had a planned draw of £1,291,541 from the Surplus Savings Reserve. The Medium Term Financial Strategy at that time showed a balanced budget in 2021/22 (using further resources from the Surplus Savings Reserve), but with then significant budget deficits in 2022/23 and 2023/24.

3.2 Since this time, Finance and Assets Committee on the 23<sup>rd</sup> July 2020, approved a further £100,000 draw from the Surplus Savings Reserve in 2020/21, this to fund the Council's Environment and Climate Change Strategy.

3.3 The outturn position for 2019/20 was reported to the Finance and Assets Committee on the 23<sup>rd</sup> July 2020. This showed that due to the proactive actions taken by management to reduce the Council's cost base prior to and during 2019/20, the Council underspent in 2019/20 by £1,690,450. This was transferred into the Surplus Savings Reserve.

3.4 Management has continued to reduce the Council's cost base during the current financial year. This work has led to further one-off and on-going savings being made; which both contribute to the projected outturn underspend for this financial year and also provide savings throughout the term of the MTFs. The current yearend forecast underspend for 2020/21 is £428,500, this too will be transferred to the Surplus Savings Reserve at yearend and has been reflected in the figures in this report.

#### 4 SPENDING ROUND 2020

4.1 Local Government was expecting a major change in the way it is funded by Government in 2021/22. At this time last year we were expecting a:

- Spending Review, a major review by Government of all of its spending plans, determining the quantum of funding that will be made available to each Department for a number of years.
- Local Government Funding Review, a review of the relative needs of all local authorities to determine how much of the funding allocated above, would be allocated to each individual authority.
- Business Rates Retention Scheme revision, which would result in local authorities retaining 75% of Business Rates collected, rather than the current 50%; but at the same time some direct grants paid to councils by Government, such as Revenue Support Grant and Rural Services Delivery Grant would be withdrawn.

4.2 This had already been postponed once, it had originally been planned for 2020/21, but on the 25<sup>th</sup> November 2020, Government confirmed that it would be postponed for a second time, announcing instead a further one year Spending Round to cover the 2021/22 financial year. In arriving at this decision Government had considered the impact of the Covid-19 pandemic on the Country and believed that in the short term that its primary aim should be "to support councils in dealing with the immediate impacts of the pandemic, to promote recovery and renewal at local level". These would now take place in 2021, to be implemented for the 2022/23 financial year.

4.3 Instead they announced they planned to implement a second one-year Spending Round, which would in many cases "roll forward" the current year's settlement into 2021-22, this to provide certainty and stability into the local government sector.

#### 5 PROVISIONAL LOCAL GOVERNMENT FINANCE SETTLEMENT

5.1 The Provisional Local Government Finance Settlement was announced on the 17<sup>th</sup> December 2020.

- 5.2 The Settlement confirmed the extension to the previous year's funding settlement, rolling over the previous funding schemes either in cash terms or increased in line with Consumer Price Index inflation.
- 5.3 The Revenue Support Grant figure was one of those increased in line with the Consumer Price Index inflation, which has resulted in us getting a small increase in cash terms. In 2020/21 we received £11,764, which increased to £11,829 for 2021/22.
- 5.4 The Settlement made a further change in the awarding of New Homes Bonus grant. The scheme was extended by a further year, with amounts earned in year 11 of the scheme, between October 2019 and October 2020, attracting reward for one-year only in 2021/22. Prior to 2020/21 awards had been for four years, and this continues for those awarded prior this year, but for 2020/21 and 2021/22 there is only one year of award. What this therefore means is that we received four years of reward in 2020/21, but this reduces to three years in 2021/22 and one year in 2022/23. The current expectation is that the grant will be discontinued at this time, but, like all other funding sources in local government, this will be wrapped up within the Local Government Funding Review. There is a view that Government remain committed to incentivising housing growth, but the exact form of this is unclear and there appears to be a growing view that New Homes Bonus is not the answer and they would prefer something more "targeted".
- 5.5 That said, due to the continued high level of house building in the District in the past year, our New Homes Bonus grant for 2021/22 is forecast to be £540,959, this is a decrease of £154,278 when compared to that received in 2020/21.
- 5.6 The Settlement includes details of other specific grants that are being rolled forward, including the Rural Services Delivery grant, an allocation to the most rural authorities, which amounts to £169,586 in 2020/21 (£161,606 was received in 2020/21); Housing Benefit administration grant of £150,090 (a reduction of £16,677 compared to 2020/21) and Council Tax administration grant £66,838 (this is the same as in 2020/21).
- 5.7 The Government also announced a number of new grants for 2021/22, two of which related to financial support during the current Covid-19 pandemic. These were a general non-ring fenced grant of £380,516 and a grant specifically to compensate councils for the anticipated reduction in Council Tax as a consequence of more residents being on the Local Council Tax reduction scheme. This amounted to £82,754.
- 5.8 A further new grant for 2021/22 was the Lower Tier grant awarded to all lower tier authorities responsible for homelessness, planning, recycling and refuse collection, and leisure services; East Cambs were awarded £105,024 of this new grant.
- 5.9 The Settlement further identified the local authorities who will have Business Rates Pools during 2021/22, Cambridgeshire was amongst those councils (see paragraph 6.3).
- 5.10 The Settlement makes provision for shire districts to increase Council Tax by up to 2% or £5, whichever is the greater, in 2021/22 without the need for a referendum. To

put a value on this, if we were to increase Council Tax by £5 in 2021/22 (this is the higher figure for us), this would generate additional income of £149,650 in that year.

- 5.11 The Business Rate Retention Scheme continues as previously operated, with the Baseline Funding Level left unchanged from 2020/21.
- 5.12 The Business Rate multipliers were also announced in the Settlement, with a decision being made to freeze these at 2020/21 levels. The small business non-domestic multiplier will therefore remain at 49.9 pence and the multiplier for larger businesses (rateable values greater than £51,000) will be 51.2 pence.

## 6 BUSINESS RATES

- 6.1 The NNDR 1 return for 2020/21 will be produced by the end of January in line with statutory requirements. Figures from this will be included in the draft budget that will be presented to Full Council.
- 6.2 While the Council benefits significantly from the growth in Business Rates since the last Base reset in 2013, there is always a risk that appeals against Business Rates can be lodged and, if successful, can be backdated for several years. The Council does therefore include a provision for appeals in determining how much of the rates collected should be posted into the budget.
- 6.3 East Cambridgeshire applied to be, and was accepted by Government, to be part of a continuing Business Rate Pool in 2021/22, alongside a number of other authorities in Cambridgeshire.
- Cambridgeshire County Council
  - Cambridgeshire Fire Authority
  - Fenland District Council
  - Peterborough City Council
  - South Cambridgeshire District Council

(Cambridge City Council and Huntingdonshire District Council are not members of the Pool.)

A review of the scheme was undertaken in the Autumn of 2020, supported by Pixel Financial Management, when it was forecast that this Pool will continue to provide benefit to this authority in 2021/22, despite the potential impact of the Covid-19 pandemic on Business Rates receipts.

- 6.4 As highlighted elsewhere in this report, forecasts for retained Business Rates beyond 2021/22 are almost impossible at this time, but the figures presented take a prudent view, showing a significant reduction on those expected in 2021/22. These have also been informed by our external adviser Pixel Financial Management.
- 6.5 The Government have not yet announced any potential Business Rate reliefs or other changes for 2021/22. Last year these were announced at the end of January, so if anything is announced, these will be noted in the report for Full Council.



## 7 THE 2021/22 BUDGET

7.1 Due to the proactive actions taken by management to reduce costs and generate new sources of funding in recent years, the revenue budgets for 2021/22 is fully funded; but there is a small budget gap in 2022/23 and then significant budget deficits in 2023/24 and subsequent years which will need to be addressed.

7.2 The draft budget for 2021/22 is set out in Appendix 1 to this report.

7.3 The following key assumptions have been made in preparing the draft budget:

- No inflation has been added to staff pay in line with the Government announcement to freeze public sector pay in 2021/22 (it should be noted that Government hasn't actually got the power to do this, it is decided by the National Joint Council, but in previous years when a freeze has been announced, they have followed this guidance);
- Inflation on other expenditure has only been included where there is a contractual inflationary increase for example utilities and insurance. 2% has been added to the Waste contract with East Cambs Street Scene (ECSS). Other budgets have not been increased by inflation;
- The additional market premium being paid to Amey for the use of the Material Recycling Facility (MRF) has now been moved to ECSS to manage on the Council's behalf;
- Pension Fund revaluations take place every three years, with the last one being on the 31<sup>st</sup> March 2019, no change in rate will therefore be implemented in 2021/22 with the Council's contribution rate remaining at 17.2%, with in addition, the lump sum contribution remaining at £485,000 each year;
- The Housing Benefit budget reflects the latest information from Anglia Revenues Partnership (ARP) this at mid-year 2020;
- The Leisure Centre budget remains in line with the original funding strategy; that it should be revenue cost neutral. The MRP costs associated with the Leisure Centre project are being fully met in 2021/22 from the management fee to be paid to the Council by the operator. Additional management fee received over that needed to cover the debt and running costs of the Leisure Centre will be put into a "sinking fund" to ensure that money is available for future maintenance and repairs at the Centre.
- The Council will receive interest receipts from the new loan to East Cambs Trading Company (ECTC), these at an agreed rate of 3.5%.

## 8 RESERVES

8.1 The Council holds reserves, at levels which remain prudent. It is important to review the level of reserves on a regular basis, in particular to ensure that potential liabilities not in the Council's base budget can be funded from earmarked reserves; and that unearmarked reserves are at a sufficient level to cover any unforeseen events.

8.2 As part of the process of preparing this budget, officers have reviewed each reserve to ensure its purpose and level is appropriate. A Statement of Reserves is attached at Appendix 2.

8.3 The sole unearmarked reserve is the General Fund. This stands at £1,045,629. There is no statutory minimum level set for a local authority's reserves; it is a matter for each

local authority's own judgement after taking into consideration the strategic, operational and financial risks it faces. It has been this authority's policy for some time that the level of the unearmarked reserve be set at 10% of their net operating budget, this is a reasonably prudent approach and a higher percentage than many other authorities locally. The proposed net operating budget for 2021/22 is £10,520,847. Using the 10% figure, this would therefore require an unearmarked reserve of £1,052,845. It is therefore recommended that an additional £6,456 be put into the General Fund, this being a transfer from the Change Management, rather than a draw from Council Tax.

## 9 FEES AND CHARGES

- 9.1 Officers have reviewed the fees and charges, and details of the proposals are shown at Appendix 3. The proposed budgets include increases as a result of both volume and price.
- 9.2 There have been no new fees or charges introduced for 2021/22.
- 9.3 Where we have control over the fee level, as opposed to where these are negotiated nationally, it is proposed to increase fees and charges by approximately 2%. This approach ensures that the additional cost of providing the service is met by the person / organisation benefiting from the service, rather than the general populous through Council Tax.
- 9.4 As external funding from Government grants continues to reduce, the Council's approach to fees and charges will need to reflect the increasing importance of this as an income source.

## 10 CAPITAL STRATEGY

- 10.1 The CIPFA revised 2017 Prudential and Treasury Management Codes required from 2019/20 all local authorities to prepare a capital strategy report, which provides:
- a high level long term overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services;
  - an overview of how the associated risk is managed;
  - the implications for future financial sustainability.
- 10.2 This Council has no long term capital objectives at this time. The medium term capital programme has been reviewed, and is attached at Appendix 4. The programme is largely a continuation of the previous programme. The total value of the programme in 2021/22 is £3,827,249.
- 10.3 The Council's Treasury Management Strategy is a separate document, which is also on today's agenda for review and hopefully to be passed onto Full Council for approval.
- 10.4 With the Council's Waste Service now being provided by East Cambs Street Scene (ECSS), the Council is purchasing waste fleet and hiring this to the Company. The hire charge reflecting the Council's capital costs of doing this, both the minimum revenue provision (MRP) and interest costs. Spend in 2021/22 is forecast at £2 million as vehicles previously purchased by the use of the Weekly Collection Grant from

Government, reach the end of their useful life and require replacing. It had previously been planned to change these vehicles in 2020/21, but with the Government due to announce its Waste Strategy in Spring 2021, it has been deemed more sensible to wait to ensure that the vehicles purchased meet the new needs proscribed in this strategy. It is also hoped that Government funding may become available at the same time. While these additional costs will be reflected in the charge to ECSS, the Council will need to increase the contract value it pays the Company for providing the service as detailed in paragraph 13.4 to ensure that it can meet these additional costs.

- 10.5 The project to refurbish the depot has been deferred into 2021/22, while further feasibility work takes place and costings of the project reviewed. At this time the budget originally put in for 2018/19 remains in place, but potentially this will need to be adjusted as new information comes to hand.
- 10.6 Two new capital provisions have been built into the 2021/22, these are both for £40,000 and relate to the purchase of new wheeled bins, as further residential properties are built within the District, these need to be supplied with bins, so the Council needs to have these available. The cost of these will be covered by a combination of Section 106 funding or capital receipts.
- 10.7 The other new provision is for the Council's contribution to the A14 up-grade. When the scheme was originally designed, and funding agreed, it was agreed that all councils within Cambridgeshire would contribute to the costs, this contribution is expected to start in 2021/22 and will be funded from CIL contributions.
- 10.8 The other two areas of capital spend in the capital programme are the on-going provision of Disabled Facilities, both mandatory and discretionary. The Council receives Government funding (from the Better Care Fund), via the County Council to assist with the funding of this work. The total budget in 2021/22 is £772,299, with £526,577 being funded by grant, with the remainder (£245,722) being funded by the Council by the use of previously obtained capital receipts. And vehicle replacement funding for the Parks and Gardens team, these vehicles are purchased by the Council using Section 106 funding, and then hired to ECTC at a commercial rate.
- 10.9 The Council previously held cash balances which were invested in short and fixed term deposits, however as agreed in the 2017/18 budget, these are now being deployed to fund the expenditure on the Leisure Centre, Waste fleet and the loan to the ECTC. The current expectation is that external borrowing will not be required in 2021/22 although this situation will be constantly monitored during the year. More details of the borrowing requirement and the Council's investments are detailed in the Treasury Management Strategy (also on the agenda for this meeting).
- 10.10 The original loan arrangements with ECTC were that the loans must be repaid within five years (by March 2021). It has been agreed with our External Auditors that the Council does not need to make any annual revenue provision to repay these loans in the short-term, but simply use the Company's repayment to repay the Council's borrowing. These loans will be repaid on 31<sup>st</sup> March 2021 in line with this agreement.
- 10.11 Council has agreed to offer ECTC two new loan facility from the 31<sup>st</sup> March 2021, these up to a cumulative value of £4,900,000 and at an interest rate of 3.5%. As with the previous loans, officers will monitor the Company's finances, to ensure that these remain robust and the expectation remains that funding will be available in 2023 to

repay these loans. As long as this remains the case, in line with the agreement for the original loans, the Council will not be required to set aside annual revenue provisions, however if at any point it was felt that the loan repayment could be in doubt, the Council would be expected to make provision for any expected shortfall in the year that this became known.

10.12 In summary therefore, the Council has limited exposure to the on-going costs of capital expenditure at this time. The costs of the Leisure Centre are being met by the operator through the management fee; the loans to ECTC will be repaid in full in 2023 and in the intervening period a commercial interest rate is being charged, and the costs of the Waste fleet and some of the costs of the depot enhancements will be passed onto ECSS, although the Council's revenue budget has been increased to reflect the replacement of the vehicles reaching the end of their useful life in 2021/22.

## 11 COUNCIL TAX

11.1 The MTFs assumed that the Collection Fund for Council Tax would be in balance as at 31<sup>st</sup> March 2021. However, an increased number of houses being built in the District have resulted in a forecast surplus as at 31<sup>st</sup> March 2021, of which £17,198 will come as income to this Council. In line with new rules for the 2020/21 surplus / deficit agreed by Government to assist councils recover from the pandemic, this will be built into the budget over 3 years, rather than only the one in previous years.

11.2 The taxbase for 2021/22 estimated in last year's budget was an equivalent of 30,550.6 Band D properties. However, the real change in housing between October 2019 and October 2020 and an estimation of future movements in 2021/22 means that the current forecast for 2021/22 is 29,930.0 Band D properties. This is lower than last year, mainly as a consequence of the Covid-19 pandemic, which is forecast to lead to higher unemployment, which in-turn, will result in more residents claiming Local Council Tax Reduction Support. Residents who claim this benefit, can pay a minimum of 8.5% of their Council Tax bill. These reductions in income to be collected are reflected within the taxbase figure resulting in the reduced forecast.

11.3 It is proposed that the Council freezes its Council Tax for a Band D property at the current level of £142.14 in 2021/22, based on the Council Tax requirement of £4,254,250 divided by the taxbase of 29,930.0 properties. This decision is made as Council doesn't want to put further pressure of the finances of its residents in these unprecedented times.

11.4 The County Council, Fire and Police Authority budgets and precepts will be considered by their respective decision making bodies in early February and we will be notified of their precept requirements in time for Full Council.

11.5 Appendix 5 details the parish precepts notified to the Council at the point this agenda was dispatched. The deadline for these being returned was the 18<sup>th</sup> January 2021; an up-date will be provided to Committee of any outstanding on the day of the meeting.

## 12 RISK AND SENSITIVITY ANALYSIS

12.1 The Local Government Act 2003 places two specific requirements on an authority's Section 151 Officer in determining the Council's budget and Council Tax. Under

section 25, the Section 151 Officer must advise on the robustness of the estimates included in the budget. The advice given to the Council on these issues is that the estimates have been produced on a prudent basis, with a strong emphasis on ensuring all cost pressures are included. Budget estimates have been developed with senior officers, with regular updates and discussions with members of Management Team.

- 12.2 The key risks are around funding of the Council. The Settlement provides clarity around grant funding for 2021/22, but looking beyond that, there is very limited information to put forward a MTFS based on confident assumptions on future Government funding. The risks from 2022/23 are significant; there is limited information on likely sources of funding and indeed the value of any funding to be received.
- 12.3 The Government has announced that it intends for local authorities to retain 75% of all business rates generated in 2022/23 - but there will continue to be the need to share resources across the Country - and there will also be additional new burdens placed on local authorities, which are unclear at this time.
- 12.4 Possibly the greatest concern for this Council however, is that plans suggests that Government intend to implement a full Business Rate baseline reset in 2022/23. The current baseline was set in 2013, when all councils were given a share of Business Rates equal to their needs. Since then councils have been allowed to keep a share of their growth, which for us as a district council has been 40%. In broad figures our baseline is £2.5 million, where we actually budget for £3.5 million of Business Rates because of this growth. If the baseline is fully reset, we will lose all of the growth, and wouldn't know what our revised baseline will be until the results of the Local Government Funding Review (as detailed in 4.1) is known. An allowance has been made in the MTFS for this probable reduction, but at this point, there is no certainty on what this is likely to be.
- 12.5 To mitigate the above risk, the Section 151 Officer will continue to report on a frequent basis to Management Team and members as new information becomes available.
- 12.6 The Section 151 Officer is also required to report on the adequacy of reserves. The projected level of reserves, specifically the General Fund Reserve and Surplus Savings Reserve, and their use in 2021/22 are **prudent** and show how these will sustain the functions of the Council in that year.
- 12.7 However, the budget for 2022/23 assumes the remainder of the Surplus Savings Reserve is utilised, which will reduce the overall levels of reserves significantly. Reserves can only be utilised once and while the purpose of the Surplus Savings Reserve is to provide one-off funding to balance the budget in future years, the Council needs to be considering all options to reduce the speed that these are utilised so that they remain available further into the future. The Council has a track record of delivering additional savings and generating extra income in advance of the budget requirement, so work done during 2021/22 will hopefully lead to a reduced draw from the Surplus Savings Reserve in that and later years through the MTFS period.
- 12.8 Another key risk around reserves is the risk exposure the Council has with its loan funding of ECTC. Should ECTC encounter any financial difficulties and be unable to repay the £4,900,000 loan made available to it, then the Council will need to account

for this within its financial statements. In such an event, the Council would need to draw on its reserves to meet such a liability. At this point, however, there is no indication that this is likely to be the case.

### 13 MEDIUM TERM FINANCIAL STRATEGY

13.1 The Council's Medium Term Financial Strategy is to set a robust financial framework for the Council's plans over the next four years which support the delivery of the Council's priorities within a context of an annual balanced budget. Specifically, the MTFS:

- Looks to the longer term to help plan sustainable services within an uncertain external economic and funding environment;
- Maximises the Council's financial resilience and manage risk and volatility, including managing adequate reserves;
- Helps ensure that the Council's financial resources are directed to support delivery of the Council's priorities over the medium term.

13.2 The MTFS covers the period 2021/22 to 2024/25. As highlighted earlier the Spending Round announced by Government for 2021/22 provides assurance about the grant position for that year and these figures can therefore be considered robust.

13.3 However, it is extremely difficult to develop a robust MTFS to cover the period 2022/23 and beyond while the uncertainties around future funding levels remain. As detailed earlier in this report, the Government is currently undertaking a number of pieces of work which will impact on local government funding moving forward. The Spending Review, will determine the quantum of funding available to local government, while the Local Government Funding Review will determine how much of this funding is allocated to each individual authority. Then further Government intend to change the Business Rate retention scheme in 2022/23 to allow local government to retain 75% of the amount collected, rather than the current 50%. These issues create considerable uncertainty for local authority funding; and is an issue which will require monitoring; this so that the Council can adjust its MTFS as new information becomes available. Further up-dates will be provided to Council as further information becomes available.

13.4 The assumptions used in the MTFS include:

- Government funding through Revenue Support Grant and Rural Services Grant end in 2021/22;
- New Homes Bonus (NHB) remains part of the overall funding package from Government for the next two years, before being removed. However, while remaining in the funding package, the benefit of NHB reduces considerably over this period, before being stopped completely in 2023/24 (see paragraph 5.4);
- Inflation on staff pay is included at 2% in all future years
- 2% inflation is added to the Waste contract on an annual basis, however additional budget is provided from 2022/23 when new recycling vehicles will be purchased. The vehicles purchased by the Council using the weekly collection grant from Government will reach the end of their useable life in 2020/21 so will need to be replaced, adding this additional cost. (This cost increase would have occurred regardless of whom is undertaking the contract at this point);

- The new loans to ECTC are planned to be repaid in 2023, the interest received by the Council on this loan will therefore stop at this point. The loan repayment will be used to reduce / prevent the Council needing to borrow externally, therefore reducing costs, albeit not to the magnitude that income will be lost;
- The Council has a track record of delivering cost reductions; it is anticipated therefore that a contribution to the budget deficit forecast in future years will be achieved during the term through general efficiencies and income generating opportunities; however, to be prudent, no account of these are shown within the forecasts within this report.
- Further, while ECTC is anticipated to start making profits in the period of the MTFS, it remains unclear how much of this will need to be retained by the Company as working capital, so at this point, no account of this income being paid to the Council as a dividend is assumed in the budget. (While noting that no dividends are budgeted for, it should not be forgotten that the Council continues to get significant benefits from ECTC, with interest being paid on the loans provided at a rate far higher than available from its investments, the recharge of management and support services costs to the Company (forecast to be £85,835 in 2021/22), the hire of the Market Place and part of the depot, as well as Capital Receipts, Section 106 contributions and eventually additional Council Tax receipts from the properties developed.)

13.5 The impact of the above assumptions is attached at Appendix 1. This shows the budget for 2021/22 is fully funded. However, there is a relatively small gap in 2022/23 with then significant budget shortfalls projected in 2023/24 and subsequent years. Clearly many things will change between now and then, so members should not focus on the precise numbers. What is far more important is that members appreciate the direction of funding facing this and many local authorities, and the likely scale. It will be necessary to develop a plan to meet these shortfalls, although the Council does have time (although limited) to put the necessary plans in place. The Council also has access to a reasonable level of reserves, as described in section 8 of this report.

13.6 While noting the uncertainty that is highlighted in this report about the 2022/23 financial year, it is considered unlikely that the quantum of funding from Government will increase and as such, this Council will need to identify measures to bridge the budget gap. A comparison between this year's MTFS and the past two last years does highlight an increasing need to identify savings in the medium term, to ensure that the Council's budget can be balanced in future years.

2019/20 Budget	
2019/20 – budget year	Balanced
2020/21 – MTFS year 1	Balanced
2021/22 – MTFS year 2	Savings to find £3,181,842
2022/23 – MTFS year 3	Savings to find £4,044,479
2020/21 Budget	
2020/21 – budget year	Balanced
2021/22 – MTFS year 1	Balanced
2022/23 – MTFS year 2	Savings to find £3,266,854
2023/24 – MTFS year 3	Savings to find £4,391,777
2021/22 Budget	
2021/22 – budget year	Balanced

2022/23 – MTFS year 1	£58,029
2023/24 – MTFS year 2	£4,550,332
2024/25 – MTFS year 3	£4,601,445

13.7 Options to resolve the budget shortfalls in future years come from:

- Efficiencies in the cost of service delivery
- Reductions in service levels
- Increased Council Tax
- Increased income from fees and charges
- Increased commercialisation via its trading companies

13.8 While noting the Council’s favourable position of having a balanced budget (by use of the Surplus Savings Reserve) for the first two years of the MTFS period, it is strongly recommended that early consideration is made to how savings in future years will be achieved. All the bullets above need to be considered, with a quickening of the pace of commercialisation and the review of all income generating opportunities, as these are potentially the areas that could generate the highest returns. However, within the MTFS period, all options will need to be considered and potentially implemented.

13.9 Any savings achieved in 2020/21, 2022/23 or 2023/24 resulting in potential underspends in those years, will provide further funding in the Surplus Savings Reserve to assist in the balancing of future years.

#### 14 ARGUMENTS / CONCLUSIONS

14.1 The proactive actions already taken have led to a balanced budget for 2021/22 (based on known information and the use of the Surplus Savings Reserve). The budget for 2021/22 therefore has minimal risks attached to it, although the Medium Term Financial Strategy and the new funding regime expected to come into place from 2022/23 do contain significant uncertainty and therefore risk. While there is little this Council can do to remove this uncertainty at this point, it does need to look for opportunities within its own control now, which will bridge some part of the funding gap currently forecast.

#### 15 FINANCIAL IMPLICATIONS

15.1 The proposed net operating budget of £10,520,847 will be financed by Revenue Support Grant, retained Business Rates, Council Tax and the Surplus Savings Reserve.



