

From: Cllr Anna Bailey
Sent: 14 February 2025 11:18
To: charlotte.cane.mp@parliament.uk
Subject: FW: Supporting the continuation of home-to-school transport for SEND children from April 2025 - respectful request for your urgent assistance

Hi Charlotte

Please see below. Have you already been contacted by others about this, and are you able to help?

Kind regards

Anna

Anna Bailey

East Cambs District Council

Member for the Downham Ward

Leader of the Council

Phone: [REDACTED]

Mobile: [REDACTED]

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From: [REDACTED]

Sent: 06 February 2025 12:22

To: Cllr Anna Bailey

Subject: Supporting the continuation of home-to-school transport for SEND children from April 2025 - respectful request for your urgent assistance

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Cllr Bailey,

I am writing to you in my capacity as Chair of the Licensed Private Hire Car Association's SEND Transport Operators' Group and your own as the Leader of East Cambridgeshire District Council respectfully to request your urgent assistance.

Although I appreciate that the organisation you lead is not a local education authority I wanted to draw your attention to the impact the provisions within the National Insurance (Secondary Class 1 Contributions) Bill will have on the costs - increasing them substantially - of those private suppliers providing home-to-school transport to children with special educational needs in your area.

It is not yet clear how suppliers - like those in membership of the LPHCA SENDTO Group - will be able to continue providing transport services for this vulnerable group from April if the associated contracts are now set to run at a loss. If these contracts have to be relinquished then local education authorities risk falling foul of their statutory duties around providing this type of transport to qualifying children.

In order to avoid this outcome, we believe that the provision of an emergency grant for fiscal year 2025/26 will be required to address immediate and unplanned-for shortfalls in the finances of affected local authorities from April such that it covers all outsourced SEND transport provision until the following March.

The LPHCA SENDTO Group has calculated that a ring-fenced SEND transport grant to local authorities for 2025/26 of £40m should be enough to cover the shortfall in England, Wales and Northern Ireland for the next twelve months. We consider this to be a modest amount, particularly when set against the huge upset it will cause to some of the most vulnerable in our society and the massive disruption it will impose on the lives of their parents.

Although the Government has suggested that the £515m it announced in December to offset the rise in National Insurance contributions amongst local authorities' own employees would address the issue, it will not - as you will appreciate - be enough to offset the indirect costs from council services delivered by private providers, such as the suppliers the LPHCA SENDTO Group represents.

My ask of you is therefore please to raise the issue with those Members of Parliament who represent the same constituency of people you do so as to ensure that Central Government is aware of the damaging impact the upcoming increase in National Insurance contributions will have on SEND transport provision in the absence of local education authorities being granted emergency funding of the type described above.

I hope that you may be able to provide the urgent assistance requested here before the increase in National Insurance contributions comes into force in less than two months' time. Needless to say, myself and colleagues within our membership are at your disposal should you wish to be briefed in-person or online about this issue by us. Please also find attached a short briefing

which provides some additional detail.

Yours sincerely,

[REDACTED]

Chair, Licensed Private Hire Car Association SENDTO Group

[REDACTED] [@sendto.org.uk](mailto:[REDACTED]@sendto.org.uk)



Children With Special Educational Needs Transport Issue

Briefing Document (February 2025)

Background:

On the 30th October 2024, the Chancellor of the Exchequer, the Right Honourable Rachel Reeves MP, presented her autumn budget to Parliament. Within that budget were several tax revenue raising measures due to commence in April 2025. Specifically, with regards to Employer National Insurance contributions, there was a lowering of the threshold at which employers start paying National Insurance on each employee's salary from £9,100 per year to £5,000. In addition there was an increase in the contribution level employers pay from 13