16 APPENDICES

- Appendix 1 - Draft Budget 2021/22 and MTFS
- Appendix 2 - Statement of Reserves
- Appendix 3 - Schedule of Fees and Charges
- Appendix 4 - Capital Programme
- Appendix 5 – Parish Precepts

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<u>Background Documents</u>	<u>Location</u>	<u>Contact Officer</u>
	Room 104 The Grange Ely	Ian Smith Finance Manager (01353) 616470 E-mail: <a href="mailto:ian.smith@eastcambs.gov.uk">ian.smith@eastcambs.gov.uk</a>

**DRAFT BUDGET 2021-22**

	Budget 2020-21 £	Estimate 2021-22 £	Estimate 2022-23 £	Estimate 2023-24 £	Estimate 2024-25 £
Committees:					
Operational Services	5,750,903	<b>5,813,223</b>	6,325,649	6,410,923	6,523,467
Finance & Assets	4,655,272	<b>5,312,912</b>	5,371,703	5,593,494	5,633,596
Net District Spending	10,406,175	<b>11,126,135</b>	11,697,352	12,004,417	12,157,063
New Homes Bonus Grant	-695,237	<b>-540,959</b>	-179,636	0	0
Rural / Lower Tier Services Grant	-161,606	<b>-274,610</b>	0	0	0
Covid-19 Grant	0	<b>-463,270</b>	0	0	0
Internal Drainage Board Levies	501,978	<b>512,018</b>	522,258	532,703	543,357
Contributions to / from Corporate Reserves	265,895	<b>161,533</b>	133,253	108,333	108,333
Net Operating Expenditure	10,317,205	<b>10,520,847</b>	12,173,227	12,645,453	12,808,753
Contribution from Surplus Savings Reserve	-1,391,541	<b>-2,137,168</b>	-3,962,275	0	0
Savings to be identified	0	<b>0</b>	-58,029	-4,550,332	-4,601,445
ECDC Budget Requirement	8,925,664	<b>8,383,679</b>	8,152,923	8,095,121	8,207,308
Parish Council Precepts	2,470,158	<b>2,524,650</b>	2,564,849	2,619,685	2,676,456
DISTRICT BUDGET REQUIREMENT	11,395,822	<b>10,908,329</b>	10,717,772	10,714,806	10,883,764
<u>Financed by:</u>					
Council's share of Collection Funds Surplus	-71,635	<b>26,133</b>	6,595	6,595	0
Revenue Support Grant	-11,764	<b>-11,829</b>	0	0	0
Locally retained Non-Domestic Rates	-3,876,316	<b>-3,469,005</b>	-3,205,594	-3,099,578	-3,155,165
Plus: NNDR from Renewable Energy	-674,728	<b>-674,728</b>	-674,728	-674,728	-674,728
COUNCIL TAX REQUIREMENT	6,761,379	<b>6,778,900</b>	6,844,045	6,947,095	7,053,871

	Estimate 2020-21 £	Estimate 2021-22 £	Estimate 2022-23 £	Estimate 2023-24 £	Estimate 2024-25 £
Unallocated Surplus Savings Reserve					
In hand at 1st April	7,017,799	<b>6,099,443</b>	3,962,275	0	0
Movement in year	-918,356	<b>-2,137,168</b>	-3,962,275	0	0
In hand at 31st March	6,099,443	<b>3,962,275</b>	0	0	0

IMPLIED BAND 'D' COUNCIL TAX (District only i.e. excluding parish levies)					
Demand on Collection Fund as above	6,761,379	<b>6,778,900</b>	6,844,045	6,947,095	7,053,871
Less Parish Precepts as above	2,470,158	<b>2,524,650</b>	2,564,849	2,619,685	2,676,456
	4,291,221	<b>4,254,250</b>	4,279,196	4,327,410	4,377,415
Council Tax Base	30,190.1	<b>29,930.0</b>	30,105.5	30,444.7	30,796.5
District Council Tax - Band D	142.14	<b>142.14</b>	142.14	142.14	142.14

Description	Estimate 2020/21	Estimate 2021/22	Estimate 2022/23	Estimate 2023/24	Estimate 2024/25
<b>Operational Services Committee</b>					
Building Regulations	27,520	17,696	17,485	17,268	17,048
Civic Amenities	11,428	11,671	11,848	12,028	12,212
Climate Change	100,000	100,000	100,000	100,000	100,000
Community Projects & Grants	221,578	179,585	181,059	182,563	184,097
Community Safety	50,834	57,002	57,823	58,660	59,514
Cons. Area & Listed Buildings	60,578	60,967	61,936	62,924	63,932
Customer Services	465,859	460,037	485,701	495,461	505,416
Dog Warden Scheme	34,512	34,443	34,924	35,415	35,916
Emergency Planning	28,088	28,374	28,665	28,962	29,265
Environmental	90,260	91,486	92,883	94,307	95,760
Environmental Health	407,059	410,201	417,852	425,655	433,615
Homelessness	372,074	343,080	377,997	387,092	396,368
Information Technology	801,156	795,280	836,192	847,292	858,584
Licencing - Env Services	-899	2,499	-5,646	-14,674	-24,666
Marketing & Grants	66,345	70,094	70,441	39,576	39,937
Nuisances	70,970	75,315	76,745	78,203	79,691
Parish Forums	1,500	1,500	1,500	1,500	1,500
Performance Management	10,400	10,400	10,400	10,400	10,400
Pest Control	9,090	9,341	9,519	9,700	9,885
Planning	-16,131	6,808	15,058	23,573	32,360
Public Relations	75,172	75,917	76,669	77,429	78,196
Recycling	952,785	1,026,200	1,382,348	1,413,639	1,439,992
Refuse Collection	1,177,951	1,201,511	1,225,541	1,250,052	1,275,053
Renovation Grants	0	0	0	0	0
Street Cleansing	689,469	703,258	717,323	731,669	746,302
Street Naming & Numbering	7,896	6,841	6,895	6,949	7,005
The Old Gaol House	0	0	0	0	0
Travellers Sites	-20,000	-22,000	-22,000	-22,000	-22,000
Tree Preservation / Landscaping	55,409	55,717	56,491	57,280	58,085
	<b>5,750,903</b>	<b>5,813,223</b>	<b>6,325,649</b>	<b>6,410,923</b>	<b>6,523,467</b>
<b>Finance &amp; Assets Committee</b>					
Asset Management	141,918	141,918	141,918	141,918	141,918
Award Ditches	8,829	9,006	9,186	9,370	9,557
Civic Relations	21,794	22,542	22,837	23,138	23,445
Closed Churchyards	29,086	29,668	30,261	30,866	31,483
Community Transport	15,000	15,000	15,000	15,000	15,000
Corp. Man. Policy Research / Review	170,724	272,796	174,912	177,077	179,294
Council Tax Collection Costs	422,337	423,191	442,046	459,912	473,527
Data Management	99,024	100,992	102,322	103,679	105,063
Economic Development	-13,155	31,649	36,585	41,620	46,753
Finance	335,662	349,836	356,656	363,612	370,705
General Gang	117,565	82,556	83,786	85,041	86,321
Health & Safety (Work)	22,280	22,566	22,857	23,154	23,457
Housing Benefits	373,717	351,605	376,387	399,760	409,569
Housing Strategy	210,597	231,970	239,140	246,452	253,913
Human Resources (including training)	186,883	209,337	201,500	203,707	205,957
Interest & Financial Transactions	-142,347	-31,859	-32,189	68,254	72,109
Internal Audit	70,855	72,822	74,278	75,764	77,280
Land Charges Admin	-59,353	-29,268	-30,703	-32,166	-33,659
Legal Services	221,889	240,531	244,825	249,205	253,672
Leisure Centre	-396,613	-240,113	-240,113	-240,113	-306,933
Local Elections	22,500	22,500	22,500	22,500	22,500
Local Plans	95,000	95,000	95,000	95,000	95,000
Management Team	296,018	393,816	492,777	502,394	512,203
Markets	0	0	0	0	0
Member & Committee Support	498,187	531,290	541,436	551,785	562,340
Misc. Financial Services	831,648	761,012	782,911	782,911	782,911
Miscellaneous Properties	-45,124	-45,907	-45,940	-45,973	-46,006
NNDR Collection Costs	42,040	45,170	49,725	54,097	56,485
Out Of Hours Service	15,000	12,000	12,240	12,485	12,735
Parking of Vehicles	-44,514	46,225	-16,606	-12,609	-8,533

Parks and Open Spaces	261,832	268,562	325,234	332,039	338,980
Payroll	63,485	65,665	66,854	68,066	69,302
Public Conveniences	150,988	154,013	156,631	159,305	162,029
Registration of Electors	53,371	53,371	53,371	53,371	53,371
Reprographics	111,559	116,170	117,379	118,611	119,869
Office Accommodation	355,278	354,203	356,465	362,847	369,360
Sport & Recreation Admin	111,312	133,077	90,235	91,415	92,619
	<b>4,655,272</b>	<b>5,312,912</b>	<b>5,371,703</b>	<b>5,593,494</b>	<b>5,633,596</b>
<b>Total</b>	<b>10,406,175</b>	<b>11,126,135</b>	<b>11,697,352</b>	<b>12,004,417</b>	<b>12,157,063</b>

## Reserve Accounts

Description	2020/21				2021/22			
	Opening Balance 1 April	Transfers to Reserve	Contributions from Reserve	Forecast Balance 31 March	Opening Balance 1 April	Transfers to Reserve	Contributions from Reserve	Forecast Balance 31 March
	£	£	£	£	£	£	£	£
District Elections	0	22,500		22,500	22,500	22,500		45,000
Historic Buildings Grants	6,190			6,190	6,190			6,190
Housing Conditions Survey	40,000	5,000		45,000	45,000	5,000		50,000
Building Control	23,155			23,155	23,155			23,155
Change Management	236,744	12,479		249,223	249,223		(6,456)	242,767
Major Project Development	100,000			100,000	100,000			100,000
Surplus Savings Reserve	7,017,799	473,185	(1,391,541)	6,099,443	6,099,443		(2,137,168)	3,962,275
Vehicle Replacements	89,187			89,187	89,187			89,187
New Homes Bonus	44,685		(44,685)	0	0			0
Leisure Centre - sinking fund	(44,685)	44,685		0	0	79,127		79,127
Insurance	16,343			16,343	16,343			16,343
IT	40,000	40,000		80,000	80,000	10,000		90,000
CIL	3,219,091	3,800,000	(2,735,000)	4,284,091	4,284,091	1,200,000	(800,000)	4,684,091
CIL Admin	226,560	190,000	(100,000)	316,560	316,560	70,000	(100,000)	286,560
Care and Repair	45,000			45,000	45,000			45,000
Community Fund Reserves	14,884			14,884	14,884			14,884
Housing	79,547			79,547	79,547			79,547
Affordable Housing	346,150	66,360		412,510	412,510	53,200		465,710
General Fund Balance	1,045,629			1,045,629	1,045,629	6,456		1,052,085
Commercial Invest to Save	20,000			20,000	20,000			20,000
CLT Grant Applications	20,000			20,000	20,000			20,000
Travellers' Sites	4,357	27,634		31,991	31,991	40,762		72,753
Enterprise Zone NNDR	253,577	154,761	(46,428)	361,910	361,910	154,761	(46,428)	470,242
Economic Development	0			0	0			0
Business Rates Retention Pilot	0			0	0			0
Other								
Section 106 Agreements	2,267,451		(500,000)	1,767,451	1,767,451		(500,000)	1,267,451
Internal Borrowing	(11,760,859)	6,919,933	(6,337,077)	(11,178,003)	(11,178,003)	(2,945,950)	392,496	(13,731,457)
<b>Total Reserves</b>	<b>3,350,806</b>	<b>11,756,537</b>	<b>(11,154,731)</b>	<b>3,952,612</b>	<b>3,952,612</b>	<b>(1,304,144)</b>	<b>(3,197,556)</b>	<b>(549,088)</b>

## Reserve Accounts

Description	2022/23				2023/24			
	Opening Balance 1 April	Transfers to Reserve	Contributions from Reserve	Forecast Balance 31 March	Opening Balance 1 April	Transfers to Reserve	Contributions from Reserve	Forecast Balance 31 March
	£	£	£	£	£	£	£	£
District Elections	45,000	22,500		67,500	67,500	22,500		90,000
Historic Buildings Grants	6,190			6,190	6,190			6,190
Housing Conditions Survey	50,000	5,000		55,000	55,000	5,000		60,000
Building Control	23,155			23,155	23,155			23,155
Change Management	242,767		(165,238)	77,529	77,529		(47,222)	30,307
Major Project Development	100,000			100,000	100,000			100,000
Surplus Savings Reserve	3,962,275		(3,962,275)	0	0			0
Vehicle Replacements	89,187			89,187	89,187			89,187
New Homes Bonus	0			0	0			0
Leisure Centre - sinking fund	79,127	231,356		310,483	310,483	409,023		719,506
Insurance	16,343			16,343	16,343			16,343
IT	90,000	40,000		130,000	130,000	40,000		170,000
CIL	4,684,091	1,200,000	(800,000)	5,084,091	5,084,091	1,200,000	(800,000)	5,484,091
CIL Admin	286,560	70,000	(100,000)	256,560	256,560	70,000	(100,000)	226,560
Care and Repair	45,000			45,000	45,000			45,000
Community Fund Reserves	14,884			14,884	14,884			14,884
Housing	79,547			79,547	79,547			79,547
Affordable Housing	465,710	24,920		490,630	490,630			490,630
General Fund Balance	1,052,085	165,238		1,217,323	1,217,323	47,222		1,264,545
Commercial Invest to Save	20,000			20,000	20,000			20,000
CLT Grant Applications	20,000			20,000	20,000			20,000
Travellers' Sites	72,753	48,523		121,276	121,276	56,959		178,235
Enterprise Zone NNDR	470,242	154,761	(46,428)	578,575	578,575	154,761	(46,428)	686,908
Economic Development	0			0	0			0
Business Rates Retention Pilot	0			0	0			0
Other								
Section 106 Agreements	1,267,451		(500,000)	767,451	767,451		(500,000)	267,451
Internal Borrowing	(13,731,457)	0	4,718,557	(9,012,900)	(9,012,900)	0	1,478,557	(7,534,343)
<b>Total Reserves</b>	<b>(549,088)</b>	<b>1,962,298</b>	<b>(855,384)</b>	<b>557,825</b>	<b>557,825</b>	<b>2,005,465</b>	<b>(15,093)</b>	<b>2,548,197</b>

## EAST CAMBRIDGESHIRE DISTRICT COUNCIL

## FEES AND CHARGES SCHEDULE 2021-22

Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
<b><u>COMMUNITY SERVICES</u></b>				
<b>BUSINESS PARKING PERMIT SCHEME</b>				
First permit	SR	Discretionary	£50.00	£50.00
Second permit	SR	Discretionary	£55.00	£55.00
Third permit	SR	Discretionary	£60.00	£60.00
Fourth permit	SR	Discretionary	£70.00	£70.00
Market Traders	SR	Discretionary	£20.00	£20.00
<b>CAR PARKING – ANGEL DROVE, ELY</b>				
Cost per day (except Saturdays & Bank Holidays)	SR	Discretionary	£3.00	£3.00
Season Ticket – Weekly (6 days)	SR	Discretionary	£12.00	£12.00
Season Ticket – Quarterly	SR	Discretionary	£145.00	£145.00
Season Ticket – Annual	SR	Discretionary	£506.00	£506.00
<b>CAR PARKING – THE DOCK, ELY</b>				
Cost per day (except Saturdays & Bank Holidays)	SR	Discretionary	£3.00	£3.00
Season Ticket – Weekly (6 days)	SR	Discretionary	£12.00	£12.00
Season Ticket – Quarterly	SR	Discretionary	£145.00	£145.00
Season Ticket – Annual	SR	Discretionary	£506.00	£506.00
<b>CAR PARKING – LITTLEPORT STATION</b>				
<u>On-peak</u>				
Daily	SR	Discretionary	£1.80	£1.80
Weekly	SR	Discretionary	£5.70	£5.70
Quarterly	SR	Discretionary	£57.00	£57.00
Annual	SR	Discretionary	£205.00	£205.00
<u>Off-peak</u>				
Daily	SR	Discretionary	£0.50	£0.50
<b>FIXED PENALTY PARKING FINES</b>				
Excess Charge if paid within 14 days	OS	Discretionary	£50.00	£50.00
Excess Charge if paid after 14 days	OS	Discretionary	£60.00	£60.00
<b>ELY RIVERSIDE</b>				
Mooring Overstay Charge Notice - First 48 hours are free, with a charge applying after this period	SR	Discretionary	£100.00 (reduced to £70 if paid within 14 days)	£100.00 (reduced to £70 if paid within 14 days)

Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
<b><u>DEVELOPMENT SERVICES</u></b>				
<b>PLANNING PRE APPLICATION ADVICE</b>				
Householder Schemes – Extension or works to a dwelling - General Advice on issues is FREE but comment on a particular scheme would attract a fee - Written advice only	SR	Discretionary	£41.00	£42.00
Householder Schemes – Extension or works to a dwelling - General Advice on issues is FREE but comment on a particular scheme would attract a fee - Meeting Only	SR	Discretionary	£41.00	£42.00
Householder Schemes - Extension or works to a dwelling - General Advice on issues is FREE but comment on a particular scheme would attract a fee - Meeting and written advice	SR	Discretionary	£82.00	£84.00
Householder Schemes – Building Control Advice - Written advice only	SR	Discretionary	£22.50	£23.00
Householder Schemes – Building Control Advice - Meeting and written advice	SR	Discretionary	£44.00	£45.00
Householder Schemes – Heritage Advice – Written advice only	SR	Discretionary	£10.50	£10.70
Householder Schemes – Heritage Advice– Meeting only	SR	Discretionary	£10.50	£10.70
Householder Schemes – Heritage Advice– Meeting and written advice	SR	Discretionary	£20.50	£21.00
Householder Schemes – Follow Up Plan Checking	SR	Discretionary	FREE	FREE
Small Scale Minor Development – Residential schemes 1-2 dwellings. Other buildings up to 999sqm. Written Advice	SR	Discretionary	£147.00	£150.00
Small Scale Minor Development – Residential schemes 1-2 dwellings. Other buildings up to 999sqm. Meeting only	SR	Discretionary	£245.00	£250.00
Small Scale Minor Development – Residential schemes 1-2 dwellings. Other buildings up to 999sqm. Meeting and Written Advice	SR	Discretionary	£392.00	£400.00
Small Scale Minor Development – Subsequent Advice on Amended Schemes. Written Advice	SR	Discretionary	£73.50	£75.00
Small Scale Minor Development – Subsequent Advice on Amended Schemes. Meeting only	SR	Discretionary	£122.50	£125.00
Small Scale Minor Development – Subsequent Advice on Amended Schemes. Meeting and Written Advice	SR	Discretionary	£196.00	£200.00
Small Scale Minor Development – Building Control Advice. Written Advice	SR	Discretionary	£56.00	£57.00
Small Scale Minor Development – Building Control Advice. Meeting and Written Advice	SR	Discretionary	£117.00	£120.00
Small Scale Minor Development – Heritage Advice. Written Advice	SR	Discretionary	£31.00	£32.00
Small Scale Minor Development – Heritage Advice. Meeting only	SR	Discretionary	£31.00	£32.00
Small Scale Minor Development – Heritage Advice. Meeting and Written Advice	SR	Discretionary	£61.00	£62.00
Minor Residential Schemes 3-9 dwellings – Written Advice only	SR	Discretionary	£245.00	£250.00
Minor Residential Schemes 3-9 dwellings – Meeting only	SR	Discretionary	£343.00	£350.00
Minor Residential Schemes 3-9 dwellings – Meeting and Written Advice	SR	Discretionary	£588.00	£600.00
Minor Residential Schemes 3-9 dwellings – Subsequent Advice on Amended Schemes - Written Advice only	SR	Discretionary	£122.50	£125.00
Minor Residential Schemes 3-9 dwellings – Subsequent Advice on Amended Schemes - Meeting only	SR	Discretionary	£171.50	£175.00
Minor Residential Schemes 3-9 dwellings – Subsequent Advice on Amended Schemes - Meeting and Written Advice	SR	Discretionary	£294.00	£300.00
Minor Residential Schemes 3-9 dwellings – Building Control Advice - Written Advice only	SR	Discretionary	£102.00	£104.00



Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
Minor Residential Schemes 3-9 dwellings – Building Control Advice - Meeting and Written Advice	SR	Discretionary	£173.50	£177.00
Minor Residential Schemes 3-9 dwellings – Heritage Advice - Written Advice only	SR	Discretionary	£61.00	£62.00
Minor Residential Schemes 3-9 dwellings – Heritage Advice - Meeting only	SR	Discretionary	£61.00	£62.00
Minor Residential Schemes 3-9 dwellings – Heritage Advice - Meeting and Written Advice	SR	Discretionary	£122.50	£125.00
Small Scale Major Development – 10 up to 40 dwellings. Site area up to 0.5ha. 1000sqm - 4999sqm floor-space. Unaccompanied site visit – Written advice only	SR	Discretionary	£392.00	£400.00
Small Scale Major Development – 10 up to 40 dwellings. Site area up to 0.5ha. 1000sqm - 4999sqm floor-space. Unaccompanied site visit – Meeting only	SR	Discretionary	£441.00	£450.00
Small Scale Major Development – 10 up to 40 dwellings. Site area up to 0.5ha. 1000sqm - 4999sqm plus floor-space. Unaccompanied site visit – Meeting and Written Advice	SR	Discretionary	£832.50	£850.00
Small Scale Major Development – 10 up to 40 dwellings. Site area up to 0.5ha. 1000sqm - 4999sqm floor-space. Unaccompanied site visit – Advice on Amended Schemes - Written advice only	SR	Discretionary	£196.00	£200.00
Small Scale Major Development – 10 up to 40 dwellings. Site area up to 0.5ha. 1000sqm - 4999sqm plus floor-space. Unaccompanied site visit – Advice on Amended Schemes - Meeting only	SR	Discretionary	£220.50	£225.00
Small Scale Major Development – 10 up to 40 dwellings. Site area up to 0.5ha. 1000sqm - 4999sqm floor-space. Unaccompanied site visit – Advice on Amended Schemes - Meeting and Written advice	SR	Discretionary	£416.00	£424.00
Small Scale Major Development – 10 up to 40 dwellings. Site area up to 0.5ha. 1000sqm - 4999sqm floor-space. Building Control Advice - Written advice only	SR	Discretionary	£173.50	£177.00
Small Scale Major Development – 10 up to 40 dwellings. Site area up to 0.5ha. 1000sqm - 4999sqm floor-space. Building Control Advice - Meeting and Written advice	SR	Discretionary	£286.00	£292.00
Small Scale Major Development – 10 up to 40 dwellings. Site area up to 0.5ha. 1000sqm - 4999sqm floor-space. Heritage Advice - Written advice only	SR	Discretionary	£76.50	£78.00
Small Scale Major Development – 10 up to 40 dwellings. Site area up to 0.5ha. 1000sqm - 4999sqm floor-space. Unaccompanied site visit – Heritage Advice -Meeting only	SR	Discretionary	£76.50	£78.00
Small Scale Major Development – 10 up to 40 dwellings. Site area up to 0.5ha. 1000sqm - 4999sqm floor-space. Heritage Advice - Meeting and Written advice	SR	Discretionary	£153.00	£156.00
Large Scale Major Development – 41-99 Dwellings - Site are over 0.5ha. 5000sqm plus floor spaces - Meeting Only.	SR	Discretionary	£539.00	£550.00
Large Scale Major Development – 41-99 Dwellings - Site are over 0.5ha. 5000sqm plus floor spaces - Meeting and Written Advice	SR	Discretionary	£1,126.00	£1,150.00
Large Scale Major Residential Development – 41-99 Dwellings Site are over 0.5ha. 5000sqm plus floor spaces - Advice on Amended Schemes - Meeting Only	SR	Discretionary	£269.00	£274.00
Large Scale Major Residential Development – 41-99 Dwellings Site are over 0.5ha. 5000sqm plus floor spaces - Advice on Amended Schemes - Meeting and Written Advice	SR	Discretionary	£563.00	£575.00
Large Scale Major Residential Development – 41-99 Dwellings - Building Control Advice - Written Advice	SR	Discretionary	£286.00	£292.00

Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
Large Scale Major Residential Development – 41-99 Dwellings - Building Control Advice - Meeting and Written Advice	SR	Discretionary	£403.00	£411.00
Large Scale Major Residential Development – 41-99 Dwellings - Heritage Advice - Meeting Only	SR	Discretionary	£153.00	£156.00
Large Scale Major Residential Development – 41-99 Dwellings - Heritage Advice - Meeting and Written Advice	SR	Discretionary	£153.00	£156.00
Strategic Development – 100 plus dwellings or mixed use development that includes 1000sqm of non-residential floor space. Accompanied site visit.	SR	Discretionary	£1,763.00	£1,798.00
Strategic Development – 100 plus dwellings or mixed use development that includes 1000sqm of non-residential floor space. Advice on Amended Schemes	SR	Discretionary	£881.00	£899.00
Strategic Development – 100 plus dwellings or mixed use development that includes 1000sqm of non-residential floor space. Building Control Advice - Meeting and Written Advice	SR	Discretionary	£351.00	£358.00
Strategic Development – 100 plus dwellings or mixed use development that includes 1000sqm of non-residential floor space. Heritage Advice - Meeting and Written Advice	SR	Discretionary	£153.00	£156.00
High Hedge Complaint	SR	Discretionary	£459.00	£468.00
Admin Charge if we return application because information requested for validation is not provided within timescale - Householder	SR	Discretionary	£25.50	£26.00
Admin Charge if we return application because information requested for validation is not provided within timescale - Minor & Other Applications	SR	Discretionary	£51.00	£52.00
Admin Charge if we return application because information requested for validation is not provided within timescale - Major Applications	SR	Discretionary	£153.00	£156.00
Listed Building Advice for alteration or extension to a listed building or development within the curtilage if a listed building - On site Meeting (1 hour) plus written advice	SR	Discretionary	£153.00	£156.00
Listed Building Advice for alteration or extension to a listed building or development within the curtilage if a listed building - Site visit (No written advice)	SR	Discretionary	£98.00	£100.00
Registration and annual fee to be included on the register under the Self Build and Custom Housing Building Act 2015	OS	Discretionary	£20.50	£21.00
<b>PLANNING APPLICATIONS</b>				
<b>See separate document for scale of fee for planning applications, determinations, certificates of lawful use or development and advertising consents</b>				
<a href="#">Planning Portal Fees Legislation Link</a>				

Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
<b><u>BUILDING REGULATION CHARGES</u></b>				
TABLE 1 – Standard charges for new dwellings and flats up to 300m2 and not more than 3 storeys.				
TABLE 2 – Standard domestic charges including extensions and conversions to an existing dwelling				
TABLE 3 – Standard Charges for other work under £100,000 including				
For works over £100,000, please contact Building Control for an individual quote.				
If your building work is defined as requiring an individual determined charge, please contact us on 01353 665555, email us at bcservices@eastcambs.gov.uk				
<b>TABLE 1 – NEW DWELLINGS/FLATS &amp; DWELLINGS/FLATS FORMED BY CHANGE OF USE</b>				
(ALL FEE'S INCLUSIVE OF VAT UNLESS OTHERWISE STATED)				
<b>Full Plans Application/Plan Check Fee</b>				
1 Dwelling	SR		£226.00	
2 Dwellings	SR		£314.00	
2+ Dwellings	SR		POA	
<b>Full Plans Application Inspection Fee</b>				
1 Dwelling	SR		£548.00	
2 Dwellings	SR		£873.00	
2+ Dwellings	SR		POA	
<b>Building Notice Application (NO VAT)</b>				
1 Dwelling	OS		£727.00	
2 Dwellings	OS		£1,262.00	
2+ Dwellings	OS		POA	
<b>Regularisation Application (No VAT)</b>				
1 Dwelling	OS		£893.00	
2 Dwellings	OS		£1,262.00	
2+ Dwellings	OS		POA	
<b>Electrical Check &amp; Testing</b>				
1 Dwelling	SR		£893.00	
2 Dwellings	SR		£1,262.00	
2+ Dwellings	SR		POA	
<b>TABLE 2 – DOMESTIC EXTENSIONS AND CONVERSIONS</b>				
(ALL FEE'S INCLUSIVE OF VAT UNLESS OTHERWISE STATED)				
<b>Extension or annex with floor area not exceeding 10m1</b>				
Full Plans Application Plan Check Fee	SR		£189.00	
Full Plans Application Inspection Fee's	SR		£340.00	
Building Notice Application	SR		£609.00	
Regularisation Application No VAT	OS		£623.00	
<b>Extension or annex with floor area not exceeding 10m2 Extension or annex with floor area exceeding 10m2 but not exceeding 40m2</b>				
Full Plans Application Plan Check Fee	SR		£189.00	
Full Plans Application Inspection Fee's	SR		£454.00	
Building Notice Application	SR		£732.00	
Regularisation Application No VAT	OS		£750.00	

Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
<b>Extension or annex with floor area exceeding 40m2 but not exceeding 100m2</b>				
Full Plans Application Plan Check Fee	SR		£189.00	
Full Plans Application Inspection Fee's	SR		£596.00	
Building Notice Application	SR		£888.00	
Regularisation Application No VAT	OS		£909.00	
<b>A building or extension comprising solely of a garage, carport or store the total floor area not exceeding 60m2</b>				
Full Plans Application Plan Check Fee	SR		£189.00	
Full Plans Application Inspection Fee's	SR		£284.00	
Building Notice Application	SR		£546.00	
Regularisation Application No VAT	OS		£543.00	
<b>First or second floor loft conversions with a floor area not exceeding 100m2</b>				
Full Plans Application Plan Check Fee	SR		£189.00	
Full Plans Application Inspection Fee's	SR		£355.00	
Building Notice Application	SR		£694.00	
Regularisation Application No VAT	OS		£709.00	
<b>Garage conversion up to 60m2</b>				
Full Plans Application Plan Check Fee	SR		£125.00	
Full Plans Application Inspection Fee's	SR		£291.00	
Building Notice Application	SR		£396.00	
Regularisation Application No VAT	OS		£408.00	
Electrical Check & Testing			£228.00	

The charges in Table 2 apply to extensions, garages and conversions only. Where it is intended to carry out other alterations at the same time as the extension, the charges outlined in Table 3 will also apply.

### TABLE 3 – DOMESTIC ALTERATIONS

(ALL FEE'S INCLUSIVE OF VAT UNLESS OTHERWISE STATED)

#### Renovation of a thermal element

Full Plans Application Plan Check fee	SR		£143.00	
Plan Check fee Full Plans Application	SR		£0.00	
Building Notice Application	SR		£142.00	
Regularisation Application No VAT	OS		£160.00	

#### Replacement of windows, roof lights, roof windows or external glazed doors

Full Plans Application Plan Check fee	SR		£113.00	
Plan Check fee Full Plans Application	SR		£0.00	
Building Notice Application	SR		£113.00	
Regularisation Application No VAT	OS		£127.00	

#### Replacement Boiler/New wood burner

Full Plans Application Plan Check fee	SR		£143.00	
Plan Check fee Full Plans Application	SR		£0.00	
Building Notice Application	SR		£143.00	
Regularisation Application No VAT	OS		£160.00	

#### Renewable Energy systems/installation of wood burner

Full Plans Application Plan Check fee	SR		£143.00	
Plan Check fee Full Plans Application	SR		£0.00	
Building Notice Application	SR		£143.00	
Regularisation Application No VAT	OS		£160.00	

#### Alterations with a cost up to £5,000

Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
Full Plans Application Plan Check fee	SR		£254.00	
Plan Check fee Full Plans Application	SR		£0.00	
Building Notice Application	SR		£255.00	
Regularisation Application No VAT	OS		£287.00	
<b>Alterations exceeding £5,000 but not exceeding £10,000</b>				
Full Plans Application Plan Check fee			£188.00	
Plan Check fee Full Plans Application			£198.00	
Building Notice Application			£411.00	
Regularisation Application No VAT			£472.00	
<b>Alterations exceeding £10,000 but not exceeding £20,000</b>				
Full Plans Application Plan Check fee	SR		£188.00	
Plan Check fee Full Plans Application	SR		£325.00	
Building Notice Application	SR		£538.00	
Regularisation Application No VAT	OS		£606.00	
<b>Alterations exceeding £20,000 but not exceeding £50,000</b>				
Full Plans Application Plan Check fee	SR		£188.00	
Plan Check fee Full Plans Application	SR		£411.00	
Building Notice Application	SR		£686.00	
Regularisation Application No VAT	OS		£701.00	
<b>Alterations exceeding £50,000 but not exceeding £100,000</b>				
Full Plans Application Plan Check fee	SR		£188.00	
Plan Check fee Full Plans Application	SR		£532.00	
Building Notice Application	SR		£819.00	
Regularisation Application No VAT	OS		£837.00	
<b>Electrical work up to a value of £10,000</b>				
Full Plans Application Plan Check fee	SR		£238.00	
Plan Check fee Full Plans Application	SR		£0.00	
Building Notice Application	SR		£238.00	
Regularisation Application No VAT	OS		£303.00	
<b>Drainage works with a cost up to £5,000</b>				
Full Plans Application Plan Check fee	SR		£143.00	
Plan Check fee Full Plans Application	SR		£0.00	
Building Notice Application	SR		£142.00	
Regularisation Application No VAT	OS		£160.00	
<b>Electrical Check &amp; Testing</b>				
			£228.00	

The new Service Lead in Building Control is currently undertaking a full review of charges and will report back his findings in due course, it remains the intention to implement any approved changes by the 1st April 2021

<b>STREET NAMING &amp; NUMBERING</b>				
Property name additions/amendments/removals	OS	Discretionary	£51.00	£52.00
Naming of new streets	OS	Discretionary	£153.00	£156.00
Numbering of new properties				
1 property	OS	Discretionary	£51.00	£52.00
2 – 5 properties	OS	Discretionary	£76.50	£78.00
6 – 10 properties	OS	Discretionary	£102.00	£104.00
11 – 25 properties	OS	Discretionary	£153.00	£156.00
26 – 50 properties	OS	Discretionary	£255.00	£260.00

Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
51 – 100 properties	OS	Discretionary	£408.00	£416.00
101 + properties	OS	Discretionary	£510.00	£520.00
			Plus £10.50 per property over 101	Plus £10.50 per property over 101
Division of properties – same as numbering of new properties (and based on number of properties created including the original)	OS	Discretionary	See numbering of new properties	See numbering of new properties
Confirmation of address to solicitors / conveyancers / occupiers or owners	OS	Discretionary	£25.50	£26.00
Renumbering of scheme following development replan (after notification of numbering scheme issued)	OS	Discretionary	£102.00 + £10 per property	£102.00 + £10 per property
Address issued/confirmed when replacement property built (as the original address will have been removed following the demolition as address may be different to original property) reactivation of address	OS	Discretionary	£51.00 per property	£52 per property
1 <sup>st</sup> set of nameplates erected for each new street if one nameplate required	OS	Discretionary	£229.50	£234.00
1 <sup>st</sup> set of nameplates erected for each new street if two nameplates required	OS	Discretionary	£331.50	£338.00
For each additional nameplate that is required to be erected at other junctions and entrances onto the new street	OS	Discretionary	£102.00	£104.00
Challenges/requests/revisions to existing street naming and numbering schemes	OS	Discretionary	Price on Application	
<b>E-SPACE BUSINESS CENTRES</b>				
Ely – Annual rental charge per square foot (effective for new leases and on renewals)	SR	Discretionary	£30.00	£31.00
Littleport – Annual rental charge per square foot (effective on new leases and on renewals)	SR	Discretionary	£20.00	£20.50
<b>PHOTOCOPYING CHARGES</b>				
Up to 10 A4 pages	SR	Discretionary	No charge	No charge
11 A4 pages and over	SR	Discretionary	£1.10 plus 10p per copy	£1.20 plus 10p per copy
A3 copies (2xA4)	SR	Discretionary	As above plus 20p per copy	As above plus 20p per copy
A2 copies (4xA4)	SR	Discretionary	As above plus 40p per copy	As above plus 40p per copy
A1 copies (8xA4)	SR	Discretionary	As above plus 80p per copy	As above plus 80p per copy
Copy of Building Control Completion Certificate			£10.20	£10.40
<b>ENVIRONMENTAL SERVICES</b>				
Safer Food Better Business Mentoring Scheme	SR	Discretionary	£51.00 per hour	£50 per hour
Re-rating inspection fee for food business	OS	Discretionary	£133.00	£135.00

Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
<b>HYPNOTISM</b>				
Daily permit to stage a show	OS	Discretionary	£93.00	£93.00
<b>GAMBLING ACT 2005</b>				
<b>Casino Premises Licence - Regional</b>				
Maximum non conversion application fee in respect of provisional statement premises	OS	Statutory	£8,000.00	£8,000.00
Maximum non conversion application fee in respect of other premises	OS	Statutory	£15,000.00	£15,000.00
Annual fee	OS	Statutory	£15,000.00	£15,000.00
Fee for application to vary licence	OS	Statutory	£7,500.00	£7,500.00
Fee for application to transfer licence	OS	Statutory	£6,500.00	£6,500.00
Fee for application for reinstatement of a licence	OS	Statutory	£6,500.00	£6,500.00
Fee for application for provisional statement	OS	Statutory	£15,000.00	£15,000.00
<b>Casino Premises Licence - Large</b>				
Maximum non conversion application fee in respect of provisional statement premises	OS	Statutory	£5,000.00	£5,000.00
Maximum non conversion application fee in respect of other premises	OS	Statutory	£10,000.00	£10,000.00
Annual fee	OS	Statutory	£10,000.00	£10,000.00
Fee for application to vary licence	OS	Statutory	£5,000.00	£5,000.00
Fee for application to transfer licence	OS	Statutory	£2,150.00	£2,150.00
Fee for application for reinstatement of a licence	OS	Statutory	£2,150.00	£2,150.00
Fee for application for provisional statement	OS	Statutory	£10,000.00	£10,000.00
<b>Casino Premises Licence - Small</b>				
Maximum non conversion application fee in respect of provisional statement premises	OS	Statutory	£3,000.00	£3,000.00
Maximum non conversion application fee in respect of other premises	OS	Statutory	£8,000.00	£8,000.00
Annual fee	OS	Statutory	£5,000.00	£5,000.00
Fee for application to vary licence	OS	Statutory	£4,000.00	£4,000.00
Fee for application to transfer licence	OS	Statutory	£1,800.00	£1,800.00
Fee for application for reinstatement of a licence	OS	Statutory	£1,800.00	£1,800.00
Fee for application for provisional statement	OS	Statutory	£8,000.00	£8,000.00
<b>Casino Premises Licence - Converted</b>				
Maximum conversion application fee for non fast track application	OS	Statutory	£2,000.00	£2,000.00
Annual fee	OS	Statutory	£3,000.00	£3,000.00
Fee for application to vary licence	OS	Statutory	£2,000.00	£2,000.00
Fee for application to transfer licence	OS	Statutory	£1,350.00	£1,350.00
Fee for application for reinstatement of a licence	OS	Statutory	£1,350.00	£1,350.00
<b>Bingo Premises Licence</b>				
Maximum conversion application fee for non fast track application	OS	Statutory	£1,750.00	£1,750.00
Maximum non conversion application fee in respect of provisional statement premises	OS	Statutory	£1,200.00	£1,200.00
Maximum non conversion application fee in respect of other premises	OS	Statutory	£3,500.00	£3,500.00
Annual fee	OS	Statutory	£1,000.00	£1,000.00
Fee for application to vary licence	OS	Statutory	£1,750.00	£1,750.00
Fee for application to transfer licence	OS	Statutory	£1,200.00	£1,200.00
Fee for application for reinstatement of a licence	OS	Statutory	£1,200.00	£1,200.00

Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
Fee for application for provisional statement	OS	Statutory	£3,500.00	£3,500.00
<b>Adult Gaming Premises Licence</b>				
Maximum conversion application fee for non fast track application	OS	Statutory	£1,000.00	£1,000.00
Maximum non conversion application fee in respect of provisional statement premises	OS	Statutory	£1,200.00	£1,200.00
Maximum non conversion application fee in respect of other premises	OS	Statutory	£2,000.00	£2,000.00
Annual fee	OS	Statutory	£1,000.00	£1,000.00
Fee for application to vary licence	OS	Statutory	£1,000.00	£1,000.00
Fee for application to transfer licence	OS	Statutory	£1,200.00	£1,200.00
Fee for application for reinstatement of a licence	OS	Statutory	£1,200.00	£1,200.00
Fee for application for provisional statement	OS	Statutory	£2,000.00	£2,000.00
<b>Betting Premises (Track) Licence</b>				
Maximum conversion application fee for non fast track application	OS	Statutory	£1,250.00	£1,250.00
Maximum non conversion application fee in respect of provisional statement premises	OS	Statutory	£950.00	£950.00
Maximum non conversion application fee in respect of other premises	OS	Statutory	£2,500.00	£2,500.00
Annual fee	OS	Statutory	£1,000.00	£1,000.00
Fee for application to vary licence	OS	Statutory	£1,250.00	£1,250.00
Fee for application to transfer licence	OS	Statutory	£950.00	£950.00
Fee for application for reinstatement of a licence	OS	Statutory	£950.00	£950.00
Fee for application for provisional statement	OS	Statutory	£2,500.00	£2,500.00
<b>Family Entertainment Centre Premises Licence</b>				
Maximum conversion application fee for non fast track application	OS	Statutory	£1,000.00	£1,000.00
Maximum non conversion application fee in respect of provisional statement premises	OS	Statutory	£950.00	£950.00
Maximum non conversion application fee in respect of other premises	OS	Statutory	£2,000.00	£2,000.00
Annual fee	OS	Statutory	£750.00	£750.00
Fee for application to vary licence	OS	Statutory	£1,000.00	£1,000.00
Fee for application to transfer licence	OS	Statutory	£950.00	£950.00
Fee for application for reinstatement of a licence	OS	Statutory	£950.00	£950.00
Fee for application for provisional statement	OS	Statutory	£2,000.00	£2,000.00
<b>Betting Premises (Other) Licence</b>				
Maximum conversion application fee for non fast track application	OS	Statutory	£1,500.00	£1,500.00
Maximum non conversion application fee in respect of provisional statement premises	OS	Statutory	£1,200.00	£1,200.00
Maximum non conversion application fee in respect of other premises	OS	Statutory	£3,000.00	£3,000.00
Annual fee	OS	Statutory	£600.00	£600.00
Fee for application to vary licence	OS	Statutory	£1,500.00	£1,500.00
Fee for application to transfer licence	OS	Statutory	£1,200.00	£1,200.00
Fee for application for reinstatement of a licence	OS	Statutory	£1,200.00	£1,200.00
Fee for application for provisional statement	OS	Statutory	£3,000.00	£3,000.00
<b>Temporary Use Notices</b>				
Temporary Use Notice fee	OS	Statutory	£500.00	£500.00



Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
Replacement of an endorsed copy	OS	Statutory	£25.00	£25.00
<b>All premises licences</b>				
Change of circumstances fee	OS	Statutory	£50.00	£50.00
Fee for a copy licence	OS	Statutory	£25.00	£25.00
<b>GAMBLING ACT 2005 PERMITS</b>				
<b>Family Entertainment Centre Gaming Machine Permit</b>				
Application fee	OS	Statutory	£300.00	£300.00
Renewal	OS	Statutory	£300.00	£300.00
Change of name	OS	Statutory	£25.00	£25.00
Copy of permit	OS	Statutory	£15.00	£15.00
<b>Club Gaming Permits</b>				
Application fee - holder of club premises certificate or holder of existing Pt 2 or 3 registration under Gaming Act 1968	OS	Statutory	£100.00	£100.00
Application fee – non club premises certificate holder	OS	Statutory	£200.00	£200.00
Renewal after 10 years	OS	Statutory	£200.00	£200.00
Copy of permit	OS	Statutory	£15.00	£15.00
Variation	OS	Statutory	£100.00	£100.00
<b>Club Machine Permits</b>				
Application fee - holder of club premises certificate or holder of existing Pt 2 or 3 registration under Gaming Act 1968	OS	Statutory	£100.00	£100.00
Application fee – non club premises certificate holder	OS	Statutory	£200.00	£200.00
Renewal after 10 years	OS	Statutory	£200.00	£200.00
Copy of permit	OS	Statutory	£15.00	£15.00
Variation	OS	Statutory	£100.00	£100.00
<b>Alcohol Licensed Premises – 2 or less machines</b>				
Notification fee	OS	Statutory	£50.00	£50.00
<b>Alcohol Licensed Premises – more than 2 machines</b>				
Application fee	OS	Statutory	£150.00	£150.00
Annual fee	OS	Statutory	£50.00	£50.00
Change of name	OS	Statutory	£25.00	£25.00
Copy of permit	OS	Statutory	£15.00	£15.00
Variation	OS	Statutory	£100.00	£100.00
Transfer	OS	Statutory	£25.00	£25.00
<b>Prize Gaming Permits (pubs)</b>				
Application fee	OS	Statutory	£300.00	£300.00
Renewal	OS	Statutory	£300.00	£300.00
Change of name	OS	Statutory	£25.00	£25.00
Copy of permit	OS	Statutory	£15.00	£15.00
<b>Registration Of Small Society Lotteries</b>				
Lottery registration	OS	Statutory	£40.00	£40.00
Lottery renewals	OS	Statutory	£20.00	£20.00

Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
<b>HACKNEY CARRIAGE AND PRIVATE HIRE FEES</b>				
<b>New Driver Licence Application for 12 months</b>				
Joint Hackney Carriage <u>and</u> Private Hire (incl. 1st knowledge test)	OS	Discretionary	£217.00	£217.00
Knowledge Test Re-sit	OS	Discretionary	£20.00	£20.00
<b>Renewal of Driver Licence Application for 12 months</b>				
Joint Hackney Carriage <u>and</u> Private Hire	OS	Discretionary	£175.00	£175.00
<b>New Driver Licence Application for 36 months</b>				
Joint Hackney Carriage <u>and</u> Private Hire (incl. 1st knowledge test)	OS	Discretionary	£567.00	£567.00
<b>Renewal of Driver Licence Application for 36 months</b>				
Joint Hackney Carriage <u>and</u> Private Hire	OS	Discretionary	£570.00	£570.00
<b>General driver fees</b>				
Three yearly Criminal Records Bureau disclosure		Discretionary	£49.00	£49.00
DVLA check		Discretionary	£5.00	£5.00
<b>New Vehicle (Plate) Licence Application</b>				
Private Hire Vehicle Licence – 1 year	OS	Discretionary	£250.00	£250.00
Hackney Carriage Vehicle Licence – 1 year	OS	Discretionary	£250.00	£250.00
<b>Renewal Vehicle (Plate) Licence Application</b>				
Private Hire Vehicle Licence – 1 year	OS	Discretionary	£250.00	£250.00
Hackney Carriage Vehicle Licence – 1 year	OS	Discretionary	£250.00	£250.00
<b>Transfer of Vehicle Plate/licence</b>				
Private Hire	OS	Discretionary	£35.00	£35.00
Hackney Carriage	OS	Discretionary	£25.00	£25.00
<b>Variation of Vehicle Plate/licence</b>				
Private Hire	OS	Discretionary	£35.00	£35.00
Hackney Carriage	OS	Discretionary	£25.00	£25.00
<b>Private Hire Operator's Licence</b>				
New & Renewal - 1 year - Single vehicle	OS	Discretionary	£126.00	£126.00
New & Renewal - 1 year - 2 to 5 vehicles	OS	Discretionary	£156.00	£156.00
New & Renewal - 1 year - 6 to 10 vehicles	OS	Discretionary	£186.00	£186.00
New & Renewal - 1 year - 11 + vehicles	OS	Discretionary	£216.00	£216.00
New & Renewal - 5 year - Single vehicle	OS	Discretionary	£627.00	£627.00
New & Renewal - 5 year - 2 to 5 vehicles	OS	Discretionary	£737.00	£737.00
New & Renewal - 5 year - 6 to 10 vehicles	OS	Discretionary	£847.00	£847.00
New & Renewal - 5 year - 11 + vehicles	OS	Discretionary	£957.00	£957.00
<b>Replacement Items (charge applicable per licence)</b>				
Joint P/H & H/C Licence	OS	Discretionary	£10.50	£10.50
P/H or H/C Vehicle Licence	OS	Discretionary	£10.50	£10.50
Private Hire Operator Licence	OS	Discretionary	£10.50	£10.50
Joint P/H and H/C Driver Badge/ID	OS	Discretionary	£10.50	£10.50
P/H or H/C Vehicle Plate	OS	Discretionary	£20.00	£20.00
Joint P/H and H/C Driver change of address	OS	Discretionary	£10.50	£10.50
P/H and H/C Vehicle change of address	OS	Discretionary	£10.50	£10.50
Theft, loss etc of a licence	OS	Discretionary	£10.50	£10.50
Replacement door sticker	OS	Discretionary	£6.00	£6.00
DBS update service check	OS	Discretionary	£5.00	£5.00
Knowledge test re-sit fee	OS	Discretionary	£20.00	£20.00

Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
DBS enhanced check (where no DBS update service option available)	OS	Discretionary	£49.00	£49.00
DVLA licence check	OS	Discretionary	£5.00	£5.00
<b>PARK HOMES / CARAVAN SITES / MOBILE HOMES</b>				
<b>Costs of New Applications</b>				
1-5 pitches	OS	Discretionary	£212.00	£216.00
6-10 pitches	OS	Discretionary	£232.00	£237.00
11-20 pitches	OS	Discretionary	£232.00	£237.00
21-50 pitches	OS	Discretionary	£251.00	£256.00
51-100 pitches	OS	Discretionary	£270.50	£276.00
Greater than 100 pitches	OS	Discretionary	£270.50	£276.00
<b>Annual Inspection Fees</b>				
1-5 pitches	OS	Discretionary	nil	nil
6-10 pitches	OS	Discretionary	£229.50	£234.00
11-20 pitches	OS	Discretionary	£229.50	£234.00
21-50 pitches	OS	Discretionary	£229.50	£234.00
51-100 pitches	OS	Discretionary	£268.50	£274.00
Greater than 100 pitches	OS	Discretionary	£268.50	£274.00
Cost of Laying Site Rules	OS	Discretionary	£28.00	£28.56
Cost of Variation / Transfer	OS	Discretionary	£102.00	£104.04
<b>ZOO LICENCE</b>				
New establishment (excl. VET fees)	OS	Discretionary	£2,415.00	£2,415.00
Renewal (excl. VET fees)	OS	Discretionary	£2,070.00	£2,070.00
Theft, loss etc of a licence	OS	Discretionary	£10.50	£10.50
Change of name on licence	OS	Discretionary	£10.50	£10.50
Change of licence details	OS	Discretionary	£10.50	£10.50
<b>ANIMAL WELFARE LICENCE</b>				
Animal Welfare Licence - New and renewal applications	OS	Discretionary	£290.00 - £2,490	£290.00 - £2,490
Re-rating inspection fee	OS	Discretionary	£72.00 - £168.00	£72.00 - £168.00
Variation requiring inspection	OS	Discretionary	£72.00 - £168.00	£72.00 - £168.00
Copy licence, change of details not requiring inspection	OS	Discretionary	£10.50	£10.50
<b>DANGEROUS WILD ANIMALS (2 YR LICENCE)</b>				
New establishment (excl. VET fees)	OS	Discretionary	£648.00	£648.00
Renewal applications (excl. VET fees)	OS	Discretionary	£648.00	£648.00
Theft, loss etc of a licence	OS	Discretionary	£10.50	£10.50
Change of name on licence	OS	Discretionary	£10.50	£10.50
Change of licence details	OS	Discretionary	£10.50	£10.50
<b>STRAY DOGS</b>				
Stray Dog Collection - per dog	OS	Statutory	£25.00	£25.00
Kennelling Charge per night/or few hours	OS	Discretionary	£16.20	£16.50
Stray dog collection (anytime)	OS	Discretionary	£50.00	£51.00
Transfer to Woodgreen	OS	Discretionary	£40.00	£41.00
Admin Fee	OS	Discretionary	£10.00	£10.20
<b>PRIVATE WATER SUPPLY SAMPLING</b>				

Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
Risk Assessment (each assessment) - officer hourly rate x time taken up to a maximum fee	OS	Discretionary	Max £500.00	Max £500.00
Sampling (each visit) - officer hourly rate x time taken up to a maximum fee	OS	Discretionary	Max £100.00	Max £100.00
Investigation (each investigation) - officer hourly rate x time taken up to a maximum fee	OS	Discretionary	Max £100.00	Max £100.00
Granting an authorisation (each authorisation) - officer hourly rate x time taken up to a maximum fee	OS	Discretionary	Max £100.00	Max £100.00
<b>Analysing a sample</b>				
Taken under Regulation 10 - officer hourly rate x time taken up to a maximum fee	OS	Discretionary	Max £25.00	Max £25.00
Taken during check monitoring - officer hourly rate x time taken up to a maximum fee	OS	Discretionary	Max £100.00	Max £100.00
Taken during audit monitoring - officer hourly rate x time taken up to a maximum fee	OS	Discretionary	Max £500.00	Max £500.00
<b>IMMIGRATION HOUSING INSPECTIONS</b>				
Production of housing condition reports	OS	Discretionary	£105.00	£110.00
<b>LICENSING OF HOUSES IN MULTIPLE OCCUPATION</b>				
Mandatory licence for 5 years	OS	Discretionary	£310.00	£320.00
<b>SKIN PIERCING (ACUPUNCTURE, TATTOOING, PERMANENT AND SEMI PERMANENT SKIN COLOURING)</b>				
Premises	OS	Discretionary	£186.00	£190.00
Per Individual	OS	Discretionary	£186.00	£190.00
Amendment of Export health or skin piercing certificate	OS	Discretionary	£10.50	£10.50
<b>SEX ESTABLISHMENTS</b>				
Application	OS	Discretionary	£3,761.00	£3,761.00
Renewal	OS	Discretionary	£1,880.50	£1,880.50
Variation	OS	Discretionary	£1,880.50	£1,880.50
Transfer	OS	Discretionary	£1,880.50	£1,880.50
Theft, loss etc of a licence	OS	Discretionary	£10.50	£10.50
<b>TRAVELLER SITE RENTS</b>				
Burwell – Site Rent per week	EX	Discretionary	N/A	
Burwell – Water & Waste Charge per week	EX	Discretionary	N/A	
Earith Bridge – Site Rent per week	EX	Discretionary	£85.00	£85.00
Earith Bridge – Water & Waste Charge per week	EX	Discretionary	£10.00	£10.00
Wentworth – Site Rent per week	EX	Discretionary	£85.00	£85.00
Wentworth – Water & Waste Charge per week	EX	Discretionary	£10.00	£10.00
<b>STREET TRADING</b>				
Street Trading - Consent - Annual	OS	Discretionary	£520.00 - £1,040.00	£520.00 - £1,040.00
Street Trading– Consent - Daily Permit	OS	Discretionary	£15.00 - £30.00	£15.00 - £30.00
Street Trading - Consent - Transfer	OS	Discretionary	£48.00	£48.00
Street Trading Consent - Event	OS	Discretionary	£20.00 - £500.00	£20.00 - £500.00

Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
<b>THE POLLUTION PREVENTION &amp; CONTROL ACT 1990</b>				
<b>ENVIRONMENTAL PERMITTING REGULATIONS 2010</b>				
See link for nationally set figures		Statutory		
<a href="#">Environment Permitting Regulations</a>				
<b>LICENSING ACT 2003</b>				
<b>Personal Licence</b>				
Application for a grant of a personal licence	OS	Statutory	£37.00	£37.00
Theft, loss etc of a personal licence	OS	Statutory	£10.50	£10.50
<b>Temporary Event Notices</b>				
Temporary & Late Temporary Event Notices	OS	Statutory	£21.00	£21.00
Theft, loss etc of Temporary Event Notice	OS	Statutory	£10.50	£10.50
<b>Premises Licence</b>				
Application for transfer of a premises licence	OS	Statutory	£23.00	£23.00
Theft, loss etc of premises licence	OS	Statutory	£10.50	£10.50
Loss of premises summary	OS	Statutory	£10.50	£10.50
Application to vary licence to specify individual as designated premises supervisor (DPS)	OS	Statutory	£23.00	£23.00
Application to dis-apply designated premises supervisor (DPS) on community premises	OS	Statutory	£23.00	£23.00
<b>Club Premises</b>				
Change of relevant registered address of club	OS	Statutory	£10.50	£10.50
Notification of change of name or alteration of club rules	OS	Statutory	£10.50	£10.50
Theft, loss etc of club certificate	OS	Statutory	£10.50	£10.50
<b>General</b>				
Minor variation to a premises licence or club premises certificate	OS	Statutory	£89.00	£89.00
Notification of change of name or address	OS	Statutory	£10.50	£10.50
Duty to notify change of name or address	OS	Statutory	£10.50	£10.50
Application fee for a provisional statement where premises being built	OS	Statutory	£315.00	£315.00
Interim authority notice following death etc of licence holder	OS	Statutory	£23.00	£23.00
Right of freeholder etc to be notified of licensing matters	OS	Statutory	£21.00	£21.00
<b>New Premises Licence Applications And Variations For Premises And Club Premises Licences</b>				
Band A	OS	Statutory	£100.00	£100.00
Band B	OS	Statutory	£190.00	£190.00
Band C	OS	Statutory	£315.00	£315.00
Band D	OS	Statutory	£450.00	£450.00
Band D when primary business Alcohol Sales x 2	OS	Statutory	£900.00	£900.00
Band E	OS	Statutory	£635.00	£635.00
Band E when primary business Alcohol Sales x 3	OS	Statutory	£1,905.00	£1,905.00
<b>Premises Annual Renewal</b>				
Band A	OS	Statutory	£70.00	£70.00
Band B	OS	Statutory	£180.00	£180.00
Band C	OS	Statutory	£295.00	£295.00

Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
Band D	OS	Statutory	£320.00	£320.00
Band D when primary business Alcohol Sales x 2	OS	Statutory	£640.00	£640.00
Band E	OS	Statutory	£350.00	£350.00
Band E when primary business Alcohol Sales x 3	OS	Statutory	£1,050.00	£1,050.00
<b>Additional Fees For Large Venues And Events</b>				
Number in attendance at any one time				
5,000 – 9,999	OS	Statutory	£1,000.00	£1,000.00
10,000 – 14,999	OS	Statutory	£2,000.00	£2,000.00
15,000 – 19,999	OS	Statutory	£4,000.00	£4,000.00
20,000 – 29,999	OS	Statutory	£8,000.00	£8,000.00
30,000 – 39,999	OS	Statutory	£16,000.00	£16,000.00
40,000 – 49,999	OS	Statutory	£24,000.00	£24,000.00
50,000 – 59,999	OS	Statutory	£32,000.00	£32,000.00
60,000 – 69,999	OS	Statutory	£40,000.00	£40,000.00
70,000 – 79,999	OS	Statutory	£48,000.00	£48,000.00
80,000 – 89,999	OS	Statutory	£56,000.00	£56,000.00
90,000 and over	OS	Statutory	£64,000.00	£64,000.00
<b>SCRAP METAL DEALER LICENCE</b>				
Initial Site Licence Fee	OS	Discretionary	£732.00	£732.00
Site Licence Renewal	OS	Discretionary	£600.00	£600.00
Initial Collectors Licence Fee	OS	Discretionary	£560.00	£560.00
Collectors Licence renewal.	OS	Discretionary	£450.00	£450.00
Variation for both licences.	OS	Discretionary	£120.00	£120.00
Theft, loss etc of a licence	OS	Discretionary	£10.50	£10.50
<b>WASTE</b>				
<b>Bulky Waste</b>				
Up to three household items	OS	Discretionary	£25.50	£26.00
Fridge or freezer	OS	Discretionary	£25.50	£26.00
Initial cost of bins for new residential properties (this is for each bin provided)	OS	Discretionary	£25.50	£26.00
Annual Garden Waste Wheeled Bin Licence - this is for an additional bin	OS	Discretionary	£49.00	£50.00
Delivery and Administration Charge for additional blue bin (one off charge)	SR	Discretionary	£25.50	£26.00
Fly Tipping Fee	OS	Statutory	£400.00	£400.00
<b>ENVIRONMENTAL PROTECTION ACT PERMIT</b>				
<b>EXPORT CERTIFICATE OF HEALTH</b>				
Amendment of Export Heath Certificate	OS	Discretionary	£97.00	£99.00
		Discretionary	£10.00	£10.00
<b><u>FACILITIES MANAGEMENT</u></b>				
<b>GARAGE RENTS – ST JOHNS ROAD, ELY</b>				
Monthly charge	SR	Discretionary	29.76 (Including VAT)	29.76 (Including VAT) plus RPI as at 1.1.21

Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
<b>LEGAL SERVICES</b>				
LLC1 ONLY	OS	Discretionary	£21.95	£22.40
CON29(R) ONLY	SR	Discretionary	£130.50	£133.10
STANDARD SEARCH - LLC1 AND CON29(R)	SR/OS	Discretionary	£152.50	£155.50
<b>CON29 OPTIONAL ENQUIRIES</b>				
Q4 Road proposal by private bodies	SR	Discretionary	£10.50	£10.70
Q5. Advertisements	SR	Discretionary	£10.50	£10.70
Q6 Completion Notices	SR	Discretionary	£13.70	£14.00
Q7 Parks and Countryside	SR	Discretionary	£10.50	£10.70
Q8 Pipelines	SR	Discretionary	£3.50	£3.60
Q9 Houses in Multiple Occupation	SR	Discretionary	£3.50	£3.60
Q10 Noise Abatement	SR	Discretionary	£3.00	£3.10
Q11 Urban Development Areas	SR	Discretionary	£10.50	£10.70
Q12 Enterprise Zones, Local Development Orders and BIDS	SR	Discretionary	£3.50	£3.60
Q13 Inner Urban Improvement Areas	SR	Discretionary	£3.50	£3.60
Q14 Simplified Planning Zones	SR	Discretionary	£10.50	£10.70
Q15 Land Maintenance Notices	SR	Discretionary	£10.50	£10.70
Q16 Mineral Consultation and Safeguarding Areas	SR	Discretionary	£5.00	£5.10
Q17 Hazardous Substance Consents	SR	Discretionary	£10.50	£10.70
Q18 Environmental and Pollution Notices	SR	Discretionary	£3.50	£3.60
Q19 Food Safety Notices	SR	Discretionary	£7.90	£8.10
Q20 Hedgerow Notices	SR	Discretionary	£3.50	£3.60
Q21 Flood Defence and Land Drainage Consents	SR	Discretionary	£5.20	£5.30
Q22 Common Land and Town or Village Green	SR	Discretionary	£10.20	£10.50
<b>CON29 ENQUIRIES</b>				
1.1a-i Planning and Building Decisions and Pending			Total £9.70	Total £9.90
1.1 j-l Planning and Building Decisions and Pending			Total £4.0	Total £4.10
1.2 Planning designations and proposals			Total £0.90	Total £0.95
2.1 to 2.5 Roadways and footpaths			HIGHWAYS	HIGHWAYS
3.1 Other Matters - Is the property included in land required for public purposes	SR	Discretionary	Total £3.80	Total £3.90
3.2 Other Matters - Is the property included in land required for road works	SR	Discretionary	HIGHWAYS	HIGHWAYS
3.3 Drainage Matters			Total £2.80	Total £2.90
3.4 Nearby Road Schemes			HIGHWAYS	HIGHWAYS
3.5 Nearby Railway Schemes			HIGHWAYS	HIGHWAYS
3.6 Traffic Schemes			HIGHWAYS	HIGHWAYS
3.7 Outstanding Notices (a) (b) (c) (d) & (f) only			Total £6.30	Total £6.40
3.8 Contravention of Building Regulations			Total £2.60	Total £2.70
3.9 Notices, Orders, Direction and Proceedings under			Total £4.70	Total £4.80
3.10 Community Infrastructure Levy (CIL)			Total £7.80	Total £7.90
3.11 Conservation Area			Total £4.0	Total £4.10
3.12 Compulsory Purchase			Total £4.0	Total £4.10
3.13 Contaminated Land			Total £0.90	Total £0.95
3.14 Radon Gas			Total £1.80	Total £1.90
3.15 Assets of Community Value			Total £5.20	Total £5.30

Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
<b>REGISTER OF ELECTORS</b>				
<b>Sale of Copies of Register of Electors</b>				
Data Form per 1000 electors or part of	OS	Statutory	£21.00, plus £1.50	£20.00 plus £1.50
Printed Form per 1000 electors or part of	OS	Statutory	£10.50, plus £5.00	£10.00 plus £5.00
<b>List of Overseas Electors</b>				
Data Form per 1000 electors or part of	OS	Statutory	£21.00 plus £1.50	£20.00 plus £1.50
Printed Form per 1000 electors or part of	OS	Statutory	£10.50 plus £5.00	£10.00 plus £5.00
<b>LEGAL WORK</b>				
<b>Section 106 Agreements &amp; Variations</b>				
<b>Hourly rates ***</b>				
Legal Services Manager/Planning Solicitor	OS	Discretionary	£155.00	£158.00
Legal Assistant	OS	Discretionary	£125.00	£128.00
Senior Legal Assistant	OS	Discretionary	£135.00	£138.00
Land Charges Officer & Paralegal/Paralegal	OS	Discretionary	£51.00	£52.00
Information Officer	OS	Discretionary	£56.00	£57.00
Simple S106 - Standard Charge	OS	Discretionary	£1,100.00	£1,122.00
<b>Easements (e.g. Car parking verges etc)</b>				
Simple	OS	Discretionary	£690.00	£710.00
Complex	OS	Discretionary	See hourly rates above***	See hourly rates above***
<b>Conveyancing (e.g. POS, small parcels of land, small leases &amp; Licences, etc)</b>				
Simple	OS	Discretionary	£690.00	£710.00
Complex	OS	Discretionary	See hourly rates above***	See hourly rates above***
<b>Release of restrictive covenant</b>				
Simple	OS	Discretionary	£690.00	£710.00
Complex	OS	Discretionary	See hourly rates above***	See hourly rates above***
<b>Miscellaneous Deeds</b>				
Simple	OS	Discretionary	£690.00	£710.00
Complex	OS	Discretionary	See hourly rates above***	See hourly rates above***
<b>Prosecutions</b>				
Car Parking	OS	Discretionary	£102 plus Legal Officer presentation time at court and disbursements – i.e. if have to travel to Court	£105 plus Legal Officer presentation time at court and disbursements – i.e. if have to travel to Court
Licence - Garage at St John's Road	OS	Discretionary	£113.00	£115.00
All prosecutions			See hourly rates above***	See hourly rates above***
Miscellaneous removal of charge from property	OS	Discretionary	£113.00	£115.00
<b>Mortgages</b>				
Redemptions	OS	Discretionary	£225.00	£230.00



Description	VAT code	Discretionary or Statutory	Charge for 2020/21	Proposed Charge for 2021/22
<b>Civil Cases</b>	OS	Discretionary	See hourly rates above***	See hourly rates above***

**Capital Programme 2020/21 to 2024/25**

<b>CAPITAL BUDGET</b>	<b>Projected Spend 2020/21 £</b>	<b>Proposed Budget 2021/22 £</b>	<b>Proposed Budget 2022/23 £</b>	<b>Proposed Budget 2023/24 £</b>	<b>Proposed Budget 2024/25 £</b>
<b>Operational Services</b>					
Refuse Vehicles	32,077	<b>2,000,000</b>			
Depot		<b>845,950</b>			
Waste Bins	40,000	<b>40,000</b>	40,000	40,000	40,000
Conservation Area Schemes - 2nd round	27,506				
Mandatory Disabled Facilities Grants (DFG)	873,610	<b>697,299</b>	697,299	697,299	697,299
Empty Properties, Discretionary DFGs, Minor Works, Home Repair Asst.	75,000	<b>75,000</b>	75,000	75,000	75,000
Vehicle Etc. Replacements	118,187	<b>29,000</b>	29,000	29,000	29,000
<b>Operational Services Total</b>	<b>1,166,380</b>	<b>3,687,249</b>	<b>841,299</b>	<b>841,299</b>	<b>841,299</b>
<b>Finance and Assets</b>					
Intranet / HR / Payroll System Improvements	15,980				
Riverside Moorings	289,500				
A14 Contribution		<b>40,000</b>	40,000	40,000	40,000
Extension to Ely Country Park	163,200				
East Cambs Trading Company - Loans	7,080,000	<b>100,000</b>			
<b>Finance and Assets Total</b>	<b>7,548,680</b>	<b>140,000</b>	<b>40,000</b>	<b>40,000</b>	<b>40,000</b>
<b>Capital Programme Total</b>	<b>8,715,060</b>	<b>3,827,249</b>	<b>881,299</b>	<b>881,299</b>	<b>881,299</b>

**Refuse Vehicles**

The Council purchases and then hires to East Cambs Street Scene refuse vehicles to be used to undertake the refuse contract for the Council. A large number of vehicles will need to be purchased in 2021/22 when the vehicles purchased with the Weekly Collection Grant reach the end of their economic life. It had previously been planned to purchase these vehicles in 2020/21, but Government are currently developing their Waste strategy, so purchases have been delayed to ensure that the vehicles purchased address the needs placed upon the Council by this revised strategy.

**Depot**

The depot, including the drainage on the site, will be improved to provide staff with a safe environment.

**Waste Bins**

As the number of residential houses increase within the District, the Council is required to purchase wheeled bins for these properties.

**Conservation Area Schemes**

This scheme is for the Steeple Row enhancement, led by Ely Perspective for public realm improvements in the Steeple Row area. The remaining balance is required to provide partnership funding towards a larger Heritage Lottery Scheme currently being worked on by Ely Cathedral for enhancements to the entire cathedral precinct.

**Mandatory Disabled Facilities Grants**

These grants are provided to enable disabled people, including children, to remain in their own home. Due to an ageing population, the demand for this type of grant is likely to increase and capital funding will need to continue to enable the Council to meet this statutory function. Part grant funded from the Better Care Fund. The projected spend in 2020-21 includes an underspend from 2019-20 where work was committed, but not undertaken in year.

**Empty Properties, Discretionary DFGs, Minor Works & Home Repair Asst.**

Grant provided to owner occupiers on an income related benefit to carry out essential repairs and energy efficiency work to their homes, to ensure that they meet the decent homes standard. This grant takes two forms, one, a small non-repayable grant and the other, where more extensive works are needed, a repayable loan.

**Vehicle Replacements**

Vehicle replacement mostly for the Parks and Gardens Team. This is funded from CIL contributions.

**Intranet / HR / Payroll System Improvements**

Procurement and up-grade of a new HR and Finance systems and refreshing the intranet.

**Riverside Moorings**

Purchase of Riverside Moorings from the Environment Agency

**A14 Contributions**

When the A14 Improvement was originally planned, it was agreed that all councils in Cambridgeshire would contribute to the overall costs of the project. This budget reflect East Cambs element of this, which will be funded from CIL contributions.

**Extension to Country Park**

Purchase of land from the Environment Agency

## East Cambs Trading Company - Loan

Load funding to East Cambs Trading Company(ECTC). ECTC is wholly owned by the Council, and operates as a commercial enterprise, providing more opportunities to compete for contracts. Profits generated will be either returned to the Council, the sole shareholder as dividends, or ploughed back into the company to improve services. This loan is to provide working capital to the Company, as it develops residential housing at sites in Haddenham and the former Military of Defence site in Ely, the Company is expected to repay this loan in full in (or before) 2023.

SOURCES OF FINANCING	Projected 2020/21 £	Budget 2021/22 £	Budget 2022/23 £	Budget 2023/24 £	Budget 2024/25 £
<b>Operational Services</b>					
Revenue Contribution	89,187				
Grants (Disability Facilities Grant)	608,471	526,577	526,577	526,577	526,577
Capital Reserves	340,139	265,722	265,722	265,722	265,722
Section 106 / CIL	871,506	49,000	49,000	49,000	49,000
Borrowing	(742,923)	2,845,950			
<b>Operational Services Total</b>	<b>1,166,380</b>	<b>3,687,249</b>	<b>841,299</b>	<b>841,299</b>	<b>841,299</b>
<b>Finance and Assets</b>					
Capital Reserves	305,480				
Section 106 / CIL	163,200	40,000	40,000	40,000	40,000
Borrowing Company	7,080,000	100,000			
<b>Finance and Assets Total</b>	<b>7,548,680</b>	<b>140,000</b>	<b>40,000</b>	<b>40,000</b>	<b>40,000</b>
<b>Capital Funding Total</b>	<b>8,715,060</b>	<b>3,827,249</b>	<b>881,299</b>	<b>881,299</b>	<b>881,299</b>

Capital Reserves Forecast	2020/21 £	2021/22 £	2022/23 £	2023/24 £	2024/25 £
Balance Brought Forward	1,384,924	839,305	623,583	407,861	192,139
Add receipts from Sales of Assets	100,000	50,000	50,000	50,000	50,000
Less Capital Receipts Applied	(645,619)	(265,722)	(265,722)	(265,722)	(265,722)
<b>Capital Reserves Carried Forward</b>	<b>839,305</b>	<b>623,583</b>	<b>407,861</b>	<b>192,139</b>	<b>(23,583)</b>

Borrowing Forecast	2020/21 £	2021/22 £	2022/23 £	2023/24 £	2024/25 £
Balance Brought Forward	11,760,858	11,178,003	13,731,457	9,012,900	7,534,343
Add Borrowing in Year	6,337,077	2,945,950	0	0	0
Repayment from ECTC	(6,500,000)	0	(4,070,000)	(830,000)	0
Less Minimum Revenue Provision (MRP)	(419,932)	(392,496)	(648,557)	(648,557)	(648,557)
<b>Total Borrowing Carried Forward</b>	<b>11,178,003</b>	<b>13,731,457</b>	<b>9,012,900</b>	<b>7,534,343</b>	<b>6,885,786</b>
Internal Borrowing	11,178,003	13,731,457	9,012,900	7,534,343	6,885,786
External Borrowing	0	0	0	0	0

## Appendix 5

PARISH	COUNCIL TAX BASE Band D Eq Revised Band D for C/Tax discount scheme	2021-22	Band D
		PRECEPT £	Rate £
Ashley	223.3	18,650.00	83.52
Bottisham	842.7	48,250.00	57.33
Brinkley	155.2	9,244.00	59.58
Burrough Green	158.0		0.00
Burwell	2,380.5	162,357.00	68.22
Cheveley	910.4	80,000.00	87.93
Chippenham	214.4	10,606.00	49.50
Coveney	159.0	12,094.00	76.14
Dullingham	328.4	23,649.00	72.09
Ely, City of	6,988.2	613,419.00	87.84
Fordham	937.0	41,000.00	43.83
Haddenham	1,218.8	107,657.00	88.38
Isleham	813.5	101,939.00	125.37
Kennett	133.1	9,095.00	68.40
Kirtling and Upend	174.7	11,539.38	66.06
Little Downham	911.1	83,000.00	91.17
Little Thetford	254.2	17,250.00	67.86
Littleport	2,866.6	214,455.00	74.88
Lode	359.0	16,500.00	45.99
Mepal	348.7	37,300.00	107.01
Reach	134.3	11,552.63	86.04
Snailwell	78.9		0.00
Soham	3,701.8	412,000.00	111.33
Stetchworth	268.0	18,000.00	67.23
Stretham	670.7	70,000.00	104.40
Sutton	1,339.8	144,326.00	107.73
Swaffham Bulbeck	331.0	37,500.00	113.31
Swaffham Prior	354.0	14,500.00	41.04
Wentworth	65.7	7,800.00	118.80
Westley Waterless	62.1	1,000.00	16.11
Wicken	324.2		0.00
Wilburton	464.8		0.00
Witcham	159.7		0.00
Witchford	836.7	54,580.00	65.25
Wooditton	761.5	17,500.00	23.04
Whole Area/Average Tax Charge	29,930.00	2,406,763.01	

**EQUALITY, DIVERSITY & INCLUSION POLICY 2021-2024**

Committee: Finance & Assets Committee

Date: 25<sup>th</sup> January 2021

Author: Nicole Pema, HR Manager

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1.0 ISSUE

1.1 To formally adopt the Council's Draft Equality, Diversity and Inclusion Policy following a period of public consultation.

2.0 RECOMMENDATION(S)

2.1 Members are requested to formally adopt the draft Equality, Diversity and Inclusion Policy 2021-2024, as set out in Appendix 1.

3.0 BACKGROUND

3.1 Promoting and supporting diversity in the workplace is about valuing everyone as an individual. However, to reap the benefits of a diverse workforce it is vital to have an inclusive environment.

3.2 Inclusion is where people's differences are valued and everyone feels that they belong without having to conform, that their contribution matters and they are able to perform to their full potential, no matter their background, identity or circumstances.

3.3 The new Equality, Diversity and Inclusion Policy aims to expand on the Single Equality Scheme that was previously in place, and sets out the Council's commitment to an inclusive and supportive environment for staff, Members, contractors and visitors that is free from discrimination.

3.4 The draft policy was approved for consultation by the Finance and Assets Committee on 24 September 2020.

3.5 The consultation period ran from 28 September until 30 November 2020. Following the consultation period, the responses have been considered and, where appropriate, changes have been reflected in the amended draft at Appendix 1.

4.0 FINANCIAL IMPLICATIONS/EQUALITY IMPACT ASSESSMENT

4.1 There are no financial implications associated with this report.

4.2 An Equality Impact Assessment (EIA) is attached at Appendix 2.

## 5.0 APPENDICES

Appendix 1 – Draft Equality, Diversity & Inclusion Policy 2021-2024

Appendix 2 – Equality, Diversity & Inclusion Policy EIA

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<b><u>Background Documents</u></b>	<b><u>Location</u></b>	<b><u>Contact Officer</u></b>
ECDC Single Equality Scheme 2016-2020	Room	Nicole Pema
Local population data:	118, The	HR Manager
(1) <a href="#">Cambridgeshire Insight</a>	Grange,	(01353) 616325
(2) <a href="#">Office for National Statistics 2011 Census</a>	Ely	E-mail: nicole.pema@eastcambs.gov.uk
(3) <a href="#">ONS Survey on Sexual Orientation in the UK (2017)</a>		
(4) <a href="#">Gender Trust</a>		
<a href="#">Home Office Diversity and Inclusion Strategy 2018-2025</a>		
<a href="#">International Holocaust Remembrance Alliance (IHRA) definition of antisemitism</a>		
Equality Act 2010 guidance: <a href="http://www.gov.uk/guidance/equality-act-2010-guidance">www.gov.uk/guidance/equality-act-2010-guidance</a> <a href="http://www.equalityhumanrights.com/en/equality-act/equality-act-2010">www.equalityhumanrights.com/en/equality-act/equality-act-2010</a>		
Staff statistics and recruitment monitoring forms		
Consultation responses- 28 September until 30 November 2020		

**EQUALITY, DIVERSITY  
&  
INCLUSION POLICY  
2021 - 2024**



EAST CAMBRIDGE SHIRE  
DISTRICT COUNCIL

**EQUALITY, DIVERSITY & INCLUSION POLICY 2021-2024**

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## **1. OUR VISION FOR EQUALITY & INCLUSION IN EAST CAMBRIDGESHIRE**

As the district of East Cambridgeshire continues to grow and prosper, the population is becoming increasingly diverse.

The Council recognises and values the diversity of all people and communities in the district and in our workforce, and is committed to providing efficient, effective and relevant services to our residents and to ensuring that we are a good employer.

We welcome and celebrate diversity and the strengths that this brings to our communities and workforce.

The Council's vision is to improve the lives of our residents and to build a community where everyone has the opportunity to take part and be involved. This vision can only be realised through a true commitment by the Council and East Cambridgeshire's residents to promote diversity and ensure we recognise and celebrate difference within the context of fairness and equality.

Councillor Anna Bailey  
Leader of the Council

John Hill  
Chief Executive

## **2. OUR RESPONSIBILITIES**

As a public sector organisation, the Council has a statutory duty to ensure that equality and diversity are embedded into all its functions and activities as required by the Equality Act 2010. The Equality Act legally protects people from discrimination in the workplace and in wider society. It is underpinned by the public sector Equality Duty, which supports good decision-making by ensuring public bodies (and others providing public services) consider how different people will be affected by their activities, helping them to deliver policies and services which are efficient and effective, accessible to all and which meet different people's needs.

The Equality Act legally protects people from discrimination in the workplace and in wider society. It introduced 9 'protected characteristics', making it unlawful to discriminate against someone on the grounds of age, disability, race, sex, sexual orientation, gender re-assignment, marriage and civil partnership, religion or belief, and pregnancy or maternity (see Appendix 1).

The Equality Act introduced a Public Sector Equality Duty. This Duty includes the General Duty and the Specific Duties. The General Duty requires public bodies to consider how the decisions that they make, and the services they deliver, affect people who share different protected characteristics. The specific duties require public bodies to publish information to show they did this.

The General Duty has three main aims. It requires public bodies to have 'due regard' to:

- Eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Having due regard means consciously thinking about the three aims of the duty as part of the decision-making process. This means that consideration of equality issues must influence the decisions reached by the public bodies in ways that include in how they act as employers, how policies are developed, evaluated and reviewed, how services are designed, delivered and evaluated and how services are commissioned and procured from others.

Advancing equality of opportunity involves considering the need to remove or minimise disadvantage suffered by people due to their protected characteristics, meet the needs of these people and encourage people to participate in public life where participation is low from people within the protected characteristics.

Fostering good relations involves tackling prejudice and promoting understanding between people who share a protected characteristic and others. East Cambridgeshire District is a very rural district and people living outside the larger towns can find it difficult to access services. We will treat people fairly wherever they live and make sure they get the services they need.

### **3. MEETING OUR RESPONSIBILITIES**

To meet our equality responsibilities, the Council makes the following commitments:

- We will comply with Equality Act 2010 and any future equalities legislation.
- We will ensure Elected Members, employees, union representatives, volunteers, contractors, suppliers (and others as relevant) are made fully aware of the council's commitment to inclusion and diversity and how that affects their work.
- We will collect data on our service users and workforce and publish these annually (see Appendix 2).
- We will take proactive steps to reduce social, economic and geographical disadvantage or exclusion.
- We have adopted the International Holocaust Remembrance Alliance working definition of anti-Semitism. In adopting this definition we have undertaken to oppose all forms of anti-Semitism, hatred and harassment towards people who belong to the Jewish faith, and people with a Jewish ethnic or cultural background (see Appendix 3).
- We have committed to being an anti-racist organisation and we will actively work in partnership and stand together to end all forms of violence and racism.
- We will provide training/development and updates as appropriate.
- We will use information and talk to people to identify where inequality exists so that we can plan to tackle it.
- When it will help us to improve our services and understand how we are meeting our equality duties, we will ask questions about people's protected characteristics. We will always make it clear that people do not have to answer these questions and that they will still receive the services they need. We will keep personal data confidential.
- We will consider equality issues when we deliver our services.
- We will publish our equality objectives every four years, which will help us focus on some of the areas which we want to improve.
- When we think about changing our services, we will make sure that those people making the decisions know how the change could affect people with any of the protected characteristics. We will collect information about how people might be affected before making decisions. If the change might cause difficulties for people with a protected characteristic, we will do our best to find ways to reduce this impact. If we cannot do so, then we should think carefully about whether we need to make the change to achieve a legitimate aim.
- We have a duty to make reasonable changes to the way we do things so that disabled people can use our services and work for us. We recognise that everyone is different and we will treat people as individuals.
- We will make sure that anyone who provides a service for us treats people fairly. We will do this through our procurement process and by monitoring their work.
- We will recruit, select, train and promote staff fairly. We will try to ensure that the make-up of our staff matches that of our community. We will have clear systems for staff to complain if they are treated unfairly.
- We will make it easy for customers to complain if something goes wrong and we will respond quickly and efficiently.
- We will expect all employees to be responsible for their personal conduct and acceptable standards. If we find that an employee has disregarded our equality policy we will investigate and take disciplinary action, where appropriate.
- We will ensure that all information produced by the Council is available in a variety of formats including Braille, audio, large print and a variety of languages.

#### 4. WHAT WE ARE ALREADY DOING

- Providing accessible buildings and sites through dedicated disabled parking bays, ramps at entrances and exits, power assisted doors, accessible toilets, a hearing loop for people who are hearing impaired, and an accessible lift.
- Working alongside Living Sport to support sport opportunities for people with disabilities and special needs, so that everybody, regardless of disability or additional needs, can access sport or physical activity that suits them.
- Providing a range of leisure activities for the over 50s through the Mature and Active Programme to keep active and to maintain and improve their health and wellbeing.
- Promoting consultation and community engagement through the Council's Consultee Register.
- Providing translation services if a translation is required into another language or an alternative format, i.e. large print, Braille, audio cassette/CD: Translation Service
- Supporting the Cambridgeshire Equality Pledge with our local partners.
- Providing assisted collections to residents that are unable to put out their waste and recycling because of a serious long-term illness or disability.
- Providing a free of charge Clinical Waste collection service to collect and dispose of clinical waste which poses a threat of infection to humans.
- Offering assistance for Mandatory Disabled adaptations up to a maximum of £30,000 (subject to a test of resources): Disabled Adaptations
- Supporting and encouraging increased reporting of hate crime within the community at locations where victims of hate crime incidents feel safe and comfortable and specifically to extend the ways for victims of hate crime to access services through the development of 3rd party reporting centres. Currently in East Cambs there are two Hate Reporting Centres, one in Ely the other in Littleport. Our aim is to increase this to at least one Hate Reporting Centre in each Parish.
- Developing training packages for schools and businesses to prevent and deter hate crime/incidents by raising awareness of the impact of hate crime, consequences of perpetrating and building community cohesion across all communities. This will increase confidence in being able to report hate crime via the different methods available and raise awareness of local services that exist to protect and support victims and witnesses and challenge perpetrators.
- Providing advice and support for men and women affected by domestic violence (DV), including domestic abuse outreach sessions and a Domestic Violence Directory that lists contact details of organisations that can help individuals affected by this or those supporting people who are affected: Domestic Violence.
- Offering emergency refuge accommodation to women escaping abusive relationships through the Cambridge Women's Aid Refuge (CWA) and providing 'move-on' accommodation in the community for those leaving refuge.
- Providing support through the Community Hubs sited in various villages around East Cambridgeshire. The hub will provide people with support and will cover a range of topics from homelessness, debt and benefits to mental health issues and problems with anti-social behaviour.
- Delivering training and awareness to the workplace and schools through the Community Eyes and Ears Scheme, in relation to: Radicalisation, Hate Crimes, Modern Slavery, Cyber Crime and Scams, Neglect and Abuse, Exploitation, Abuse, Dementia and Loneliness.
- Producing a Live Safe leaflet for migrant workers because the district is attracting people as a place to live and work from across the world. Migrants can experience a number of different issues when working and living in the district and this leaflet informs them of their rights and responsibilities.

## 5. THE COUNCIL AS AN EMPLOYER

As an employer, we have a responsibility to understand the makeup of our workforce (see Appendix 4) and to meet the diverse needs of our employees. We also have a role to ensure that the workforce is equipped to meet the Council's commitment to promote equality, diversity and inclusion.

We are committed to promoting equality, **providing an inclusive workplace and eliminating any unfair treatment or unlawful discrimination**. This applies to all employment policies and practices including those relating to:

- Recruitment and selection, including promotion career progression;
- Terms and conditions of employment;
- Working environment;
- Training and development; and
- Redundancy and re-deployment.

We will achieve this by:

- Ensuring our recruitment and selection process is fair, consistent and transparent and that job opportunities are accessible to as wide and diverse an audience as possible.
- Providing a working environment where everyone is treated with dignity and respect, free from any form of inappropriate behaviour and one in which all employees can give of their best.
- Implementing reasonable adjustments in the workplace – in conjunction with the member of staff, line manager and Occupational Health (if required). We will endeavour to identify and meet different work-related needs such as providing physical adaptations or equipment and reviewing working arrangements for people with disabilities.
- Providing 'Work-life Balance' policies and guidance - including a range of flexible/alternative working patterns, parental leave and childcare scheme.
- Providing diversity awareness training.
- Monitoring the composition of the Council in line with statutory requirements (see Appendix 4). We will also monitor our recruitment process, from application to employment, to identify barriers.

**There may be times when we will treat people differently to strive for an equitable outcome. For example, requiring a job applicant to have a particular protected characteristic, where an occupational requirement applies, such as recruiting only women to a women's refuge.**

## 6. OUR EQUALITY OBJECTIVES FOR 2021-2024

The Council has identified the following equality objectives for the period 2021-2024.

1	As a <b>Community Leader</b> , we acknowledge with concern the published data on increases in hate crimes and crimes towards people with protected characteristics under the Equalities Act 2010. The Council condemns all forms of discrimination against all protected characteristics, and commits to ensuring that every resident of the District is treated with respect, dignity and in an equal manner.
2	As a <b>Service Provider</b> , we are committed to providing inclusive services which actively address inequality and exclusion by assessing the implications of our decisions on the whole community, to eliminate discrimination, tackle inequality, develop a better understanding of the community we serve, target resources efficiently, and adhere to the transparency and accountability element of the Public Sector Equality Duty.
3	As an <b>Employer</b> , we are committed to building an inclusive organisation where the workforce reflects the District we serve and where colleagues feel confident about being themselves in the workplace.

Underpinning each of these objectives is a set of actions and priorities that we will pursue. These are summarised in the Action Plan (see Appendix 5).

## **7. GATHERING DATA AND USING INFORMATION**

One of the duties that must be carried out by any public sector authority is the gathering of information. This includes information on the profile of the workforce, information on the profile of the resident population, and how people are affected by the Council's policies and practices both in employment and service delivery.

The Council has gathered and will continue to gather this information in the following ways:

- Local population data, e.g. Cambridgeshire Insight, Census statistics etc
- Staff statistics and recruitment monitoring forms
- Gender pay gap data
- Flexible working applications
- Applications for training and development
- HR monitoring data, e.g. grievance, disciplinary etc.
- Staff surveys
- Staff engagement workshops
- Customer satisfaction surveys
- Equality Impact Assessments (EIAs)

### **7.1 Consultation and Engagement**

The Council recognises the importance of consultation and engagement with the community, voluntary groups, stakeholders, local businesses and partners in the development and implementation of this policy in order that views can be considered and used to inform decision making.

Consultation took place between 28<sup>th</sup> September and 30<sup>th</sup> November 2020 on the new policy.

### **7.2 Equality Impact Assessment (EIAs)**

As part of any effective policy development process, it is important to consider any potential risks to those who will be affected by the policy's aims or by its implementation. The Equality Impact Assessment (EIA) process helps us to assess the implications of our decisions on the whole community, to eliminate discrimination, tackle inequality, develop a better understanding of the community we serve, target resources efficiently, and adhere to the transparency and accountability element of the Public Sector Equality Duty.

The word 'policy', in this context, includes the different things that the Council does. It includes any policy, procedure or practice - both in employment and service delivery. It also includes proposals for restructuring, redundancies and changes to service provision.

A checklist is available to guide Council officers through the impact assessment process (see Appendix 6). In the first instance, the officer would complete an Initial Screening Template (see Appendix 7) to scope the impact and decide whether a full impact assessment (EIA) is required. If this identified the need for a full impact assessment, then the officer would complete the detailed EIA Template (see Appendix 8).

The Council's Committee Report Template makes reference to equality impact assessments. If a new/revised policy is being presented to committee, the officer should use the committee report template to indicate if an impact assessment has or has not been completed. If an impact assessment has been completed, then a copy should be attached to the committee report. If the impact assessment identifies barriers, the officer's report should make reference to the main findings and any proposed mitigation actions so this can inform decision making.

The results of our Equality Impact Assessments are published on our website. Copies can also be made available on request.



## **APPENDIX 1 - The Protected Characteristics**

### **What are protected characteristics?**

It is against the law to discriminate against someone because of:

- [age](#)
- [disability](#)
- [gender reassignment](#)
- [marriage and civil partnership](#)
- [pregnancy and maternity](#)
- [race](#)
- [religion or belief](#)
- [sex](#)
- [sexual orientation](#)

These are called protected characteristics.

**You are protected under the [Equality Act 2010](#) from these types of discrimination.**

### **Age**

A person belonging to a particular age (for example 32 year olds) or range of ages (for example 18 to 30 year olds).

The Equality Act 2010 says that you must not be discriminated against because:

- you are (or are not) a certain age or in a certain age group
- someone thinks you are (or are not) a specific age or age group, this is known as discrimination by perception
- you are connected to someone of a specific age or age group, this is known as discrimination by association

Age groups can be quite wide (for example, 'people under 50' or 'under 18s'). They can also be quite specific (for example, 'people in their mid-40s'). Terms such as 'young person' and 'youthful' or 'elderly' and 'pensioner' can also indicate an age group.

See the Equality and Human Rights Commission (EHRC) advice and guidance on [age discrimination](#).

### **Disability**

In the Equality Act a disability means a physical or a mental condition which has a substantial and long-term impact on your ability to do normal day to day activities.

You are covered by the Equality Act if you have a progressive condition like HIV, cancer or multiple sclerosis, even if you are currently able to carry out normal day to day activities. You are protected as soon as you are diagnosed with a progressive condition.

You are also covered by the Equality Act if you had a disability in the past. For example, if you had a mental health condition in the past which lasted for over 12 months, but you

have now recovered, you are still protected from discrimination because of that disability.

Disability discrimination is when you are treated less well or put at a disadvantage for a reason that relates to your disability in one of the situations covered by the Equality Act.

The treatment could be a one-off action, the application of a rule or policy or the existence of physical or communication barriers which make accessing something difficult or impossible.

The discrimination does not have to be intentional to be unlawful.

The Equality Act 2010 says that you must not be discriminated against because:

- you have a disability
- someone thinks you have a disability (this is known as discrimination by perception)
- you are connected to someone with a disability (this is known as discrimination by association)

It is not unlawful discrimination to treat a disabled person more favourably than a non-disabled person.

See the EHRC [disability advice and guidance](#) section.

### **Gender reassignment**

The Equality Act 2010 says that you must not be discriminated against because you are transsexual, when your gender identity is different from the gender assigned to you when you were born. For example:

- a person who was born female decides to spend the rest of his life as a man

In the Equality Act it is known as gender reassignment. All transsexual people share the common characteristic of gender reassignment.

To be protected from gender reassignment discrimination, you do not need to have undergone any specific treatment or surgery to change from your birth sex to your preferred gender. This is because changing your physiological or other gender attributes is a personal process rather than a medical one.

You can be at any stage in the transition process – from proposing to reassign your gender, to undergoing a process to reassign your gender, or having completed it.

The Equality Act says that you must not be discriminated against because:

- of your gender reassignment as a transsexual. You may prefer the description transgender person or trans male or female. A wide range of people are included in the terms 'trans' or 'transgender' but you are not protected as transgender unless you propose to change your gender or have done so. For example, a group of men on a stag do who put on fancy dress as women are turned away from a restaurant. They are not transsexual so not protected from discrimination

- someone thinks you are transsexual, for example because you occasionally cross-dress or are gender variant (this is known as discrimination by perception)
- you are connected to a transsexual person, or someone wrongly thought to be transsexual (this is known as discrimination by association)

Intersex people (the term used to describe a variety of conditions in which a person is born with a reproductive or sexual anatomy that doesn't fit the typical definitions of female or male) are not explicitly protected from discrimination by the Equality Act, but you must not be discriminated against because of your gender or perceived gender. For example:

- if a woman with an intersex condition is refused entry to a women-only swimming pool because the attendants think her to be a man, this could be sex discrimination or disability discrimination

See the EHRC advice and guidance on [gender reassignment discrimination](#).

### **Marriage and civil partnership**

The Equality Act says you must not be discriminated against in employment because you are married or in a civil partnership.

In the Equality Act marriage and civil partnership means someone who is legally married or in a civil partnership. Marriage can either be between a man and a woman, or between partners of the same sex. Civil partnerships are available to both same-sex couples and opposite-sex couples.

People do not have this characteristic if they are:

- single
- living with someone as a couple neither married nor civil partners
- engaged to be married but not married
- divorced or a person whose civil partnership has been dissolved

See the EHRC advice and guidance on [marriage and civil partnership discrimination](#).

### **Pregnancy and maternity**

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Find out more about the EHRC work on [pregnancy and maternity in the workplace](#).

### **Race**

The Equality Act 2010 says you must not be discriminated against because of your race.

In the Equality Act, race can mean your colour, or your nationality (including your citizenship). It can also mean your ethnic or national origins, which may not be the same as your current nationality. For example, you may have Chinese national origins and be living in Britain with a British passport.

Race also covers ethnic and racial groups. This means a group of people who all share the same protected characteristic of ethnicity or race.

A racial group can be made up of two or more distinct racial groups, for example black Britons, British Asians, British Sikhs, British Jews, Romany Gypsies and Irish Travellers.

You may be discriminated against because of one or more aspects of your race, for example people born in Britain to Jamaican parents could be discriminated against because they are British citizens, or because of their Jamaican national origins.

See the EHRC advice and guidance on [race discrimination](#).

### **Religion and belief**

Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

See the EHRC guidance on [religion or belief at work](#).

### **Sex**

A man or a woman.

Sex discrimination is when you are treated differently because of your sex, in certain situations covered by the Equality Act 2010. The treatment could be a one-off action or could be caused by a rule or policy. It doesn't have to be intentional to be unlawful.

There are some circumstances when being treated differently due to sex is lawful.

See the EHRC [guidance on sex discrimination](#).

### **Sexual orientation**

Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

The Equality Act 2010 says you must not be discriminated against because:

- you are heterosexual, gay, lesbian or bisexual
- someone thinks you have a particular sexual orientation (this is known as discrimination by perception)
- you are connected to someone who has a particular sexual orientation (this is known as discrimination by association)

In the Equality Act, sexual orientation includes how you choose to express your sexual orientation, such as through your appearance or the places you visit.

See the EHRC advice and guidance on [sexual orientation discrimination](#).

## APPENDIX 2 - ABOUT EAST CAMBRIDGESHIRE AND THE COUNCIL

### Our Community

The District of East Cambridgeshire has the smallest population of the five districts within Cambridgeshire, estimated at approximately 89,362<sup>1</sup>.

The profile of the population is set out below:

Protected Characteristic		Variable	% of East Cambridgeshire Population
a)	Sex <sup>1</sup>	Females Males	50.9 49.1
b)	Age <sup>1</sup>	0-14 15-19 20-24 25-29 30-34 35-39 40-44 45-49 50-54 55-59 60-64 65-69 70-74 75-79 80-84 85+	18.6 5.3 4.2 4.9 5.9 7 6.7 7.5 7.5 6.6 5.8 5.5 5.5 3.6 2.7 2.7
c)	Ethnic Group <sup>2</sup>	White Mixed Asian Black Other	96.2 1.4 1.5 0.6 0.3
d)	Religion <sup>2</sup>	No religion Christian Muslim Buddhist Hindu Jewish Sikh Other Not stated	28.1 62.3 0.4 0.3 0.2 0.1 0.1 0.4 8.1

<sup>1</sup> Cambridgeshire Insight ([www.cambridgeshireinsight.org.uk](http://www.cambridgeshireinsight.org.uk))

<sup>2</sup> ONS 2011 Census

Protected Characteristic		Variable	% of East Cambridgeshire Population
e)	Disability <sup>2</sup>	Yes No	15.4 84.6
f)	Sexual Orientation <sup>3</sup>	N/a	There is no data on sexual orientation in East Cambridgeshire because it was not included in the 2011 UK Census. However, an ONS Survey on Sexual Orientation in the UK (2017), estimates that 2% of the population is gay, lesbian or bisexual.
g)	Gender Re-assignment <sup>4</sup>		No local data is available on the Gender Re-assignment and transsexual community in East Cambridgeshire. The Gender Trust estimates that 1% of an organisation's employees and service users may be experiencing some degree of gender variance.
h)	Marriage and Civil Partnership <sup>2</sup>		Persons aged 16+ (%)
		Single Married Civil Partnership Separated Divorced Widowed	27.1 54.9 0.3 2.4 8.7 6.6
i)	Pregnancy and Maternity <sup>2</sup>	Dependents No Dependents	30 70

### Travellers

With a tradition of seasonal agricultural work, the district has one of Britain's highest traveller populations. There are two Council Caravan Sites for travellers: (1) Earith Bridge (13 pitches); (2) Wentworth (8 pitches). Priority is given to local travellers who live in the district or have visited regularly over many years or have close family ties with travellers already living permanently in the district.

<sup>2</sup> [ONS 2011 Census](#)

<sup>3</sup> [ONS Survey on Sexual Orientation in the UK \(2017\)](#)

<sup>4</sup> [Gender Trust](#)

## APPENDIX 3 – ANTISEMITISM

The Council has joined with the Government and other local authorities across the UK in adopting the internationally recognised International Holocaust Remembrance Alliance (IHRA) definition of antisemitism, as follows:

**“Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.”**

Contemporary examples of antisemitism in public life, the media, schools, the workplace, and in the religious sphere could, taking into account the overall context, include, but are not limited to:

- Calling for, aiding, or justifying the killing or harming of Jews in the name of a radical ideology or an extremist view of religion.
- Making mendacious, dehumanizing, demonizing, or stereotypical allegations about Jews as such or the power of Jews as collective — such as, especially but not exclusively, the myth about a world Jewish conspiracy or of Jews controlling the media, economy, government or other societal institutions.
- Accusing Jews as a people of being responsible for real or imagined wrongdoing committed by a single Jewish person or group, or even for acts committed by non-Jews.
- Denying the fact, scope, mechanisms (e.g. gas chambers) or intentionality of the genocide of the Jewish people at the hands of National Socialist Germany and its supporters and accomplices during World War II (the Holocaust).
- Accusing the Jews as a people, or Israel as a state, of inventing or exaggerating the Holocaust.
- Accusing Jewish citizens of being more loyal to Israel, or to the alleged priorities of Jews worldwide, than to the interests of their own nations.
- Denying the Jewish people their right to self-determination, e.g., by claiming that the existence of a State of Israel is a racist endeavour.
- Applying double standards by requiring of it a behaviour not expected or demanded of any other democratic nation.
- Using the symbols and images associated with classic antisemitism (e.g., claims of Jews killing Jesus or blood libel) to characterize Israel or Israelis.
- Drawing comparisons of contemporary Israeli policy to that of the Nazis.
- Holding Jews collectively responsible for actions of the state of Israel.



## APPENDIX 4 – PROFILE OF THE COUNCIL’S WORKFORCE

The Council employs 188 staff (as at 31 December 2019), and the profile of the workforce can be summarised as follows:

- 127 (68%) are female and 61 (32%) are male.
- 3.2% consider themselves to have a disability.
- 94% are white, 3% are black and 3% are of mixed ethnic origin.
- 45% are Christian, 0.5% are Buddhist and the remainder have declined to state or are of no religion.
- 6.4% are aged 20-24, 13.3% are aged 25-34, 19.7% are aged 35-44, 32.9% are aged 45-54, 22.9% are aged 55-64, and 4.8% are 65 and over. The average age is 46.
- 7 females (70%) and 3 males (30%) make up the top 5% of earners.
- There are no Black, Asian and Minority Ethnic (BAME) staff or disabled employees at senior grades.
- As at 31 March 2019, the women’s mean hourly rate was £14.27 per hour, 6.1% lower than the male’s mean hourly rate of £15.20 per hour. In other words when comparing mean hourly rates, women earn £0.94 for every £1 that men earn.
- As at 31 March 2019, the women’s median hourly rate was £12.58 per hour, 4.7% lower than the male’s median hourly rate of £13.20 per hour. In other words when comparing median hourly rates, women earn £0.95 for every £1 that men earn.

**APPENDIX 5: Equality, Diversity & Inclusion Action Plan 2021-2024**

	Equality & Inclusion Objective	Action	Responsible Officer	Timescale
1.	As a <b>Community Leader</b> , we will:			
1.1	Work with other agencies to reduce the number of hate crimes and incidents	To ensure all hate recommendations, national guidance and good practice is implemented within East Cambridgeshire	Community Safety Officer	Ongoing
		To increase our number of Hate Reporting Centres to at least one in each Parish.	Community Safety Officer	March 2023
		To respond positively to allegations, signs and perceptions of hostility and hate, and to proactively check reports of hate crime and non-crime hate incidents to ensure that the appropriate action has been taken and that allegations are investigated in a consistent and proportionate manner.	CMT Council Members Communities and Partnerships Manager Community Safety Officer	Ongoing
		To ensure significant focus is placed on a partnership approach through our Multi Agency Meetings to tackling hate crime and therefore increasing confidence amongst communities while identifying any particular hard to reach community groups or potential challenges.	Community Safety Officer	Monthly at a District level through Problem Solving Group (PSG) and Quarterly at the County level through the Against Hate Strategic Group
		To monitor hate crime performance & review the progress through the CSP Delivery Group.	Community Safety Officer	By 31 <sup>st</sup> March each year

1.2	Understand the profile of our resident population and service users, and appreciate the changing nature of the District	Continue to collect and analyse statistical data on the local population	HR Manager Communities and Partnerships Manager Community Safety Officer	31 <sup>st</sup> December 2022 (for policy update)
		Improve how we gather, use and share information appropriately to better understand who lives in the district and be aware of their needs.	Communities and Partnerships Manager Community Safety Officer HR Manager	31 <sup>st</sup> December 2022 (for policy update)
		Monitor take up of information requested in other languages and formats	HR Manager	By 31 <sup>st</sup> March each year
1.3	Continue to work to improve access to and take-up of Council services from all residents and communities	Continue to assess the equality impacts of all decisions, policies and projects which have an impact on the public	Corporate Management Team (CMT) Service Leads Committee Report Authors	Ongoing
1.4	Improve the involvement and engagement of the diverse communities within the District, and ensure that all people are able to take an active role within the Council and the local community	Ensure the communities feel their views are taken into account	CMT Council Members Communities and Partnerships Manager Community Safety Officer	Ongoing
		Challenge negative views and promote more cohesive communities	CMT Council Members Communities and Partnerships Manager Community Safety Officer	Ongoing
1.5	Work together with community partners and local residents to confront racism, antisemitism and prejudice	Tackle unfair treatment and inappropriate behaviour to those with protected characteristics, experiencing discrimination, bullying and harassment	CMT Service Leads Council Members Local Partners	Ongoing
1.6	Ensure that corporate and service level structures are in	Provide strong leadership and ensure equality, diversity and inclusivity are	CMT Council Members Service Leads	Ongoing

	place to deliver and review the equalities agenda	embedded throughout the Council by Elected Members, Management and staff.	Staff	
		Ensure the Council has a compliant Equality, Diversity and Inclusion Policy in place	HR Manager	By December 2020 (and then 3 yearly)
		Commit publicly to improving the equality outcomes for the local community by continuing to support the Cambridgeshire Equality Pledge with our local partners	CMT Council Members Local Partners	Ongoing
		All Council publications to reflect a diverse community in terms of content and images	Reprographics Manager	Ongoing
		Ensure Council publications are available in accessible formats	Service Leads Customer Services Team	As required
2.	As a <b>Service Provider</b> , we will:			
2.1	Ensure that everyone entitled to its services are able to access them	Improve our communication and accessibility for all services users	CMT Service Leads Customer Services Team	Ongoing
		Encourage feedback, compliments as well as complaints, and respond to them	CMT Service Leads Customer Services Team	Ongoing
		Continue to provide accessible buildings, facilities and open spaces to improve access for disabled people	Open Spaces and Facilities Manager	Ongoing
2.2	Ensure our suppliers and contractors adhere to our equality and inclusion policy	Take all possible opportunities to ensure our suppliers and contractors take an active approach to contributing to our equalities and inclusion goals, including having standard terms in contracts with external suppliers that require adherence to the Council's Equality Policy.	CMT Service Leads Procurement Advisor	By 31 <sup>st</sup> March 2022

2.3	Consult with local residents and service users so that they feel empowered to influence decision making	Use the Council's Register of Consultees to give local residents, community groups the opportunity to get involved in local decision making	Communities & Partnerships Manager	Ongoing
3.	As an <b>Employer</b> , we will:			
3.1	Understand the profile of our workforce	Analyse available data to understand how representative the Council's workforce is and identify any issues that need to be addressed	HR Manager HR Support Officer	Every 3 years with Policy update
3.2	Ensure that the Council's policies and practices are non-discriminatory and compliant with Equalities legislation	Ensure our recruitment and selection process is fair, consistent and transparent and that job opportunities are accessible to as wide and diverse an audience as possible	Recruiting Managers HR	Ongoing
		Carry out EIAs on new and revised employment policies and publish them on the Council's website	HR Manager HR Support Officer	By 31 <sup>st</sup> March 2021
		Take seriously and act upon allegations of inappropriate language, situations or practices and investigate issues as soon as they arise, promptly at the root cause	CMT Service Leads Monitoring Officer	Ongoing
		Ensure that appropriate reasonable adjustments are being put in place for colleagues with disabilities, such as providing physical adaptations or equipment and reviewing working arrangements	Service Leads HR Manager HR Support Officer HR Administrator	Ongoing
3.3	Educate our workforce to improve understanding of barriers faced by particular groups so that all employees can help to remove these barriers	Ensure that all <b>Council staff and Members</b> undertake training in unconscious bias	HR Manager HR Support Officer HR Administrator	By <b>December</b> 2021

3.4	Public bodies subject to the specific duties of the Public Sector Equality Duty must publish information to show their compliance.	The Council will produce an Equality, Diversity and Inclusion Monitoring Report for the period 1 <sup>st</sup> April to 31 <sup>st</sup> March each year	HR Manager	Annually in September or October
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## **APPENDIX 6: EQUALITY IMPACT ASSESSMENTS (EIA) – A CHECKLIST FOR OFFICERS**

### **What is an Equality Impact Assessment (EIA)?**

As part of any effective policy development process, it is important to consider any potential risks to those who will be affected by the policy's aims or by its implementation. The Equality Impact Assessment (EIA) process helps us to assess the implications of our decisions on the whole community, to eliminate discrimination, tackle inequality, develop a better understanding of the community we serve, target resources efficiently, and adhere to the transparency and accountability element of the Public Sector Equality Duty.

**The word ‘policy’, in this context, includes the different things that the Council does. It includes any policy, procedure or practice - both in employment and service delivery. It also includes proposals for restructuring, redundancies and changes to service provision.**

Complete

<b>1</b>	<b><u>EIA - INITIAL SCREENING TEMPLATE</u></b>	<input type="checkbox"/>
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To be completed when developing a new or reviewing an existing policy. Use the Initial Screening Template (IST) to scope the impact and decide whether a full equality impact assessment (EIA) is required.

The following questions can help you to determine whether a full EIA is required:

- Does the policy affect service users or the wider community?
- Is it a major policy, with a significant effect on how functions are delivered?
- Will it have a significant effect on how other organisations operate?
- Does it involve a significant commitment of resources?
- Does it relate to an area where there are known inequalities, e.g. disabled people’s access to public transport etc?

If a full EIA is required, go to Stage 2. If not, your IST will need to be countersigned by your Service Lead Officer and forwarded to the HR Manager (go to Stage 3).

<b>2</b>	<b><u>EQUALITY IMPACT ASSESSMENT (EIA)</u></b>	<input type="checkbox"/>
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a)	Establish clear aims and objectives <i>Questions (a) to (b)</i>	<ul style="list-style-type: none"> <li>▪ What is the aim/purpose of the policy?</li> <li>▪ Who is the policy intended to benefit and how?</li> <li>▪ What outcomes do we want to achieve from the policy?</li> <li>▪ How will the policy be put into practice?</li> </ul>
b)	Gather information/data <i>Question (c)</i>	<ul style="list-style-type: none"> <li>▪ Is the EIA informed by any data? i.e. consultations, complaints, applications received, allocations/take-up, satisfaction/feedback data, access audits, census data, benchmarking, workforce profile etc.</li> </ul>
c)	Assess likely impact and opportunities to promote equality <i>Questions (d) to (g)</i>	<ul style="list-style-type: none"> <li>▪ What do you already know about equality impact or need?</li> <li>▪ Is there a higher or lower take-up by particular groups?</li> <li>▪ Have there been any demographic changes/trends locally?</li> <li>▪ Are there any barriers to accessing the policy or service?</li> <li>▪ Is there a differential impact on different groups?</li> <li>▪ Is the differential impact an adverse one?</li> <li>▪ Is the policy directly or indirectly discriminatory?</li> <li>▪ Is the policy intended to increase equality of opportunity through positive action?</li> </ul>

d)	Involvement and consultation <i>Questions (h) to (j)</i>	<ul style="list-style-type: none"> <li>▪ How have you engaged stakeholders in gathering evidence or testing the policy proposals? <i>The Consultation Register is available to assist staff in consulting with the Council's stakeholders.</i></li> <li>▪ Who was involved, how and when where they engaged?</li> <li>▪ Does the evidence show potential for differential impact?</li> <li>▪ How will you mitigate any negative impacts?</li> </ul>
e)	Make a judgement on the policy in light of data, alternatives and consultation <i>Questions (k) to (l)</i>	Option 1: <b>No major change</b> - the evidence shows that the policy is robust and no potential for discrimination.
Option 2: <b>Adjust the policy</b> - to remove barriers or to better promote equality.		
Option 3: <b>Continue the policy</b> - despite potential for adverse impact or missed opportunity to promote equality, provided you have satisfied yourself that it does not unlawfully discriminate.		
Option 4: <b>Stop and remove the policy</b> – if the policy shows adverse effects that cannot be justified.		

Your EIA will need to be countersigned by your Service Lead Officer and forwarded to the HR Manager.

<b>3</b>	<b>COMMITTEE REPORT (IF APPLICABLE)</b>	<input type="checkbox"/>
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If your new/revised policy is being presented to committee, you should use the committee report template to indicate if an impact assessment has or has not been completed. Attach a copy of the completed IST/EIA to the committee report. **If the IST/EIA identifies barriers, your report should make reference to the main findings and any proposed actions so this can inform decision making.**

<b>4</b>	<b>PUBLICATION OF EIA</b>	<input type="checkbox"/>
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The Council is committed to publishing the results of our EIAs on the Council's website. When the IST/EIA has been approved by Committee, then the final version should be forwarded to the HR Manager who will arrange for the documents to be published. You will need to send any background papers or appendices that are relevant. Copies of impact assessments can also be made available on request.

<b>5</b>	<b>MONITOR &amp; REVIEW</b>	<input type="checkbox"/>
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Impact assessments are an ongoing process that do not end once a document has been produced. A review that considers the actual impact of the policy should be undertaken no later than one year after its introduction. This is not repeating the IST/EIA, but going back to the original assessment and using the information and experience gained through implementation to check the findings and make any necessary adjustments.



**APPENDIX 7: EQUALITY IMPACT ASSESSMENT – INITIAL SCREENING TEMPLATE (IST)**

Initial screening needs to take place for all new/revised Council policies. The word ‘policy’, in this context, includes the different things that the Council does. It includes any policy, procedure or practice - both in employment and service delivery. It also includes proposals for restructuring, redundancies and changes to service provision. This stage must be completed at the earliest opportunity to determine whether it is necessary to undertake an EIA for this activity.

**Name of Policy:**

**Lead Officer (responsible for assessment):**

**Department:**

**Others Involved in the Assessment (i.e. peer review, external challenge):**

**Date Initial Screening Completed:**


(a) **What is the policy trying to achieve?** i.e. What is the aim/purpose of the policy? Is it affected by external drivers for change? What outcomes do we want to achieve from the policy? How will the policy be put into practice?

--

(b) **Who are its main beneficiaries?** i.e. who will be affected by the policy?

--

(c) **Is this assessment informed by any information or background data?** i.e. consultations, complaints, applications received, allocations/take-up, satisfaction rates, performance indicators, access audits, census data, benchmarking, workforce profile etc.

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(d) Does this policy have the potential to cause a positive or negative impact on different groups in the community, on the grounds of any of the protected characteristics (please tick all that apply):

<b>Ethnicity</b>	<input type="checkbox"/>	<b>Age</b>	<input type="checkbox"/>
<b>Sex</b>	<input type="checkbox"/>	<b>Religion or Belief</b>	<input type="checkbox"/>
<b>Disability</b>	<input type="checkbox"/>	<b>Sexual Orientation</b>	<input type="checkbox"/>
<b>Gender Reassignment</b>	<input type="checkbox"/>	<b>Marriage &amp; Civil Partnership</b>	<input type="checkbox"/>
<b>Pregnancy &amp; Maternity</b>	<input type="checkbox"/>		

**Please explain any impact identified:** i.e. What do you already know about equality impact or need? Is there any evidence that there is a higher or lower take-up by particular groups? Have there been any demographic changes or trends locally? Are there any barriers to accessing the policy or service?

<b>(e) Does the policy affect service users or the wider community?</b>	YES/NO/Na
<b>(f) Does the policy have a significant effect on how services are delivered?</b>	YES/NO/Na
<b>(g) Will it have a significant effect on how other organisations operate?</b>	YES/NO/Na
<b>(h) Does it involve a significant commitment of resources?</b>	YES/NO/Na
<b>(i) Does it relate to an area where there are known inequalities, e.g. disabled people's access to public transport etc?</b>	YES/NO/Na

If you have answered **YES** to any of the questions above, then it is necessary to proceed with a full equality impact assessment (EIA). If the answer is **NO**, then this judgement and your response to the above questions will need to be countersigned by your Service Lead Officer and then forwarded to the HR Manager.

**Signatures:**

**Completing Officer:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Service Lead Officer:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**APPENDIX 8: EQUALITY IMPACT ASSESSMENT (EIA) FORM**

Name of Policy:	
Lead Officer (responsible for assessment):	
Department:	
Others Involved in the Assessment (i.e. peer review, external challenge):	
Date EIA Completed:	

**What is an Equality Impact Assessment (EIA)?**

As part of any effective policy development process, it is important to consider any potential risks to those who will be affected by the policy's aims or by its implementation. The Equality Impact Assessment (EIA) process helps us to assess the implications of our decisions on the whole community, to eliminate discrimination, tackle inequality, develop a better understanding of the community we serve, target resources efficiently, and adhere to the transparency and accountability element of the Public Sector Equality Duty.

**The word 'policy', in this context, includes the different things that the Council does. It includes any policy, procedure or practice - both in employment and service delivery. It also includes proposals for restructuring, redundancies and changes to service provision.**

- (a) **What is the policy trying to achieve?** i.e. What is the aim/purpose of the policy? Is it affected by external drivers for change? What outcomes do we want to achieve from the policy? How will the policy be put into practice?

- (b) **Who are its main beneficiaries?** i.e. who will be affected by the policy?

- (c) **Is the EIA informed by any information or background data (quantitative or qualitative)?** i.e. consultations, complaints, applications received, allocations/take-up, satisfaction rates, performance indicators, access audits, census data, benchmarking, workforce profile etc.

**(d) Does this policy have the potential to cause a positive or negative impact on different groups in the community, on the grounds of any of the protected characteristics? (please tick all that apply)**

**Ethnicity**   
**Sex**   
**Disability**   
**Gender Reassignment**   
**Pregnancy & Maternity**

**Age**   
**Religion and Belief**   
**Sexual Orientation**   
**Marriage & Civil Partnership**

**Please explain any impact identified:** i.e. What do you already know about equality impact or need? Is there any evidence that there is a higher or lower take-up by particular groups? Have there been any demographic changes or trends locally? Are there any barriers to accessing the policy or service?

**(e) Does the policy have a differential impact on different groups?**

YES/NO/Na
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**(f) Is the impact *adverse* (i.e. less favourable)?**

YES/NO/Na
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**(g) Does it have the potential to disadvantage or discriminate unfairly against any of the groups in a way that is unlawful?**

YES/NO/Na
-----------

**(h) How have you engaged stakeholders in gathering evidence or testing the policy proposals? Who was involved, how and when where they engaged? Does the evidence show potential for differential impact? How will you mitigate any negative impacts? Where there is the potential for an adverse impact that cannot be addressed immediately, these should be highlighted in your recommendations and objectives at the end of the EIA.**

\* The Consultation Register is available to assist staff in consulting with the Council's stakeholders.

**(i) Summarise the findings of your research and/or consultation (please use a separate sheet if necessary).**

(j) **What are the risks associated with the policy in relation to differential impact and unmet needs/requirements?** i.e. reputation, financial, breach of legislation, service exclusion, lack of resources, lack of cooperation, insufficient budget etc.

--

(k) **Use the information gathered in the earlier stages of your EIA to make a judgement on whether there is the potential for the policy to result in unlawful discrimination or a less favourable impact on any group in the community, and what changes (if any) need to be made to the policy.**

Option 1:	No major change - the evidence shows that the policy is robust and no potential for discrimination.	
Option 2:	Adjust the policy - to remove barriers or to better promote equality.	
Option 3:	Continue the policy - despite potential for adverse impact or missed opportunity to promote equality, provided you have satisfied yourself that it does not unlawfully discriminate.	
Option 4:	Stop and remove the policy – if the policy shows adverse effects that cannot be justified.	

(l) **Where you have identified the potential for adverse impact, what action can be taken to remove or mitigate against the potential for the policy to unlawfully discriminate or impact less favourably on one or more communities in a way that cannot be justified?** Include key activities that are likely to have the greatest impact (max. 6). Identified actions should be specified in detail for the first year but there may be further longer term actions which need to be considered. To ensure that your actions are more than just a list of good intentions, include for each: the person responsible for its completion, a timescale for completion, any cost implications and how these will be addressed. It is essential that you incorporate these actions into your service plans.

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This completed EIA will need to be countersigned by your Service Lead Officer and forwarded to the HR Manager. All completed EIAs will be published on the Council's website to demonstrate to local people that the Council is actively engaged in tackling potential discrimination and improving its practices in relation to equalities.

**Signatures:**

**Completing Officer:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Service Lead Officer:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**EQUALITY IMPACT ASSESSMENT (EIA) FORM**

**Appendix 2**

<b>Name of Policy:</b>	Equality, Diversity & Inclusion Policy 2021-2024
<b>Lead Officer (responsible for assessment):</b>	Nicole Pema, HR Manager
<b>Department:</b>	HR
<b>Others Involved in the Assessment (i.e. peer review, external challenge):</b>	-
<b>Date EIA Completed:</b>	September 2020 (updated January 2021)

**What is an Equality Impact Assessment (EIA)?**

As part of any effective policy development process, it is important to consider any potential risks to those who will be affected by the policy's aims or by its implementation. The Equality Impact Assessment (EIA) process helps us to assess the implications of our decisions on the whole community, to eliminate discrimination, tackle inequality, develop a better understanding of the community we serve, target resources efficiently, and adhere to the transparency and accountability element of the Public Sector Equality Duty.

**The word 'policy', in this context, includes the different things that the Council does. It includes any policy, procedure or practice - both in employment and service delivery. It also includes proposals for restructuring, redundancies and changes to service provision.**

- (a) **What is the policy trying to achieve?** i.e. What is the aim/purpose of the policy? Is it affected by external drivers for change? What outcomes do we want to achieve from the policy? How will the policy be put into practice?

East Cambridgeshire District Council recognises the importance of equality, diversity and inclusion. We operate in an increasingly diverse community, and we understand that the people who provide and use our services have diverse characteristics and different experiences, needs and aspirations.

Understanding, valuing and effectively managing these differences ensures that our communities are places where people get on well together and prosper.

The Council acknowledges with concern the published data on increases in hate crimes and crimes towards people with protected characteristics under the Equalities Act 2010. The Council condemns all forms of discrimination against all protected characteristics, and commits to ensuring that every resident of the District is treated with respect, dignity and in an equal manner.

- The aims and principles underpinning our Equality, Diversity and Inclusion Policy are to:
- Meet the responsibilities placed on us by the equalities legislation, specifically, the Equality Act and the Public Sector Equality Duty.
  - Ensure that equality, diversity and inclusion issues influence decision making.
  - Identify what barriers people face and take steps to remove them.
  - Develop measures and actions to tackle discrimination.
  - Challenge discrimination against people who work for the Council or who use our services.
  - Raise staff awareness and understanding of these issues.

The Equality, Diversity and Inclusion Policy sets out the Council's commitment to an inclusive and supportive environment for staff, Members, contractors and visitors that is free from discrimination, where all are able to participate and where everyone has the opportunity to fulfil their potential. It promotes positive attitudes towards inclusivity and valuing diversity, and seeks to ensure that all who are subject to the Council's policies, practices and procedures are treated fairly.

The policy includes three objectives to help us become more inclusive. Underpinning each of these objectives is a set of actions and priorities that the Council will aim to follow to guide our work.

**(b) Who are its main beneficiaries?** i.e. who will be affected by the policy?

Local residents and businesses, community groups and associations, Council staff, Councillors, partner organisations and Parish Councils.

**(c) Is the EIA informed by any information or background data (quantitative or qualitative)? i.e. consultations, complaints, applications received, allocations/take-up, satisfaction rates, performance indicators, access audits, census data, benchmarking, workforce profile etc.**

The Equality, Diversity and Inclusion Policy and accompanying EIA is informed by the following:

- Local population data:
  - (1) Cambridgeshire Insight
  - (2) Office for National Statistics 2011 Census
  - (3) Office for National Statistics Survey on Sexual Orientation in the UK (2017)
  - (4) Gender Trust
- Public consultation responses
- Staff statistics and recruitment monitoring forms
- Home Office Diversity and Inclusion Strategy 2018-2025
- International Holocaust Remembrance Alliance (IHRA) definition of antisemitism
- Equality and Human Rights Commission guidance on the Equality Act 2010
- GOV.UK guidance on the Equality Act 2010
- The Council's Community Engagement Toolkit
- The Council's Corporate Plan
- Community Eyes and Ears Campaign
- The Council's Community Safety Plan

**(d) Does this policy have the potential to cause a positive or negative impact on different groups in the community, on the grounds of any of the protected characteristics?** (please tick all that apply)

<b>Ethnicity</b>	<input checked="" type="checkbox"/>	<b>Age</b>	<input checked="" type="checkbox"/>
<b>Gender</b>	<input checked="" type="checkbox"/>	<b>Religion and Belief</b>	<input checked="" type="checkbox"/>
<b>Disability</b>	<input checked="" type="checkbox"/>	<b>Sexual Orientation</b>	<input checked="" type="checkbox"/>
<b>Gender Reassignment</b>	<input checked="" type="checkbox"/>	<b>Marriage &amp; Civil Partnership</b>	<input checked="" type="checkbox"/>
<b>Pregnancy &amp; Maternity</b>	<input checked="" type="checkbox"/>		

**Please explain any impact identified:** i.e. What do you already know about equality impact or need? Is there any evidence that there is a higher or lower take-up by particular groups? Have there been any demographic changes or trends locally? Are there any barriers to accessing the policy or service?

The Policy aims to have a **positive** impact across all of the protected characteristics, ensuring that we:

- a) Meet the responsibilities placed on us by the equalities legislation.
- b) Take equality and inclusion issues into account when making decisions.
- c) Identify what barriers people face and take steps to remove them.
- d) Develop measures and actions to tackle discrimination.

- e) Challenge discrimination against people who work for the Council or who use our services.
- f) Raise staff awareness and understanding of these issues.

The District of East Cambridgeshire has the smallest population of the five districts within Cambridgeshire, estimated at approximately 89,362.

The profile of the population is set out below:

Protected Characteristic	Variable	% of Population
a) Sex	Females	50.9
	Males	49.1
b) Age	0-14	18.6
	15-19	5.3
	20-24	4.2
	25-29	4.9
	30-34	5.9
	35-39	7
	40-44	6.7
	45-49	7.5
	50-54	7.5
	55-59	6.6
	60-64	5.8
	65-69	5.5
	70-74	5.5
	75-79	3.6
80-84	2.7	
85+	2.7	
c) Ethnic Group	White	96.2
	Mixed	1.4
	Asian	1.5
	Black	0.6
	Other	0.3
d) Religion	No religion	28.1
	Christian	62.3
	Muslim	0.4
	Buddhist	0.3
	Hindu	0.2
	Jewish	0.1
	Sikh	0.1
	Other	0.4
Not stated	8.1	
e) Disability	Yes	15.4
	No	84.6
f) Sexual Orientation	N/a	There is no data on sexual orientation in East Cambridgeshire because it was not included in the 2011 UK Census. However, an ONS Survey on Sexual Orientation in the UK (2017), estimates that 2% of the population is gay, lesbian or bisexual.
g) Gender Re-assignment		No local data is available on the transgender and transsexual community in East



			Cambridgeshire. The Gender Trust estimates that 1% of an organisation's employees and service users may be experiencing some degree of gender variance.
h)	Marriage and Civil Partnership	Single Married Civil Partnership Separated Divorced Widowed	27.1 54.9 0.3 2.4 8.7 6.6
i)	Pregnancy and Maternity <sup>2</sup>	Dependents No Dependents	30 70

What the Council is already doing to meet our equality responsibilities:

- Providing accessible buildings and sites through dedicated disabled parking bays, ramps at entrances and exits, power assisted doors, accessible toilets, a hearing loop for people who are hearing impaired, and an accessible lift.
- Working alongside Living Sport to support sport opportunities for people with disabilities and special needs, so that everybody, regardless of disability or additional needs, can access sport or physical activity that suits them.
- Providing a range of leisure activities for the over 50s through the Mature and Active Programme to keep active and to maintain and improve their health and wellbeing.
- Promoting consultation and community engagement through the Council's Consultee Register.
- Providing translation services if a translation is required into another language or an alternative format, i.e. large print, Braille, audio cassette/CD: Translation Service
- Supporting the Cambridgeshire Equality Pledge with our local partners.
- Providing assisted collections to residents that are unable to put out their waste and recycling because of a serious long-term illness or disability.
- Providing a free of charge Clinical Waste collection service to collect and dispose of clinical waste which poses a threat of infection to humans.
- Offering assistance for Mandatory Disabled adaptations up to a maximum of £30,000 (subject to a test of resources): Disabled Adaptations
- Supporting and encouraging increased reporting of hate crime within the community at locations where victims of hate crime incidents feel safe and comfortable and specifically to extend the ways for victims of hate crime to access services through the development of 3rd party reporting centres. Currently in East Cambs there are two Hate Reporting Centres, one in Ely the other in Littleport. Our aim is to increase this to at least one Hate Reporting Centre in each Parish.
- Developing training packages for schools and businesses to prevent and deter hate crime/incidents by raising awareness of the impact of hate crime, consequences of perpetrating and building community cohesion across all communities. This will increase confidence in being able to report hate crime via the different methods available and raise awareness of local services that exist to protect and support victims and witnesses and challenge perpetrators.
- Providing advice and support for men and women affected by domestic violence (DV), including domestic abuse outreach sessions and a Domestic Violence Directory that lists contact details of organisations that can help individuals affected by this or those supporting people who are affected: Domestic Violence.

- Offering emergency refuge accommodation to women escaping abusive relationships through the Cambridge Women’s Aid Refuge (CWA) and providing 'move-on' accommodation in the community for those leaving refuge.
- Providing support through the Community Hubs sited in various villages around East Cambridgeshire. The hub will provide people with support and will cover a range of topics from homelessness, debt and benefits to mental health issues and problems with anti-social behaviour.
- Delivering training and awareness to the workplace and schools through the Community Eyes and Ears Scheme, in relation to: Radicalisation, Hate Crimes, Modern Slavery, Cyber Crime and Scams, Neglect and Abuse, Exploitation, Abuse, Dementia and Loneliness.
- Producing a Live Safe leaflet for migrant workers because the district is attracting people as a place to live and work from across the world. Migrants can experience a number of different issues when working and living in the district and this leaflet informs them of their rights and responsibilities.

**(e) Does the policy have a differential impact on different groups?**

**YES/NO/Na**

**(f) Is the impact *adverse* (i.e. less favourable)?**

**YES/NO/Na**

**(g) Does it have the potential to disadvantage or discriminate unfairly against any of the groups in a way that is unlawful?**

**YES/NO/Na**

**(h) How have you engaged stakeholders in gathering evidence or testing the policy proposals?** Who was involved, how and when where they engaged? Does the evidence show potential for differential impact? How will you mitigate any negative impacts? Where there is the potential for an adverse impact that cannot be addressed immediately, these should be highlighted in your recommendations and objectives at the end of the EIA.

A public consultation was launched in conjunction with National Inclusion Week. The consultation period ran from 28 September to 30 November 2020 to gather views on our new Equality, Diversity and Inclusion policy.

The opening of the consultation followed the agreement of the Finance and Assets committee on 24 September to progress into the consultation stage.

We approached approximately 60 voluntary and community groups and 35 Parish Councils to take part in the consultation.

\* The Consultation Register is available to assist staff in consulting with the Council’s stakeholders.

**(i) Summarise the findings of your research and/or consultation (please use a separate sheet if necessary).**

The findings from the consultation have been summarised in separate table.

**(j) What are the risks associated with the policy in relation to differential impact and unmet needs/requirements?** i.e. reputation, financial, breach of legislation, service exclusion, lack of resources, lack of cooperation, insufficient budget etc.

Potential risks of the Equality, Diversity and Inclusion Policy 2021-2024:

- Failing to comply with equality duties and/or other equalities legislation.
- Compliance notices and/or enforcement action being taken by the Equality and Human Rights Commission.
- Insufficient staff and/or lack of cooperation to take forward the Policy's actions and priorities.
- Financial consequences of enforcement action/non-compliance.
- Financial consequences of discrimination/harassment claims.
- Impact on the Council's reputation if we are not perceived as an 'equal opportunities employer'.
- Risk of service exclusion if we do not know who are hard-to-reach groups are and how to engage with them.

**(k) Use the information gathered in the earlier stages of your EIA to make a judgement on whether there is the potential for the policy to result in unlawful discrimination or a less favourable impact on any group in the community, and what changes (if any) need to be made to the policy.**

Option 1:	<b>No major change</b> - the evidence shows that the policy is robust and no potential for discrimination.	✓
Option 2:	<b>Adjust the policy</b> - to remove barriers or to better promote equality.	
Option 3:	<b>Continue the policy</b> - despite potential for adverse impact or missed opportunity to promote equality, provided you have satisfied yourself that it does not unlawfully discriminate.	
Option 4:	<b>Stop and remove the policy</b> – if the policy shows adverse effects that cannot be justified.	

**(l) Where you have identified the potential for adverse impact, what action can be taken to remove or mitigate against the potential for the policy to unlawfully discriminate or impact less favourably on one or more communities in a way that cannot be justified?** Include key activities that are likely to have the greatest impact (max. 6). Identified actions should be specified in detail for the first year but there may be further longer term actions which need to be considered. To ensure that your actions are more than just a list of good intentions, include for each: the person responsible for its completion, a timescale for completion, any cost implications and how these will be addressed. It is essential that you incorporate these actions into your service plans.

Not applicable.

This completed EIA will need to be countersigned by your Service Lead/Director and forwarded to the HR Manager.

**Signatures:**

**Completing Officer:** Nicole Pema **Date:** 13/01/2021

**Director:** Emma Grima **Date:** 13/01/2021

**IMPACTS OF COVID-19 ON EAST CAMBS BAME POPULATION**

Committee: Finance and Assets Committee

Date: 25 January 2021

Author: Lewis Bage

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1.0 **ISSUE**

- 1.1 To consider the findings of the East Cambs COVID-19 Black, Asian and Minority Ethnic (BAME) survey and agree the recommendations.

2.0 **RECOMMENDATIONS**

- (i) To approve the actions which were agreed by the COVID-19 Member Working Party at its meeting on the 25<sup>th</sup> November. The recommendations are in response to the findings of the survey (as set out in 4.3 of the report) and are:

- To gather details of local and national support and information that is aimed at assisting BAME communities.
- Development of existing East Cambs COVID-19 Coordination Hub webpages to ensure that support and assistance is available to East Cambs BAME communities including information and links to internal and external support and services for BAME communities and access to information in a variety of languages and translation services
- Compile a database of local networks available for BAME residents for engagement and signposting purposes including engagement with existing networks including Community Leaders, to further explore the issues raised via the survey.

3.0 **BACKGROUND**

- 3.1 Following a Public Health England report, which identified the disproportionate effect that COVID-19 has had on the BAME community and the impact on existing health inequalities, the Council has sought to understand the effects of COVID-19 on the local BAME community.
- 3.2 To achieve this, the Council carried out a survey in November 2020 that intended to identify the views of BAME communities in East Cambs and obtain feedback on the impacts of COVID-19 on their lives, as well as understanding details of any support or services accessed or demands for any future support requirements.
- 3.3 The survey was conducted at the time of the government's announcement to commence a second national lockdown. Therefore, it was deemed important and timely to obtain feedback from communities and promptly provide members of the COVID-19 working party with suggested additional actions to address any issues identified. The survey ran between 3<sup>rd</sup>-18<sup>th</sup> November 2020 and survey questions can be found at Appendix 1.

3.4 The survey was promoted on a range of local websites and a variety of social media platforms; and press releases were issued before and during the survey period. The survey was also shared with the district's community infrastructure organisation for distribution to local community groups.

#### 4.0 CONCLUSIONS

4.1 There were 13 responses to the survey.

4.2 The key survey findings were as follows:

- 12 of the respondents advised that their lives have been affected by COVID-19. The most common impact identified was working from home followed by mental health issues (including panic, fear, depression and increased anxiety). Other impacts included job and income loss; accessing childcare and related services (such as baby groups); difficulties accessing medical appointments; socialising; caring for relatives; travel issues (finding alternative modes of travel as oppose to using public transport and not being able to travel abroad); and concerns about the behaviour of others (such as hostile behaviours and feelings of being discriminated against).
- Four respondents advised that they had accessed support services in response to COVID-19 including health services (such as GP, health visitor, COVID-19 test and psychological services); Universal Credit and online shopping.
- Nine respondents felt that additional services could be of assistance either now or in the future. Services identified included translations of webpages in different languages, better access to mental health and social care services, financial assistance towards the costs of working from home and travelling using private transport. One respondent identified that better health, dental and retail provision in villages could be beneficial. Another respondent advised that additional information on the impacts of COVID-19 on BAME residents would be helpful to them.

4.3 In response to the survey findings, the Council could assist BAME communities by ensuring that relevant and current information is available and accessible, and the following actions are proposed to achieve this:

- Gather details of local and national support and information that is aimed at assisting BAME communities.
- Development of existing East Cambs COVID-19 Coordination Hub webpages to ensure that support and assistance is available to East Cambs BAME communities. This could include information and links to internal and external support and services for BAME communities as identified by the survey findings including access to information in a variety of languages and translation services.
- Compile a database of local networks available for BAME residents for engagement and signposting purposes. This will include engagement with existing networks including Community Leaders, to further explore the issues raised via the survey.

4.4 These actions were approved by the Council's COVID-19 Members Working Party on the 25<sup>th</sup> November.

5.0 FINANCIAL IMPLICATIONS/EQUALITY IMPACT ASSESSMENT/CARBON IMPACT ASSESSMENT

5.1 There are no financial implications arising from this report.

6.0 APPENDICES

6.1 Appendix 1 - BAME Survey Questions

6.2 Appendix 2 – EIA

6.3 Appendix 3 – CIA

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**Background Documents**

**Location**

The Grange  
Nutholt Lane  
Ely CB7 4EE

**Contact Officer**

Lewis Bage  
Communities and Partnerships Manager  
(01353) 616340  
E-mail:  
[lewis.bage@eastcambs.gov.uk](mailto:lewis.bage@eastcambs.gov.uk)

## **Appendix 1 - BAME Survey Questions**

1. Please indicate what village or town you live in
2. What is your ethnic group?
3. Please describe how COVID-19 has impacted your life and highlight any changes you have needed to make to live your life in these current circumstances.
4. Please outline any support or services that you have accessed in response to dealing with the COVID-19 pandemic.
5. Please let us know of any support or services that could be beneficial to you either now or in the future.

**EQUALITY IMPACT ASSESSMENT (EIA) FORM**

**APPENDIX 2**

<b>Name of Policy:</b>	Impacts of Covid-19 on East Cambs BAME Population
<b>Lead Officer (responsible for assessment):</b>	Lewis Bage
<b>Department:</b>	Communities and Partnerships
<b>Others Involved in the Assessment (i.e. peer review, external challenge):</b>	
<b>Date EIA Completed:</b>	13.01.2021

**What is an Equality Impact Assessment (EIA)?**

As part of any effective policy development process, it is important to consider any potential risks to those who will be affected by the policy's aims or by its implementation. The Equality Impact Assessment (EIA) process helps us to assess the implications of our decisions on the whole community, to eliminate discrimination, tackle inequality, develop a better understanding of the community we serve, target resources efficiently, and adhere to the transparency and accountability element of the Public Sector Equality Duty.

**The word 'policy', in this context, includes the different things that the Council does. It includes any policy, procedure or practice - both in employment and service delivery. It also includes proposals for restructuring, redundancies and changes to service provision.**

- (a) **What is the policy trying to achieve?** i.e. What is the aim/purpose of the policy? Is it affected by external drivers for change? What outcomes do we want to achieve from the policy? How will the policy be put into practice?

To address COVID-19 related matters identified by local BAME residents via a survey

- (b) **Who are its main beneficiaries?** i.e. who will be affected by the policy?

Local BAME residents

- (c) **Is the EIA informed by any information or background data (quantitative or qualitative)?** i.e. consultations, complaints, applications received, allocations/take-up, satisfaction rates, performance indicators, access audits, census data, benchmarking, workforce profile etc.

Survey carried out and findings used to inform report recommendations

- (d) **Does this policy have the potential to cause a positive or negative impact on different groups in the community, on the grounds of any of the protected characteristics?** (please tick all that apply)

<b>Ethnicity</b>	<input checked="" type="checkbox"/>	<b>Age</b>	<input checked="" type="checkbox"/>
<b>Gender</b>	<input checked="" type="checkbox"/>	<b>Religion and Belief</b>	<input checked="" type="checkbox"/>
<b>Disability</b>	<input checked="" type="checkbox"/>	<b>Sexual Orientation</b>	<input checked="" type="checkbox"/>
<b>Gender Reassignment</b>	<input checked="" type="checkbox"/>	<b>Marriage &amp; Civil Partnership</b>	<input checked="" type="checkbox"/>
<b>Pregnancy &amp; Maternity</b>	<input checked="" type="checkbox"/>	<b>Caring Responsibilities</b>	<input checked="" type="checkbox"/>

**Please explain any impact identified:** i.e. What do you already know about equality impact or need? Is there any evidence that there is a higher or lower take-up by particular groups? Have there



been any demographic changes or trends locally? Are there any barriers to accessing the policy or service?

Recommendations seek to address matters identified in a positive way. Specific issues identified can also be explored further.

**(e) Does the policy have a differential impact on different groups?**

YES/NO/Na

**(f) Is the impact adverse (i.e. less favourable)?**

YES/NO/Na

**(g) Does it have the potential to disadvantage or discriminate unfairly against any of the groups in a way that is unlawful?**

YES/NO/Na

**(h) How have you engaged stakeholders in gathering evidence or testing the policy proposals?** Who was involved, how and when where they engaged? Does the evidence show potential for differential impact? How will you mitigate any negative impacts? Where there is the potential for an adverse impact that cannot be addressed immediately, these should be highlighted in your recommendations and objectives at the end of the EIA.

Local survey conducted to gather views of BAME residents

\* The Consultation Register is available to assist staff in consulting with the Council's stakeholders.

**(i) Summarise the findings of your research and/or consultation (please use a separate sheet if necessary).**

Findings outlined at 4.2 of committee report

**(j) What are the risks associated with the policy in relation to differential impact and unmet needs/requirements?** i.e. reputation, financial, breach of legislation, service exclusion, lack of resources, lack of cooperation, insufficient budget etc.

If actions are not implemented there is potential that issues identified may remain

**(k) Use the information gathered in the earlier stages of your EIA to make a judgement on whether there is the potential for the policy to result in unlawful discrimination or a less favourable impact on any group in the community, and what changes (if any) need to be made to the policy.**

Option 1:	No major change - the evidence shows that the policy is robust and no potential for discrimination.	x
Option 2:	Adjust the policy - to remove barriers or to better promote equality.	
Option 3:	Continue the policy - despite potential for adverse impact or missed opportunity to promote equality, provided you have satisfied yourself that it does not unlawfully discriminate.	
Option 4:	Stop and remove the policy – if the policy shows adverse effects that cannot be justified.	

- (I) Where you have identified the potential for adverse impact, what action can be taken to remove or mitigate against the potential for the policy to unlawfully discriminate or impact less favourably on one or more communities in a way that cannot be justified?** Include key activities that are likely to have the greatest impact (max. 6). Identified actions should be specified in detail for the first year but there may be further longer term actions which need to be considered. To ensure that your actions are more than just a list of good intentions, include for each: the person responsible for its completion, a timescale for completion, any cost implications and how these will be addressed. It is essential that you incorporate these actions into your service plans.

N/A

This completed EIA will need to be countersigned by your Head of Service. **Please forward completed and signed forms to the Principal HR Officer.**

All completed EIAs will need to be scrutinised and verified by the Council's Equal Opportunities Working Group (EOWG) and published on the Council's Intranet to demonstrate to local people that the Council is actively engaged in tackling potential discrimination and improving its practices in relation to equalities. Please be aware that you may be asked to attend a half-an-hour session to summarise the findings of the EIA to the Scrutiny and Verification panel.

**Signatures:**

**Completing Officer:** Lewis Bage **Date:** 13.01.2021

**Head of Service:** \_\_\_\_\_ **Date:** \_\_\_\_\_

## V1 (Cfte Reports Jan 2020 onwards)

**ECDC Carbon Impact Assessment:**

Once complete, this CIA should be sent to Richard Kay ([richard.kay@eastcambs.gov.uk](mailto:richard.kay@eastcambs.gov.uk)) for review prior to including a summary of this CIA within your committee report.

Please provide a brief description of the policy/decision including the proposed outcomes?

To consider the findings of the East Cambs COVID-19 Black, Asian and Minority Ethnic (BAME) survey and agree the recommendations.

RECOMMENDATIONS

- (i) To approve the actions which were agreed by the COVID-19 Member Working Party at its meeting on the 25<sup>th</sup> November. The recommendations are in response to the findings of the survey (as set out in 4.3 of the report) and are:
- To gather details of local and national support and information that is aimed at assisting BAME communities.
  - Development of existing East Cambs COVID-19 Coordination Hub webpages to ensure that support and assistance is available to East Cambs BAME communities including information and links to internal and external support and services for BAME communities and access to information in a variety of languages and translation services
  - Compile a database of local networks available for BAME residents for engagement and signposting purposes including engagement with existing networks including Community Leaders, to further explore the issues raised via the survey.

Now consider whether any of the following aspects will be affected. Many are likely to be ticked 'neutral':

Aspect	Likely climate effect:			Commentary
	+ve	-ve	neutral	
The council's energy consumption via buildings (electricity, gas, oil). Tick +ve if consumption will reduce.			√	
The council's energy consumption via travel (eg petrol). Tick +ve if consumption will reduce.			√	
The councils water usage (especially hot water). Tick +ve if consumption will reduce.			√	
Creation of renewable energy. Tick +ve if it increases renewable			√	

energy production. Tick – ve if renewable energy is lost.				
Carbon offsetting – will the proposal offset carbon emissions such as through tree planting. Tick +ve if yes.			√	
Reducing carbon emissions through amending ongoing activities not covered above eg management of land, such as peat soils, in a way which reduces carbon dioxide emissions. Tick +ve if yes.			√	
If the project involves the creation or acquisition of a building, has the energy rating been considered? Are / will measures be included to make the building energy efficient, beyond basic building regulation or other legal requirements? Tick +ve if yes.			√	
Embodied energy - does your project/proposal include construction of buildings or other significant infrastructure? If no, then tick neutral. If yes, have genuine efforts been made to minimise the <i>embodied energy</i> * in the materials being used for that construction, and the source of such materials? If so, tick +ve.			√	

**What information is available to help the carbon impacts identified above to be quantified?**

(e.g. this might be a estimation of energy consumption provided by a constructor, an estimate of distance travelled to a new site etc.)

**Can any negative outcomes be justified as appropriate or necessary?**

N/A

**Are any remedial or mitigation actions required?**

No

**Once implemented, will you monitor the actual impact of any +ve or -ve outcomes? Yes / No. If so, how?**

N/A

**Overall summary to be included in your covering report (i.e. what you put in this box should be replicated in your committee report, and therefore should provide the overall summary of the carbon impact, in language suitable for being placed in the public domain).**

There are no positive or negative carbon impact implications arising.

<b>Assessment completed by (name and position)</b>	Lewis Bage Communities and Partnerships Manager
<b>Date CIA completed</b>	13.01.2021
<b>Approved by Richard Kay</b>	13.01.2021

\*Embodied energy is the energy used (and therefore carbon dioxide or other greenhouse gases emitted) during the manufacture, transport and construction of building materials. So for example, if you are specifying concrete on a project then carbon dioxide (or equivalent) will have been emitted making that concrete. Different materials have high and low levels of embodied energy, with low being good. Not only can different materials have different embodied energy values, but the same material can also have differing embodied energy values depending on where it was sourced and transported. For example, stone sourced from China would have a far greater embodied energy within it than the same stone sourced locally, due to the carbon dioxide emitted during transportation. By way of examples, using stainless steel will likely have over 10 times more embodied energy within it, per kg, than timber.

Notes of a remote meeting of the Covid-19 Working Party held on  
Wednesday, 25 November 2020 at 5.00pm.

**PRESENT**

Cllr Sue Austen  
Cllr Ian Bovingdon (Chairman)  
Cllr Charlotte Cane  
Cllr Lis Every  
Cllr Jo Webber

**OFFICERS**

Jo Brooks – Director Operations  
Lewis Bage – Communities & Partnership Manager  
Martin Smith – Business Programme Manager  
Tracy Couper – Democratic Services Manager

**IN ATTENDANCE**

Cllr Joshua Schumann

**1. APOLOGIES**

An apology for absence was received from Councillor Matthew Downey.

**2. DECLARATIONS OF INTEREST**

No declarations of interests were received.

**3. NOTES OF PREVIOUS MEETING**

It was agreed:

That the Notes of the meeting held on 30 September 2020 be received.

**4. CHAIRMAN'S ANNOUNCEMENTS**

The Chairman thanked Jo Brooks and her Team for the excellent work that they had been undertaking in response to the Covid-19 pandemic and the recovery. He highlighted media reports that there was new information or pronouncements on the issue from Central Government every 37 minutes!

The Chairman stated his view that Jo and her Team had demonstrated that they were responding effectively to the pandemic and recovery in this ever-changing climate, to provide assistance and support to the vulnerable and community groups that required it. Regular Briefing Papers were being issued to all Councillors providing useful information on current initiatives. The

Chairman believed that this Working Party had raised important issues and concerns and made recommendations on these to Finance and Assets Committee. However, once the two outstanding issues had been discussed this evening, he considered that the Working Party would have concluded its role and could be disbanded to allow officers to focus on the ongoing recovery work. To demonstrate the ongoing work being undertaken, the Chairman asked the Director Operations, Jo Brooks, to give an update on activities since the last Working Party meeting. Jo Brooks updated the Working Party as follows:

'It has and continues to be non-stop for the recovery group who as you know have developed a comprehensive recovery plan and a local outbreak plan, both of which I have shared with you, based on the needs of our communities and local epidemiology. We are currently awaiting news on what tier this District will be in and on the local vaccination programme.

I would like to share with a flavour of the of the work we have been doing to support local communities:

- Working with community groups to ensure no one goes hungry because they do not have access to food or cannot do their own food shopping or is sick because they cannot collect their medication. (36 residents 3/8/2020 to date)
- Providing digital assistance to those who are unable to use online services to ensure they get the benefits and financial support they are entitled to. (42 residents to date)
- Contacting the clinically extremely vulnerable to identify any support they may need and advise of the support available to them
- Administered, signposted and delivered the following government support packages to
  - Businesses
  - ensure no child goes hungry during the school holidays
  - prevent hardship to those have been requested to self-isolate by NHS Test and Trace or required to self-isolate
- developed a Communication plan to encourage the residents to keep up the good work, maintain the low infection rates throughout the district and protect loved-ones a and the NHS this includes:
  - Publication of national messages on Refuse Trucks and Council Vans to extend communication throughout the district
  - An exciting let's protect East Cambs Christmas plan, providing alternative ways to have fun and enjoy Christmas with family and friends – examples include
    - providing a digital list of festive alternatives for all residents and households to enjoy i.e. a virtual Santa's grotto, call from Santa;
    - using the Council's already formed circular walks to create a festive trail and support parish councils to create similar alternatives in their communities;

- Countdown to Christmas promoting the work of our community hubs community groups and the help they have provided this year.
- Developed a template to enable Parish Councils to develop their own COVID-19 response and recovery plans.
- Written to local businesses and provided posters for them to encourage staff to follow the guidance at all times particularly break times and chatting with colleagues.
- Written to every business and provided posters for them to encourage staff to follow the guidance at all times particularly break times and chatting with colleagues.
- We are joined by Public Health at our Recovery meetings to consider weekly surveillance data. We have been allocated a member of the data analysis team to enable us to drill down into areas of higher infection to look at the profile of population so we can target communications where infection rates are higher.
- Developing a Communications Plan based upon our announced tier and a Vaccination Plan identifying potential local vaccination sites and volunteer staffing, in conjunction with our NHS partners.'

The Chairman asked that the thanks of the Working Party be formally recorded and conveyed to Officers for all their work and informative updates on the actions requested by the Working Party.

## **5. IMPACTS OF COVID-19 ON EAST CAMBRIDGESHIRE BAME POPULATION**

Members received a report detailing the findings from the survey of the impact of Covid-19 on the Black, Asian and Minority Ethnic (BAME) community within East Cambs. The Communities and Partnerships Manager, Lewis Bage, reported that the survey had been conducted between 3 to 18 November 2020 and the majority of the responses received mirrored the same concerns expressed by the wider community. The survey results and recommendations arising therefrom detailed in paragraphs 4.2 and 4.3 of the submitted report, would be submitted to the Finance and Assets Committee in January 2021.

In response to a question by the Chairman, Mr Bage reported that at least 9 of the 13 responses received appeared to be from individuals rather than groups, as they included language in the first person.

With regard to the recommendation to develop the East Cambs Co-Ordination Hub webpages to include BAME information, guidance and links, the Director Operations confirmed that this would include information and videos in different languages.



A Member referred to the comment regarding hostile behaviour/discrimination and asked if there was further information on this. Mr Bage stated that the comment had been very vague, referring to a sense of this rather than a particular incident.

Mr Bage confirmed that a list of community leaders/groups in the District was being compiled and that further engagement would be made with these. The Chairman suggested that this be added to the recommendations in paragraph 4.3 of the report before it was submitted to Finance and Assets Committee.

A Member also suggested that ongoing monitoring and initiatives were required due to the likely impacts of the pandemic on people's mental health.

It was AGREED:

- (i) That the findings from the survey of the impact of Covid-19 on the Black, Asian and Minority Ethnic (BAME) community within East Cambs be noted.
- (ii) **That the recommended actions set out in paragraph 4.3 of the report be submitted to Finance and Assets Committee.**

## **6. COVID-19 BUSINESS SURVEY RESULTS**

Members received a report detailing the results of the Enterprise East Cambridgeshire Covid-19 Business Survey. Martin Smith, Business Programme Manager, explained the context for the survey that took place over the period 10 September to 16 October. The survey was part of the Council's work with the Business Recovery Group and the responses received were handled by a single officer, in order that a consistent sense of the overall message could be obtained. The survey had not been limited to questions relating to Covid-19, but included questions on Brexit and other key issues faced by local businesses.

A total of 136 responses had been received out of approx. 2,000 local businesses. It was difficult to assess what could be considered as a reasonable level of response, but factors such as closure and furloughing of staff; the requirement for an operational response to the pandemic; and fatigue at the number of surveys/returns required from businesses, meant that this could be considered a reasonable level of return. In addition, the nature of the responses gave a good snapshot of the situation at that point in time and contained no surprises in terms of the impacts experienced. Key issues/concerns included:

- affect on future viability and cash reserves
- affect on skills and training
- need for ongoing support and assistance

These in turn led to recommendations in two keys areas:

Identifying and signposting business to relevant support via key local, regional and national agencies

Work with Central Government, Combined Authority and Chamber of Commerce/Federation of Small Businesses on grant streams and specialist good practice solutions for both Covid-19 and Brexit.

A great deal had been learned from the survey and it was intended to conduct a more focussed follow-up survey in the first quarter of the New Year, as part of the recovery phase.

The Chairman stated that he was reassured that the survey responses were largely what would have been expected and that the key role for the Council was one of signposting and assistance. He commented that it would be important to learn the good-practice lessons from those businesses adapting effectively to the changing circumstances arising from Covid-19 and Brexit.

A Member highlighted the importance of co-ordinating with and sharing the results of surveys being carried out by other agencies. It also was vital to address the issue of how to support training and skills in the recovery phase, as Covid-19 would have a disproportionate impact on the employment prospects of younger people. Finally, the provision of adequate broadband and mobile phone coverage within the District needed to remain at the forefront of the recovery agenda, due to the greater level of home and flexible working resulting from Covid-19. Mr Smith referred to the Connecting Cambridgeshire Strategy for this District published recently and agreed to provide the link to Working Party Members.

## **7. FUTURE WORK PROGRAMME**

Further to earlier discussions, the Chairman thanked the Working Party for its valuable work and stated that he envisaged this being its last meeting, with all operational and briefing responsibilities being transferred to the Director Operations and any residual reporting requirements to Finance and Assets Committee.

A Member disagreed that the Working Party had completed its work at this stage and could be disbanded.

The meeting closed at 17:45pm

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**COMMUNITY INFRASTRUCTURE LEVY & SECTION 106: INCOME & EXPENDITURE 2019/20**

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Committee: Finance & Assets Committee

Date: 25 January 2021

Author: Director Commercial

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1.0 **ISSUE**

1.1 To receive information relating to Community Infrastructure Levy and Section 106 income and expenditure.

2.0 **RECOMMENDATION(S)**

2.1 Members are requested to note the publication of the Annual Infrastructure Funding Statement as detailed in Appendix 1.

3.0 **BACKGROUND/OPTIONS**

3.1 Local Authorities are now required under amendments to regulations (The Community Infrastructure Levy (Amendment) (England) Regulations 2019 No.1103 that came into force 1 September 2019) to produce an Infrastructure Funding Statement annually that sets out details about planning obligation receipts and anticipated expenditure. This is to provide clarity and transparency to local communities and developers on the infrastructure and expenditure and in aligning this to planned development, as envisaged in the Local Plan.

3.2 The Infrastructure Funding Statement (IFS) is an annual report required to be published by December each year, which provides a summary of the financial and non-financial developer contributions relating to Section 106 Legal Agreements (S106) and the Community Infrastructure Levy (CIL) within East Cambridgeshire District Council for a given financial year.

4.0 **ARGUMENTS/CONCLUSIONS**

4.1 The Council has published, on its website, the Annual Infrastructure Funding Statement for 2019/20. This is provided for information at Appendix 1.

5.0 **FINANCIAL IMPLICATIONS/EQUALITY IMPACT ASSESSMENT/CARBON IMPACT ASSESSMENT**

5.1 There are no financial implications arising from this report.

5.2 Equality Impact Assessment (EIA) not required.

5.3 Carbon Impact Assessment (CIA) not required.

6.0 APPENDICES

6.1 Appendix 1 - Annual Infrastructure Funding Statement 2019/20

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<b><u>Background Documents</u></b>	<b><u>Location</u></b>	<b><u>Contact Officer</u></b>
None	The Grange, Ely	Emma Grima Director Commercial (01353) 665555 E-mail: <a href="mailto:emma.grima@eastcambs.gov.uk">emma.grima@eastcambs.gov.uk</a>



**East Cambridgeshire  
District Council  
Annual Infrastructure  
Funding Statement  
For  
Community Infrastructure Levy and  
Section 106**

**Reporting Period:  
From 01 April 2019 to 31 March 2020**

## Introduction

Local Authorities are now required under amendments to regulations (The Community Infrastructure Levy (Amendment) (England) Regulations 2019 No.1103 that came into force 1 September 2019) to produce an Infrastructure Funding Statement annually that sets out details about planning obligation receipts and anticipated expenditure. This is to provide clarity and transparency to local communities and developers on the infrastructure and expenditure and in aligning this to planned development, as envisaged in the Local Plan.

- 1.1 The Infrastructure Funding Statement (IFS) is an annual report required to be published by 31 December each year, which provides a summary of the financial and non-financial developer contributions relating to Section 106 Legal Agreements (S106) and the Community Infrastructure Levy (CIL) within East Cambridgeshire District Council for a given financial year.
- 1.2 It also includes a statement of infrastructure projects that East Cambridgeshire District Council intends to be, or may be, wholly or partly funded by CIL,

## Developer Contributions

### Section 106 Planning Obligations

- 1.3 Planning Obligations (also known as S106 Agreements) are legal agreements which can be attached to a planning permission to mitigate the impact of an otherwise unacceptable development to make it acceptable in planning terms.
- 1.4 Obligations can only be sought where they are directly related to the development, fairly and reasonably related in scale and kind to the development, and necessary to make the development acceptable in planning terms.
- 1.5 S106 contributions can either be provided on-site, for example through the provision of affordable housing, or off-site in the form of financial payments.

### Community infrastructure Levy (CIL)

- 1.6 In contrast to S106 obligations, CIL is intended to fund more generalised infrastructure requirements across the District in order to support new development. It is a mechanism to secure financial contributions from developers on certain viable developments. CIL monies can be used to fund the provision, improvement, replacement, operation or maintenance of infrastructure to support the development of the area.
- 1.7 CIL rates must be set out via a published charging schedule. The Council's charging schedule was adopted in February 2013; most recently amended in January 2020. Further information can be found on the following webpage: <https://www.eastcambs.gov.uk/planning/calculating-and-paying-cil>

## Section 278 Highway Agreements

- 1.8 Additional legal agreements that can fund infrastructure are Section 278 Agreements (S278). These are legally binding agreements made under the Highways Act 1990 between Local Highway Authorities and Developers. S278 agreements are required to ensure that the road networks are able to cope with new development. These obligations are dealt with and reported by Cambridgeshire County Council. The Council will look at the possibility of including information for S278 agreements within future versions of the IFS.

## Community Infrastructure Levy Matters

### Community Infrastructure Levy Regulations (2019 Amendment) Regulation 121A Schedule 2 Section 1

- a) The total value of demand notices issued in the reported period is £2,089,740.59.

Of total value the amount from Liability Notices (liable floorspace after any relief that has been granted) is £2,085,926.75. The total value is from surcharges imposed due to breaches of the Community Infrastructure Levy Regulations is £3,813.84 and the total value of the late payment interest accrued is £0.00.

- b) The total amount of CIL collected within the reported period totals £4,953,222.40.

- c) The amount of CIL collected prior to the reported period totals £8,910,180.38. Of this total the following amount was collected in Cash and as Land Transactions (including payments in kind and infrastructure payments) and the following amounts remain unallocated:

Type	Received	Unallocated
<b>Cash</b>	£8,910,180.38	£0.00
<b>Land Payment</b>	£0.00	£0.00

- d) The total amount of CIL collected prior to the reported period allocated in the reported period in relation to cash received is £7,170,457.56 and in relation to land payments (including payments in kind and infrastructure payments) is £0.00.

- e) The total CIL expenditure recorded for the reported period is as follows:

Type	Expenditure
<b>Admin CIL</b>	£150,000.00
<b>Neighbourhood CIL</b>	£628,031.01
<b>CIL Land Payments</b>	£0.00
<b>Other CIL Cash</b>	£3,248,932.28
<b>Total Value</b>	£4,026,963.29

- f) The total amount of CIL allocated and not spent during the reported period is as follows, this does not include allocations made within the reported year that have been fully spent:

Type	Allocated	Spent	Remaining
<b>Admin CIL</b>	£150,000.00	£150,000.00	£0.00
<b>Neighbourhood CIL</b>	£628,031.01	£628,031.01	£0.00
<b>CIL Land Payments</b>	£0.00	£0.00	£0.00
<b>Other CIL Cash</b>	£3,051,344.51	£3,051,344.51	£0.00

- g) i) The items of infrastructure on which CIL (including land payments) has been spent within the reported year, and the amount of CIL spent on each item is as follows:



Infrastructure	Date	Amount	Description
<b>New Littleport Secondary</b>	31 March 2020	£594,349.09	*Includes Third Party spending
<b>District Leisure Centre</b>	31 March 2020	£1,832,441.43	*Includes Third Party spending
<b>Burwell PC Rec Ground Improvement Project</b>	18 June 2019 to 26 November 2019	£197,587.77	*Includes Third Party spending
<b>Ely Museum Redevelopment project</b>	15 May 2019	£165,000.00	*Includes Third Party spending
<b>The Mill Project Soham</b>	31 March 2020	£280,000.00	*Includes Third Party spending
<b>Ely Southern Bypass</b>	31 March 2020	£179,553.99	*Includes Third Party spending

ii) The amount of CIL spent on repaying money borrowed, including any interest, and details of the items of infrastructure which that money was used to provide (wholly or in part) is as follows:

Date	Amount Used	Loan/Interest	Infrastructure Funded
-	0.00	0.00	-

iii) The amount of CIL collected towards administration expenses is £247,661.12. This was 5% of the total CIL receipts collected (£4,953,222.40) in the reported period.

East Cambridgeshire District Council has set a collection percentage of 5.00%. The percentage taken may differ due to Land payments (including payments in kind and infrastructure payments) not being allocated to administration expenses, Surcharges and Late Payment Interest not being split with Neighbourhood Areas.

The amount of CIL spent on administration expenses during the reported year was £150,000.00. This was 3.03% of the total CIL collected within the reported year.

h) Regarding CIL collected and allocated within the reported year that has not been spent, summary details of what has been allocated, is remaining to be spent and what it has been allocated towards is as follows:

Infrastructure	Amount Allocated	Amount Unspent	Allocation Dated
-	0.00	0.00	-

i) i) The total amount of CIL passed to a neighbourhood zone under Regulation 59A (collected on behalf of the neighbourhood zone in cash), cash collected and allocated towards Neighbourhood CIL, and 59B (cash provided by the Charging Authority to Neighbourhood Zones equivalent to what they would have received on a payment in kind), are as follows:

Zone	Date	Amount Passed
<b>Burrough Green</b>	19 April 2019	£4,402.83
<b>Burrough Green</b>	22 October 2019	£1,043.70
<b>Burwell</b>	19 April 2019	£28,310.17

Zone	Date	Amount Passed
Burwell	22 October 2019	£1,983.96
Cheveley	19 April 2019	£5,120.65
Cheveley	22 October 2019	£12,833.18
Dullingham	22 October 2019	£3,215.02
Ely	19 April 2019	£51,421.93
Ely	22 October 2019	£191,556.44
Fordham	19 April 2019	£2,590.12
Fordham	22 October 2019	£15,669.39
Haddenham	19 April 2019	£3,851.25
Haddenham	22 October 2019	£4,092.51
Isleham	19 April 2019	£15,786.48
Isleham	22 October 2019	£10,175.79
Kirtling	19 April 2019	£9,726.16
Kirtling	22 October 2019	£8,823.34
Little Downham	19 April 2019	£1,814.39
Little Downham	22 October 2019	£3,661.15
Little Thetford	19 April 2019	£31,512.59
Little Thetford	22 October 2019	£1,162.50
Littleport	19 April 2019	£150.00
Littleport	22 October 2019	£8,119.04
Mepal	19 April 2019	£6,356.33
Mepal	22 October 2019	£4,441.45
Soham	19 April 2019	£10,720.05
Soham	22 October 2019	£4,417.53
Stretham	19 April 2019	£18,213.43
Stretham	22 October 2019	£19,245.40
Sutton	22 October 2019	£24,291.97
Swaffham Bulbeck	19 April 2019	£6,194.54
Swaffham Prior	19 April 2019	£428.13
Wicken	19 April 2019	£1,985.12
Wicken	22 October 2019	£7,033.35
Wilburton	19 April 2019	£5,629.77
Wilburton	22 October 2019	£5,207.55
Witcham	19 April 2019	£4,480.38
Witcham	22 October 2019	£2,055.33
Witchford	19 April 2019	£40,205.84
Witchford	22 October 2019	£43,736.08
Woodditton	19 April 2019	£1,591.54
Woodditton	22 October 2019	£4,774.63

The following amounts were allocated towards neighbourhood zones under Regulation 59B, cash provided by the Charging Authority to Neighbourhood Zones equivalent to what they would have received on a payment in kind, during the reported year:

Zone	Amount	Date	Re-allocated from
-	0.00	-	-

ii) The following spends within the reported year have been passed to a third party to spend on the provision, improvement, replacement, operation or maintenance of infrastructure under Regulation 59(4):

Infrastructure	Amount	Date
Burwell PC Rec Ground Improvement Project	£37,097.50	18 June 2019
Burwell PC Rec Ground Improvement Project	£79,045.00	09 July 2019
Burwell PC Rec Ground Improvement Project	£48,922.50	09 July 2019
Burwell PC Rec Ground Improvement Project	£32,522.77	26 November 2019
The Mill Project Soham	£280,000.00	31 March 2020
New Littleport Secondary	£594,349.09	31 March 2020
Ely Museum Redevelopment project	£165,000.00	15 May 2019

j) i) The total collected by East Cambridgeshire District Council for the reported year under Regulation 59E (CIL returned to the Charging Authority after 5 years if not spent) was £0.00 and under Regulation 59F, CIL collected and retained by the Charging Authority for areas that are not designated Neighbourhood Zones, was £0.00.

ii) The amount of CIL allocated during the reported year under Regulation 59E, CIL returned to the Charging Authority that had been passed to a Neighbourhood Zone and had not been applied to infrastructure after a 5 year period, during the reported year is as follows:

Infrastructure	Neighbourhood Zone	Amount	Date
-	-	0.00	-

The amount of CIL spent under Regulation 59E during the reported year is as follows:

Infrastructure	Amount	Date	Spend Description
-	0.00	-	-

The amount of CIL allocated during the reported year under Regulation 59F during the reported year is as follows:

Infrastructure	Neighbourhood Zone	Amount	Date
-	-	0.00	-

The amount of CIL spent under Regulation 59F during the reported year is as follows:

Infrastructure	Amount	Date	Spend Description

k) i) The amount of CIL requested under Regulation 59E for the reported year is as follows per neighbourhood zone:

Neighbourhood Zone	Amount Requested
-	0.00

ii) The amount of CIL still outstanding for recovery under Regulation 59E at the end of the reported year for all years is as follows for each neighbourhood zone:

Neighbourhood Zone	Amount Outstanding
-	0.00

- l) i) The amount of CIL collected, not assigned for Neighbourhood CIL or CIL Administration, for the reported year and that had not been spent is £669,558.86.
- ii) The amount of CIL collected, not assigned for Neighbourhood CIL or CIL Administration, from 01 February 2013 to the end of the reported year that had not been spent is £2,263,056.53.
- iii) The amount CIL collected and that had not been spent under Regulations 59E and 59F during the reported year are as follows:

Type	Retained
<b>Regulation 59E</b>	£0.00
<b>Regulation 59F</b>	£0.00

iv) The amount of CIL collected from 01 February 2013 to the end of the reported year under Regulations 59E and 59F that has not been spent is as follows:

Type	Retained
<b>Regulation 59E</b>	£0.00
<b>Regulation 59F</b>	£0.00

# EAST CAMBRIDGESHIRE DISTRICT COUNCIL COMMUNITY INFRASTRUCTURE LEVY

## INFRASTRUCTURE LIST

The East Cambridgeshire District Council Infrastructure List is set out below (As approved by Council in October 2019).

This list is in no particular order and no priorities have been identified.

Littleport Schools  
District Leisure Centre  
Soham Railway Station  
Ely Southern Bypass  
Health Facilities Serving North Ely Development  
A142/Witchford Road Roundabout  
Children's Centre Serving North Ely Development  
Ely Country Park Expansion  
Staploe Medical Centre  
Ely Commuter Car Park  
Wicken-Soham-Ely Cycle Path  
Witchford Household Recycling Centre  
Burwell Parish Council Recreation Ground Improvement Project  
Ely Museum Redevelopment  
The Mill Project- Soham  
Sutton GP Surgery Extension  
Stretham GP Surgery  
Soham Village College  
Libraries Serving Kennett Development  
Traffic Calming Serving Kennett Development  
B1056 Crossroads  
Village Green Serving Kennett Development

## Section 106 Matters

All figures here relate to the monies received and spent by East Cambridgeshire District Council. In some instances, contributions/provisions are obligations to external bodies including Cambridgeshire County Council (CCC). CCC will be producing its own Infrastructure Funding Statement (IFS).

### Community Infrastructure Levy Regulations (2019 Amendment) Regulation 121A Schedule 2 Section 3

- a) The total amount of money to be provided under any planning obligations which were entered during the reported year is £2,022,978.08. This figure does not consider indexation (inflation/deflation) that may be applied when the money becomes due.
- b) The total amount of money received from planning obligations during the reported year was £197,803.99.
- c) The total amount of money received prior to the reported year that has not been allocated is £1,541,069.11.
- d) During the reported year the following non-monetary contributions have been agreed under planning obligations:
  - i) 165 dwellings were granted permission on FUL and RMM applications in 2019/20.
  - ii) The following education provisions have been agreed under S106 agreements:

Education Type	Number of school places
-	-

The following education provisions have been funded by offsite S106 and other funding sources allocated during the reported year:

Education Type	Number of school places	Funding Source
-	-	-

Education items will be reported in the Cambridgeshire County Council report.

Summary details of all non-monetary obligations agreed within the reported year are as follows:

Covenant Type/Service	Deed Signed	Planning Application
<b>Development Restriction/</b>	18/04/2019	18/00853/OUT
<b>Development Restriction/</b>	18/04/2019	18/00853/OUT
<b>Discharge of Covenants/</b>	18/04/2019	18/00853/OUT
<b>Discharge of Covenants/</b>	18/04/2019	18/00853/OUT
<b>Variation or Supplement/</b>	30/04/2019	16/01772/FUM
<b>Other/ECDC</b>	02/07/2019	19/00340/FUL
<b>Other/ECDC</b>	02/07/2019	19/00340/FUL
<b>Other/ECDC</b>	04/06/2019	16/01804/FUM
<b>Affordable Housing Provision/</b>	04/06/2019	16/01804/FUM

<b>Self build provision/ECDC</b>	23/04/2019	18/00820/OUM
<b>Self build provision/ECDC</b>	23/04/2019	18/00820/OUM
<b>Public Open Space Provision/</b>	23/04/2019	18/00820/OUM
<b>Affordable Housing Provision/</b>	23/04/2019	18/00820/OUM
<b>Other/ECDC</b>	24/07/2019	16/01166/OUM
<b>Affordable Housing Provision/</b>	24/07/2019	16/01166/OUM
<b>Allotments/ECDC</b>	24/07/2019	16/01166/OUM
<b>Landscaping Contribution/</b>	24/07/2019	16/01166/OUM
<b>SPD Open Space Contribution/</b>	24/07/2019	16/01166/OUM
<b>SPD SAM buffer contribution/ECDC</b>	24/07/2019	16/01166/OUM
<b>Other/ECDC</b>	28/11/2019	18/00579/ESF
<b>Other/ECDC</b>	28/10/2019	18/01338/FUL
<b>Occupation Restriction/</b>	28/10/2019	18/01338/FUL
<b>Affordable Housing Provision/</b>	18/11/2019	18/01433/FUM
<b>Self build provision/ECDC</b>	30/10/2019	15/01175/OUM
<b>Public Open Space Contribution/</b>	30/10/2019	15/01175/OUM
<b>Affordable Housing Provision/</b>	28/10/2019	18/00393/OUM
<b>Self build provision/ECDC</b>	28/10/2019	18/00393/OUM
<b>Off site SUDS maintenance contribution/ECDC</b>	28/10/2019	18/00393/OUM
<b>Other/ECDC</b>	28/10/2019	18/00393/OUM
<b>Affordable Housing Provision/</b>	19/12/2019	19/00180/OUM
<b>Affordable Housing Provision/</b>	30/04/2019	19/00239/VARM
<b>Other/ECDC</b>	28/01/2020	18/01435/OUM
<b>Affordable Housing Provision/</b>	28/01/2020	18/01435/OUM
<b>Footway Provision/</b>	28/01/2020	18/01435/OUM
<b>Public Open Space Provision/</b>	28/01/2020	18/01435/OUM
<b>Affordable Housing Provision/</b>	31/01/2020	17/00757/ESO
<b>Self build provision/ECDC</b>	31/01/2020	17/00757/ESO
<b>Public Open Space Provision/</b>	06/02/2020	18/01821/FUM
<b>Affordable Housing Provision/</b>	06/02/2020	18/01821/FUM
<b>Affordable Housing Provision/</b>	24/02/2020	18/00059/FUM
<b>Other/ECDC</b>	17/03/2020	19/00371/FUL
<b>Wheeled bin waste contribution/ECDC</b>	08/04/2019	17/00880/OUM
<b>Affordable Housing Provision/</b>	19/03/2020	13/01165/OUM

- e) The total amount of money from planning obligations allocated towards infrastructure during the reported year was £16,466.93. Of this amount £0.00 was not spent during the reported year.
- f) The total amount of money from planning obligations spent during the reported year was £294,281.32. Of this amount £0.00 was spent by a third party on behalf of East Cambridgeshire District Council.
- g) The following items have had money allocated towards them during the reported year with unspent allocations:

Infrastructure	Allocated	Unspent
<b>Bus Services Contribution</b>	£12,500	£12,500
<b>Waste Bins</b>	£1,017.28	£1,017.28

- h) In relation to money which was spent by East Cambridgeshire District Council during the reported year:

- i) The items of infrastructure that planning obligation money has been spent on and the amount spent are as follows:

Infrastructure	Spent
<b>Local Project Sutton Public Open Space</b>	£765.00
<b>Local Project Burwell Community Infrastructure</b>	£7,707.90
<b>Local Project Mepal Community Infrastructure</b>	£0.11
<b>Local Project Lode Community Infrastructure</b>	£1,202.05
<b>Country Park</b>	£9,054.73
<b>Strategic Public Open Space</b>	£36,781.23
<b>Strategic Community Infrastructure</b>	£52,847.30
<b>Public Open Space Maintenance</b>	£120,414.53
<b>Littleport Local TCI</b>	£3,112.64
<b>POS Maintenance Trees</b>	£45,928.90
<b>Employment</b>	£15,134.53
<b>Leisure</b>	£1,332.40

- ii) The amount of planning obligation money spent on repaying money borrowed, including any interest, with details of the items of infrastructure which that money was used to provide are as follows:

Date	Amount Used	Loan/Interest	Infrastructure Funded
-	-	-	-

- iii) The amount of planning obligation money spent in respect of administration of planning obligations and monitoring in relation to the delivery of planning obligations during the reported year was £0.00.

- i) The total amount of money retained at the end of the reported year is £2,325,806.04. Of this amount retained an amount of £0.00 has been retained for long term maintenance. Please see the below table for a breakdown of the retained maintenance amount.



Description	Amount
<b>Total collected for long term maintenance</b>	£0.00
<b>Total allocated towards maintenance</b>	£0.00
<b>Total spent on maintenance</b>	£0.00

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**FINANCE REPORT**

Committee: Finance & Assets Committee

Date: 25<sup>th</sup> January 2021

Author: Finance Manager

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1. ISSUE

- 1.1 This report provides Members with budget monitoring information for services under the Finance & Assets Committee and then, as part of its corporate remit, for the Council as a whole.

2. RECOMMENDATION (S)

- 2.1 Members are requested to note:

- The Finance and Assets Committee has a projected yearend underspend of £224,000 when compared to its approved revenue budget of £5,021,167.
- That overall the Council has a projected yearend underspend of £428,500 when compared to its approved revenue budget of £13,644,206.
- That this Committee has an expected underspend of £500,000 when compared with its approved capital budget of £8,048,680.
- That the overall position for the Council on Capital is a projected outturn of £8,715,060, which is an underspend of £3,155,950 when compared to its revised budget of £11,871,010.

3. BACKGROUND / OPTIONS

- 3.1 Under Financial Regulations, each policy committee is required to consider projections of financial performance against both its revenue and capital budget on a quarterly basis, with this Committee further considering the overall Council position.
- 3.2 This is the third report for the 2020/21 financial year and details actual expenditure incurred and income received as at 31<sup>st</sup> December 2020 and projections as to the yearend position at this time.
- 3.3 Appendix 1 details the overall revenue position for both this Committee and the Council overall. In appendix 1 the budgets under the stewardship of this Committee are shown in detail, with then the position for the Operational Services Committee and the funding lines shown in summary.

- 3.4 The detailed revenue budget position for the Operational Services Committee is shown in appendix 2. A report was presented to Operational Services Committee on the 18<sup>th</sup> January 2021 providing an explanation for the yearend forecasts being projected at this time.
- 3.5 With regard to Finance & Assets Committee, the significant variances of actual spend compared to profiled budgeted spend at the end of December 2020, where no variance is forecast for yearend, are detailed below:

<b>Service</b>	<b>Variance £</b>	<b>Explanation</b>
Cost of Other Elections	(£40,170)	Roll over of income from 2019/20 to fund future elections.
Depot Services	£52,076	Recharged to the Trading Company in January 2021.
Museum (Old Gaol) Mepal Outdoor Centre	£23,254 £12,119	These cost centres contain asset management costs, which will be funded as part of the year end process.
Economic Development	(£48,549)	Income for Littleport Wi-Fi from Cambridgeshire County Council (£34,970) has been received in advance, but costs will continue to be incurred throughout the year. There are also staff savings, although these are to some part, matched by a reduction in income during the first nine months of the year.
Housing Strategy	(£134,762)	Staff Savings accrued in the first nine months of 2020/21, although one vacancy has now been filled. An accrual is also still outstanding for an old invoice.
Local Plans	(£90,735)	There remains an outstanding accrual from last year that hasn't yet been paid. Consultant's costs for quarter three will be paid in the next quarter, while any grant income received will be rolled forward if not spent in year.
Parking of Vehicles	£165,784	Parking fee income over the first five months of the year was virtually nil and while it picked up in the latter part of the 2020 calendar year it remained well below expectations due to Covid-19. The expectation is that the various Government Covid grants will be used to bring this service back into balance at yearend.

COVID-19	(£3,769,609)	This mostly reflects the significant amount of Government grant provided to us to support local businesses during the Covid-19 pandemic. Also, on this line is the non-ring fenced grant provided to us by Government, which will be allocated out to spending departments at yearend, such as parking of vehicles as above.
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3.6 Explanations for the forecast yearend variances reported for Finance and Assets Committee are detailed in the below table:

Service	Variance £	Explanation
Land Charges Legal	(£25,000) (£15,000)	Savings have been made due to a staff vacancy and Legal income has increased this year beyond the anticipated budgeted level. Further the temporary measure put in place by Government to freeze stamp duty until 31 <sup>st</sup> March 2021 has caused an increased amount of fees for Land Charges.
Interest & Financial Transactions	(£43,000)	It is now anticipated that ECTC will be borrowing more from the Council in 2020/21 than had been forecast in the budget, pre-Covid-19, and therefore the interest receipts received by the Council will increase.
Housing Benefits	£30,000	The budgeted amount reflects the mid-year position in 2019/20 (the last available information when the budget was built) while actual now reflects the mid-year position for 2020/21.
General Gang	(£30,000)	Staff Savings as a result of one member of staff leaving and another being seconded to another section
Finance	£20,000	We had to purchase additional Agresso licences following an audit of our usage of the system by the system owner Unit4.

Miscellaneous Finance	(£94,000)	As detailed in the Treasury Management Report, the Council is no longer expecting to borrow externally this year, so there will be a saving on the costs of borrowing and further, as more CIL money was allocated to the Leisure Centre project at the end of 2019/20 than had been anticipated, the minimum revenue provision for 2020/21 has also been reduced.
Member & Committee Support	(£30,000)	Covid-19 has meant that no Member training sessions were scheduled between April and December causing an underspend in the Member Services budget. Vacancies in Democratic Services have now been filled, however it is anticipated that there will also be a savings on staff costs during the year.
Office Accommodation	£10,000	Under-recovery of rent due to the CAB moving out of 70 Market Street and not being replaced during the current financial year.
Human Resources	(£21,000)	Due to Covid-19 the training budget has underspent this year. There will be underspends on in-house training, training expenses and external training.
Registration of Electors	(16,000)	Due to Covid-19 expenditure on stationery, postage, conferences & canvassers fees have not been spent this year.
Covid-19	£0	It remains extremely difficult to predict the Council's spend in relation to the pandemic and indeed if any further Government funding will become available. However, with the Authority having now received a fourth tranche of un-ringfenced funding, and having the opportunity to recover some of its lost income from the Sales, Fees and Charges Compensation Scheme, there is no reason to assume that the pandemic will result in a net loss to the Council. At this point, it is therefore assumed that spend / reductions in income will match the Government Grant received.

Reprographics	(£10,000)	Savings made in 2020/21 on printing and stationery costs due to the majority of staff working from home.
Government Grants	(£130,000)	The Council has received £130,000 of Government grant as payment for facilitating the payment of grants to local businesses during the initial Covid-19 lockdown.

## Capital

- 3.7 There are five yearend variations forecast at this time. On Operational Services, these relate to the purchase of wheeled bins. It was originally anticipated that the purchase of these would be actioned via East Cambs Street Scene, but as these need to remain as an asset to the Council, it is now felt appropriate that the cost of these is charged to the Council's capital budget. The purchase of new Refuse and Cleansing vehicles has been put on hold to try to ensure that the purchase of these ties in with the new Government Waste Strategy and any potential grant funding that may become available through this, and the depot improvements have been delayed as further costings are being sought.
- 3.8 In relation to Finance and Assets Committee the variations relate to East Cambs Trading Company not planning to drawdown the full value of their new loan facility on the 31<sup>st</sup> March 2021 and with the Covid-19 pandemic, the Council no longer expecting to purchase additional car parking capacity for its commuter car park.

## 4 ARGUMENTS / CONCLUSIONS

- 4.1 The projected net revenue expenditure for the Council is forecast to be £13,345,706 in 2020/21. This gives an underspend of £428,500 compared to the Council's approved budget.
- 4.2 The projected Capital Outturn for the Council stands at £8,715,060. This reflects an underspend of £3,155,950 when compared to the revised budget.

## 5 FINANCIAL IMPLICATIONS/EQUALITY IMPACT ASSESSMENT

- 5.1 There is a revenue underspend of £428,500 forecast for yearend, compared to this Council's approved budget, this will be transferred to the Surplus Savings Reserve at this point, for use in future years. (The MTFs modelling, which is also being presented to this meeting, has been amended to reflect this.)
- 5.2 Equality Impact Assessment (INRA) not required.
- 5.3 Carbon Impact Assessment (CIA) not required.

## 6 APPENDICES

Appendix 1 – Summary Budget Monitoring – December 2020

Appendix 2 – Operational Services Budget Monitoring – December 2020

Appendix 3 – Capital Budget Monitoring – December 2020

Appendix 4 – Reserve usage forecast for 2020/21 as at December 2020

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<u>Background Documents</u>	<u>Location</u>	<u>Contact Officer</u>
Council Budget as approved by Council on the 20 <sup>th</sup> February 2020	Room 104 The Grange Ely	Ian Smith Finance Manager Tel: (01353) 616470 E-mail: <a href="mailto:ian.smith@eastcambs.gov.uk">ian.smith@eastcambs.gov.uk</a>





## OPERATIONAL SERVICES COMMITTEE BUDGET MONITORING REPORT - DECEMBER 2020

	Total Budget 2020-21	Profiled Budget to 31st December 2020	Actual to 30 December 2020	Variance to date	Projected Outturn	Variance between Total Budget & Projected Outturn	Outturn Variance previous Quarter
Revenue	£	£	£	£	£	£	£
Building Regulations	27,520	20,640	15,302	(5,338)	7,520	(20,000)	(10,000)
CIL	(0)	6,000	(3,100,523)	(3,106,523)	-		
Civic Amenities Act	11,428	6,696	6,902	206	11,428		
Community Projects & Grants	221,578	101,118	121,178	20,060	164,578	(57,000)	(47,000)
Community Safety	50,834	26,172	(10,721)	(36,893)	50,834		
Cons.Area & Listed Buildings	60,578	45,434	45,711	277	60,578		
Customer Services	465,859	350,423	324,366	(26,057)	415,859	(50,000)	(25,000)
Dog Warden Scheme	34,512	25,946	20,925	(5,021)	34,512		
Ely Markets	(0)	-	(23,398)	(23,398)	-		
Emergency Planning	28,088	16,593	14,145	(2,448)	28,088		
Environmental Issues	90,260	58,695	55,944	(2,751)	90,260		
Health - Admin. & Misc.	407,059	303,022	293,319	(9,703)	407,059		
Homelessness	372,074	280,555	(425,352)	(705,907)	338,574	(33,500)	(22,500)
IT	801,156	644,392	623,970	(20,422)	801,156		
Licensing	(899)	(674)	(10,243)	(9,569)	(899)		
Marketing & Grants	66,345	50,064	41,417	(8,647)	66,345		
Neighbourhood Panels	1,500	1,125	-	(1,125)	500	(1,000)	
Nuisance Investigation	70,970	53,227	54,661	1,434	70,970		
Performance Management	10,400	7,800	-	(7,800)	10,400		
Pest Control	9,090	6,817	6,401	(416)	9,090		
Planning	(16,131)	(12,071)	49,528	61,599	43,869	60,000	37,000
Public Relations	75,172	56,379	48,804	(7,575)	75,172		
Refuge Recycling	952,785	714,589	719,075	4,486	952,785		
Refuse Collection	1,177,951	883,463	1,006,638	123,175	1,195,951	18,000	18,000
Renovation Grants	-	-	-	-	-		
Street Cleansing	689,469	517,102	517,852	750	689,469		
Street Naming & Numbering	7,896	5,922	2,752	(3,170)	7,896		
Travellers Sites	(20,000)	(33,717)	21,540	55,257	(11,000)	9,000	
Tree Preservation	55,409	32,905	30,525	(2,380)	55,409		
<b>Revenue Total</b>	<b>5,650,903</b>	<b>4,168,617</b>	<b>450,718</b>	<b>(3,717,899)</b>	<b>5,576,403</b>	<b>(74,500)</b>	<b>(49,500)</b>

## CAPITAL BUDGET MONITORING 2020/21

Capital	Published Budget 2020-21 £	Slippage from 2019-20 £	Approved Additions £	Revised Budget 2020-21 £	Actual at 31st December 2020 £	Forecast Outturn £	Variance between Revised Budget & Forecast Outturn £
<b>OPERATIONAL SERVICES</b>							
Conservation Area Schemes - 2nd round		27,506		27,506		27,506	0
Refuse & Cleansing Vehicles	1,882,077			1,882,077		32,077	(1,850,000)
Waste - Wheelied Bins					35,144	40,000	40,000
Depot	745,950	100,000		845,950		0	(845,950)
Mandatory Disabled Facilities Grants	697,299	94,417	81,894	873,610	144,314	873,610	0
Empty Properties, Discretionary DFGs, Minor Works, Home Repair Asst.	75,000			75,000	17,203	75,000	0
Vehicle Etc. Replacements	29,000	89,187		118,187		118,187	0
Leisure Centre				0	(188,038)	0	0
<b>Operational Services Total</b>	<b>3,429,326</b>	<b>311,110</b>	<b>81,894</b>	<b>3,822,330</b>	<b>8,623</b>	<b>1,166,380</b>	<b>(2,655,950)</b>
<b>FINANCE &amp; ASSETS</b>							
East Cambs Trading Company - original		1,980,000		1,980,000	650,000	1,980,000	0
East Cambs Trading Company - MOD		300,000		300,000	300,000	300,000	0
East Cambs Trading Company - New loan facility			4,900,000	4,900,000		4,800,000	(100,000)
Riverside Moorings		289,500		289,500	289,500	289,500	0
Internet / HR / Payroll System		15,980		15,980	1,250	15,980	0
Commuter Car Park - Ely (additional)		400,000		400,000		0	(400,000)
Extension to Ely Country Park	163,200			163,200		163,200	0
<b>Finance &amp; Assets Total</b>	<b>163,200</b>	<b>2,985,480</b>	<b>4,900,000</b>	<b>8,048,680</b>	<b>1,240,750</b>	<b>7,548,680</b>	<b>(500,000)</b>
<b>Total</b>	<b>3,592,526</b>	<b>3,296,590</b>	<b>4,981,894</b>	<b>11,871,010</b>	<b>1,249,373</b>	<b>8,715,060</b>	<b>(3,155,950)</b>

SOURCES OF FINANCING	Published Budget 2020-21 £	Slippage from 2019-20 £	Approved Additions £	Revised Budget 2020-21 £	Variations £	Forecast Outturn £
<b>Operational Services</b>						
Grants / Contributions (DFG)	526,577		81,894	608,471		608,471
Revenue Contribution		89,187		89,187		89,187
Capital Receipts	245,722	94,417		340,139		340,139
Borrowing - Waste	2,628,027	100,000		2,728,027	(3,470,950)	(742,923)
Section 106 / CIL	29,000	27,506		56,506	815,000	871,506
<b>Operational Services Total</b>	<b>3,429,326</b>	<b>311,110</b>	<b>81,894</b>	<b>3,822,330</b>	<b>(2,655,950)</b>	<b>1,166,380</b>
<b>Finance &amp; Assets</b>						
Capital Receipts		305,480		305,480		305,480
Section 106 / CIL	163,200	400,000		563,200	(400,000)	163,200
Borrowing - Company	0	2,280,000	4,900,000	7,180,000	(100,000)	7,080,000
<b>Finance &amp; Assets Total</b>	<b>163,200</b>	<b>2,985,480</b>	<b>4,900,000</b>	<b>8,048,680</b>	<b>(500,000)</b>	<b>7,548,680</b>
<b>Capital Funding Total</b>	<b>3,592,526</b>	<b>3,296,590</b>	<b>4,981,894</b>	<b>11,871,010</b>	<b>(3,155,950)</b>	<b>8,715,060</b>

Capital Resources Forecast	Published Budget 2020-21 £	Slippage from 2019-20 £	Approved Additions £	Revised Budget 2020-21 £	Variations £	Forecast Outturn £
Balance Brought Forward	463,173	921,751		1,384,924		1,384,924
Add receipts from Sales of Assets	2,273,500			2,273,500	2,173,500	100,000
Less Capital Receipts Applied	(245,722)	(399,897)		(645,619)		(645,619)
<b>Capital Reserves Carried Forward</b>	<b>2,490,951</b>	<b>521,854</b>	<b>0</b>	<b>3,012,805</b>	<b>2,173,500</b>	<b>839,305</b>

Borrowing	Published Budget 2020-21 £	Slippage from 2019-20 £	Approved Additions £	Revised Budget 2020-21 £	Variations £	Forecast Outturn £
Balance Brought Forward	13,145,749	(1,384,891)		11,760,858		11,760,858
Less MRP Applied	(499,058)			(499,058)	79,126	(419,932)
Repayment from ECTC	(3,620,000)	(2,880,000)		(6,500,000)	0	(6,500,000)
Add additional Borrowing Applied	2,628,027	2,380,000	4,900,000	9,908,027	(3,570,950)	6,337,077
<b>Borrowing Carried Forward</b>	<b>11,654,718</b>	<b>(1,884,891)</b>	<b>4,900,000</b>	<b>14,669,827</b>	<b>(3,491,824)</b>	<b>11,178,003</b>

## Reserve Accounts

Description	2020/21			
	Opening Balance 1 April	Transfers to Reserve	Contributions from Reserve	Forecast Balance 31 March
	£	£	£	£
District Elections	0	22,500		22,500
Historic Buildings Grants	6,190			6,190
Housing Conditions Survey	40,000	5,000		45,000
Building Control	23,155			23,155
Change Management	236,744	12,479		249,223
Major Project Development	100,000			100,000
Asset Management	0			0
Surplus Savings Reserve	7,017,799	473,185	(1,391,541)	6,099,443
Vehicle Replacements	89,187			89,187
New Homes Bonus	44,685		(44,685)	0
Leisure Centre - sinking fund	(44,685)	44,685		(0)
Insurance	16,343			16,343
IT	40,000	40,000		80,000
CIL	3,219,091	3,800,000	(2,735,000)	4,284,091
CIL Admin	226,560	190,000	(100,000)	316,560
Care and Repair	45,000			45,000
Wheeled Bins Reserve	0			0
Community Fund Reserves	14,884			14,884
Housing	79,547			79,547
Affordable Housing	346,150	66,360		412,510
General Fund Balance	1,045,629			1,045,629
Commercial Invest to Save	20,000			20,000
CLT Grant Applications	20,000			20,000
Travellers' Sites	4,357	27,634		31,991
Enterprise Zone NNDR	253,577	154,761	(46,428)	361,910
Economic Development	0			0
Other				
Section 106 Agreements	2,267,451		(500,000)	1,767,451
Internal Borrowing	(11,760,859)	6,919,933	(6,337,077)	(11,178,003)
<b>Total Reserves</b>	<b>3,350,806</b>	<b>11,756,537</b>	<b>(11,154,731)</b>	<b>3,952,612</b>

**BRECKLAND COUNCIL**  
**EAST CAMBRIDGESHIRE DISTRICT COUNCIL**  
**EAST SUFFOLK DISTRICT COUNCIL**  
**FENLAND DISTRICT COUNCIL**  
**WEST SUFFOLK DISTRICT COUNCIL**

**At a Meeting of the**

**ANGLIA REVENUES AND BENEFITS PARTNERSHIP JOINT COMMITTEE**

**Held on Tuesday, 8 December 2020 at 11.00 am**  
**Virtual Meeting via Zoom**

**PRESENT**

Mr J.P. Cowen (Chairman)	Mr M. Cook
Mr D Ambrose Smith (Vice-Chairman)	Mrs J. French
Mrs S. Broughton	

**In Attendance**

Jo Andrews	- Strategic Manager (Revenues)
Sam Anthony	- Head of HR & OD
Alison Chubbock	- Chief Accountant (Deputy Section 151 Officer) (BDC)
Paul Corney	- Head of ARP
Brian Mew	- Chief Finance Officer & S151 Officer
Adrian Mills	- Strategic Manager (Billing & Benefits) ARP
Stuart Philpot	- Strategic Manager (Support Services) ARP
Ian Smith	- Finance Manager & S151 Officer (East Cambs)
Greg Stevenson	- Service Manager (Finance & Performance)
Teresa Smith	- Democratic Services Team Leader
Julie Britton	- Democratic Services Officer

**62/20 MINUTES (AGENDA ITEM 1)**

The Minutes of the meeting held on 15 September 2020 were agreed as a correct record subject to the title of Councillor Kim French (substitute Member) being changed to Miss under those recorded as present.

**63/20 APOLOGIES (AGENDA ITEM 2)**

Apologies for absence were received from Peter Catchpole, Corporate Director and Chief Finance Officer (S151) for Fenland District Council and Rachael Mann, Assistant Director (Resources & Performance) for West Suffolk District Council.

Sam Anthony, Head of HR & OD for Fenland DC and Greg Stevenson, Service Manager (Finance & Performance) for West Suffolk DC were in attendance as their substitutes.

**64/20 URGENT BUSINESS (AGENDA ITEM 3)**

None.

**65/20 DECLARATIONS (AGENDA ITEM 4)**

None declared.

**Action By**

**66/20 PERFORMANCE AND SERVICE UPDATES (STANDING ITEM) (AGENDA ITEM 5)**

Stuart Philpot, the Strategic Manager (Support Services) ARP presented the performance and service update report and highlighted the following areas:

Council Tax Collection

The Council Tax collection rates for all partners had reduced due to the pandemic.

Two rounds of 'soft reminders' had been sent out to customers which had had a positive effect on collections.

In October 2020, statutory reminders had been issued. Magistrate Courts had re-opened and would be in session during December and as such Court Hearings had been booked for all authorities.

Fraud and Compliance

£1.5m of fraud had been identified with the majority being due to single persons discounts non-compliance.

Business Rates Collection

All revised targets had been achieved with the exception of East Suffolk showing a £1.7m collection target shortfall. However, since the publication of the report, East Suffolk had collected a further £1.2m reducing the shortfall to £500k under collection target.

For Fenland DC refunds were still outstanding in respect of the NHS Trusts pending appeals.

The Fraud Team had assisted and had been involved with checking the due diligence in respect of the Covid-19 grants for NNDR.

Enforcement

All enforcement visits had been suspended from March to August 2020 due to the pandemic and although the collection rates had since risen, with face-to-face visits now resumed, they were not back to the levels that had been collected the previous year. The Enforcement Team were taking all the necessary precautions in respect of PPE and risk assessments.

ARP Systems and Digital

There had been a significant increase in activity on the ARP website due to the offices being closed for face-to-face visits – up to 60% compared to 2019.

A more collaborative relationship with Capita had been demonstrated recently with the implementation of Total Mobile Software to aid the visiting officers in their work.

Members were then invited to ask questions.

**Action By**

Referring to fraud and compliance, Councillor French felt that the amount of fraud was quite concerning in respect of single persons discounts and asked how ARP was notified of such fraudulent activities.

In response, Members were informed that such information was captured through the Norfolk Fraud Information hub and through random checks that were carried out, but it could also be captured from notifications from neighbours, friends and even family.

Councillor French assumed that such claimants would have other people living with them and asked how many days a person was allowed to reside at the same property before the single persons discount was removed.

Adrian Mills, the Strategic Manager (Billing & Benefits) ARP explained that a person had to live at the property for a substantial part of the week, any less would be classed as casual. There were checks and balances in place to eliminate such fraudulent activities.

The Vice-Chairman, Councillor Ambrose-Smith referred to benefits and the Government funding of £500 that had been awarded to claimants who had to self-isolate. Within the report he had noted that the demand would outstrip the funding and asked what would happen with this going forward.

The Strategic Manager (Billing & Benefits) ARP advised that the Test & Trace Self Isolation £500 payments were currently scheduled to continue until 31 January 2021; however, the Government was considering an extension to these grants until the end of March 2021. Furthermore, additional programme funding and discretionary funding to meet demand was also being considered as well as the administrative burden on local authorities in terms of coping and distributing this additional funding. Conversations were still on-going. The current demand for the Partnership areas had been at the level forecasted by the Government unlike other parts of the country where such funding had already been outstripped. It was noted that the funding was monitored weekly with the S151 Officers within the Partnership.

The Chairman was pleased that the automated services were increasing year on year.

The report was otherwise noted.

**67/20 ARP FINANCIAL PERFORMANCE 2020-21 (AGENDA ITEM 6)**

Alison Chubbock, the Chief Accountant & Deputy S151 Officer (BDC) presented the report that provided Members with a full year financial forecast against the budget.

The report had been based on information as of 31 October 2020 and showed an overspend against budget of £522k for the whole of the Partnership. This was mainly due to lost enforcement income that had been seriously affected by impact of the Covid pandemic. However, the forecast had slightly improved since the previous meeting and was moving in the right direction.

Members attention was drawn to the table on page 40 of the agenda pack. Members were assured that although the overspend was quite significant, the majority of that would be compensated from grants that the Government was

**Action By**

providing to individual authorities to offset the losses from sales fees and charges income.

The appendices on pages 42 and 43 provided further detail on the main variances.

The Chairman and the Vice-Chairman thanked the Chief Accountant for such a detailed report.

The report and appendix were otherwise noted.

**68/20 ARP JOINT COMMITTEE PARTNERSHIP BUDGET (AGENDA ITEM 7)**

The Chief Accountant & Deputy S151 Officer (BDC) presented the proposed budget for the whole of the Partnership for the next financial year, 2021-22. The report also included indicative future years allocations and highlighted the individual Partners' shares towards the costs.

The budget for next year was £151k lower than 2020-21, mainly due to additional income in respect of parking enforcement work – the detail behind this figure had been highlighted at paragraph 1.5 of the report.

Future budgets from 2022-23 included other efficiency targets to be achieved of £220k.

The recent spending review announced a public sector pay freeze just prior to the publication of the report. Consequently, this budget paper did not include any reduction from this potential change but with many of the Partners' on local pay schemes this would not be reflected in every single Partners' budget. It was likely that there could be a saving of approximately £40k from that pay freeze due to all Partners' making their own decisions; therefore, for next year, a small variance would be shown if that pay freeze came to fruition.

Although the enforcement income continued to be a risk, all services were continuing as normal and the budget had been based on those services as expected.

The Vice-Chairman referred to section 1.4 of the report where it mentioned new parking enforcement work would commence in 2020-21. He asked if this could be explained as he was not aware of this new service. Jo Andrews, the Strategic Manager (Revenues) ARP explained that ARP would be taking on this enforcement work in respect of parking fines for East & West Suffolk Councils. This would operate in the exact same way as council tax and business rates enforcement and an increase in fee collections and income was expected.

The Vice-Chairman also asked a question in respect of no changes being made to the budget setting going forward. The Chief Accountant (BDC) explained that this year had been used as a basis taking account of ARP's performance and continued delivery of services and was comfortable with the proposed budget going forward in such uncertain times.

Having seen the way that the ARP had delivered services during such difficult times, the Chairman felt that the Chief Accountant's assessment of this budget was correct.

**Action By**

Councillor French had been very interested to hear about the new parking enforcement service. As the Portfolio Holder for Fenland DC, she had been looking into this matter and various meetings had been held and a draft report was being prepared hopefully prior to Christmas. One of the issues discussed during these meetings was how fines that had not been paid were collected and she would be very interested to have further conversations with ARP in respect of this work.

The Chairman felt that there had been much discussion at previous meetings on lessons learnt and transferring skills sets within the Partnership and this new enforcement work could clearly benefit Fenland DC. He was sure that the Strategic Manager (Revenues) ARP would be happy to assist Fenland in any way that she could.

Members were informed that Suffolk County Council delegated authority to East & West Suffolk District Councils who had their own in-house teams to manage such work. Enforcement matters then came to the ARP's Enforcement Team which all Partners would benefit from.

Paul Corney, the Head of ARP suggested that Sam Anthony, the Head of HR & Organisational Development for Fenland District Council speak to the other OIB Members from East & West Suffolk to understand exactly what process they followed that could be of some assistance.

In response, the Head of HR & Organisational Development said that she would be happy to follow that up with OIB Members.

The Chairman thanked the Chief Accountant (BDC) for an excellent report.

**RESOLVED** that the Partnership budget at Appendix A of the report for 2021-22 be approved.

**69/20 ANGLIA REVENUES PARTNERSHIP SERVICE DELIVERY PLAN AND RISK REGISTER (AGENDA ITEM 8)**

The Head of ARP presented the Service Delivery Plan that should be agreed by the ARP Joint Committee by the end of December each year and the Risk Register report that had to be reviewed every six months.

Details of the 2019/20 Service Delivery Plan at section 2.1 of the report were highlighted. The Head of ARP felt this was good news, even with the pressures of Covid, ARP had been able to continue its work with the Fraud Team and Recovery Team jointly funded by County Councils and the results of this work had been surprisingly favourable. A number of objectives had been achieved and the Digital workstream had progressed which had released resources for those who could not self-serve.

The priorities of the Revenues and Benefits service were highlighted including the introduction of "Colleagues" which was linked to building talent within the organisation and ending up with an excellent workforce to be able to carry on the good work and succession planning when certain Officers reached retirement age or left the organisation.

The Chairman felt that the last point made in respect of succession planning was appropriate going forward and congratulated all Officers involved for all their hard work and for making the Members' role a great deal easier.



**RESOLVED** that:

- the progress in respect of the December 2019 Service Delivery plan be noted; and
- the revised Service Delivery Plan and Risk Register at Appendix B of the report be approved.

**70/20 WELFARE REFORM UPDATE (STANDING ITEM) (AGENDA ITEM 9)**

Adrian Mills, the Strategic Manager (Billing & Benefits) ARP presented the report.

Members' attention was drawn to paragraph 2.2.3 in respect of Universal Credit.

Members had taken an interest previously in DWP's contract with Citizen's Advice to help provide help to claim Universal Credit service in the current year. DWP had originally stated that a review of this contract would be forthcoming; however, as yet this had still not been completed due to the Covid pandemic and following a number of meetings no further updates had been provided.

Any information received would be shared with OIB Members followed by ARP Joint Committee Members.

It was noted that DWP had stopped the Harrogate managed migration pilot again due to Covid-19 and such plans were still on hold. However, cases where a claimants' circumstances had changed were now being accelerated from Housing Benefit to Universal Credit accordingly – this method was more challenging for customers and administratively more complex for DWP and local authorities.

As far as the spending review was concerned in terms of Universal Credit, Members were aware, as part of the DWP Covid response, had increased Universal Credit rate by £20 per week. However, the spending review had not stated whether this would be continued into the forthcoming financial year although it had been announced by the Secretary of State that it would be reviewed in time for April 2021.

Attention was then drawn to paragraph 2.3, Discretionary Housing Payment.

DWP had increased funding to offset the impact of private sector rents for this year which had been very helpful. Spend continued to be within DWP grant, and all the grant monies would be used to help customers. The main area of expenditure continued to be to assist customers with rent shortfalls, due to restrictions on Housing Benefit rent levels.

Under paragraph 2.4.3 in respect of the Benefit Cap, DWP had provided New Burdens funding to assist Councils with extra administrative costs and had increased Discretionary Housing Payment grants to help customers with the reduction in benefits that had been reduced by £6k based on the maximum family income.

Under section 3 of the report, Government had confirmed an end to the four-

**Action By**

year Benefit uprating freeze from April 2020. Spending Review had announced that state pensions would increase by 2.5% protected by the triple lock, whilst benefits would increase by the September 2020 inflation rate of 0.5%.

The report was otherwise noted.

**71/20 FORTHCOMING ISSUES (STANDING ITEM) (AGENDA ITEM 10)**

In a response to a concern in respect of why Breckland Council was taking over the HR services in-house, away from West Suffolk Council without ARP JC Members being informed, the Head of ARP explained the reason that Members had not been made aware was due to the arrangement being between Breckland Council and West Suffolk Council in the form of a Service Level Agreement.

It was agreed that the Operational Improvement Board should discuss the new arrangement.

**72/20 NEXT MEETING (AGENDA ITEM 11)**

Due to other commitments, it was agreed that the date of the next would be changed to either the week before or the week after 16 March 2021.

The new date would be confirmed in due course, all Members were content with it being brought forward to Tuesday, 9 March 2021 if suitable for Officers.

The Chairman took the opportunity to wish everyone a very Happy Christmas.

The meeting closed at 11.45 am

CHAIRMAN

**FINANCE & ASSETS COMMITTEE**  
**ANNUAL AGENDA PLAN**

**AGENDA ITEM NO 16**

**LEAD OFFICER(S): Emma Grima, Director Commercial**

**DEMOCRATIC SERVICES OFFICER:**

Meeting on: Monday 25 January 2021 4.30pm			Meeting on: Monday 1 or Thursday 4 March 2021 4.30pm			Meeting on: Thursday, 25 <sup>th</sup> March 2021 4.30pm		
Agenda Planning meeting:			Agenda Planning meeting:			Agenda Planning meeting:		
Pre-meeting briefing:			Pre-meeting briefing:			Pre-meeting briefing:		
Deadline for reports/dispatch:	4pm Wednesday 13 January 2021	Friday 15 January 2021	Deadline for reports/dispatch:			Deadline for reports/dispatch:	Monday 15 March 2021	Wednesday 17 March 2021
<ul style="list-style-type: none"> <li>Chairman's Announcements</li> <li>2021/22 Annual Treasury Mngt Strategy MRP &amp; AIS</li> <li>External Audit - Annual Audit Letter</li> <li>Revenue Budget 2021-22</li> <li>On-Street Parking Enforcement</li> <li>Equalities Policy</li> <li>Finance Report</li> <li>Covid 19 WP Notes</li> <li>ARP Minutes – 8/12/20</li> <li><i>Actions taken by the Chief Executive on the Grounds of Urgency (if any)</i></li> <li><i>Write Off of Unrecoverable Debt (if any)</i></li> <li>CIL/S106 Income and Expenditure Update</li> </ul>	Finance Manager & S151 Officer External Audit  Finance Manager & S151 Officer Dir Operations HR Manager Finance Manager & S151 Officer DSO Dir Commercial  DSO  Finance Manager & S151 Officer Dir Commercial		<ul style="list-style-type: none"> <li>Chairman's Announcements</li> <li>ECTC Business Plan 2021/22</li> <li>Bus, Cycle, Walk WP Notes</li> <li>Assets Update</li> <li>Contract Procedures</li> <li>East Cambs CLT</li> <li><i>Actions taken by the Chief Executive on the Grounds of Urgency (if any)</i></li> <li><i>Write Off of Unrecoverable Debt (if any)</i></li> <li>Forward Agenda Plan</li> <li>ECTC Management Accounts [EXEMPT]</li> <li><i>Asset Management Matter [EXEMPT]</i></li> </ul>	Dir Commercial  DSO  Open Spaces & Facilities Manager  Dir Commercial Dir Commercial DSO  Finance Manager & S151 Officer  DSO ECTC Finance Manager Dir Commercial	<ul style="list-style-type: none"> <li>Chairman's Announcements</li> <li>External Audit - Audit Plan 2021/22</li> <li>Internal Audit Charter &amp; Work Plan 2021/22</li> <li><i>Action taken by the Chief Executive on the Grounds of Urgency (if any)</i></li> <li><i>Write Off of Unrecoverable Debt (if any)</i></li> <li>Assets Update</li> <li>ARP Minutes – 09/03/21</li> <li>Forward Agenda Plan</li> <li>ECTC Management Accounts [EXEMPT]</li> <li><i>Appointments, Transfers, Resignations [EXEMPT]</i></li> </ul>	External Audit  Internal Audit  DSO  <i>Finance Manager &amp; S151 Officer</i> Open Spaces & Facilities Manager  Dir Commercial DSO ECTC Finance Manager  HR Manager		

[Notes: 1. Agenda items which are likely to be “urgent” and therefore not subject to call-in are marked \*  
2. Agenda items in italics are provisional items/possible items for future meetings]

**FINANCE & ASSETS COMMITTEE**  
**ANNUAL AGENDA PLAN**

**LEAD OFFICER(S): Emma Grima, Director Commercial**

**DEMOCRATIC SERVICES OFFICER:**

Monday 25 January 2021 4.30pm [continued]		Meeting on:	Monday 1 or Thursday 4 March 2021 4.30pm [continued]	Meeting on:	Thursday, 25 March 2021 4.30pm [continued]	
Agenda Planning meeting:		Agenda Planning meeting:		Agenda Planning meeting:		
Pre-meeting briefing:		Pre-meeting briefing:		Pre-meeting briefing:		
Deadline for reports/dispatch:	4pm Wednesday 13 January 2021	Friday 15 January 2021	Deadline for reports/dispatch:		Deadline for reports/dispatch:	Monday 15 March 2021 Wednesday 17 March 2021
<ul style="list-style-type: none"> <li>Climate Change SPD</li> <li>Impacts of Covid-19 on ECDC BAME Population</li> <li>Forward Agenda Plan</li> <li>Appointments, Transfers, Resignations [EXEMPT]</li> </ul>	Strat Planning Mnger Lewis Bage  DSO  HR Manager					

[Notes: 1. Agenda items which are likely to be “urgent” and therefore not subject to call-in are marked \*  
 2. Agenda items in italics are provisional items/possible items for future meetings]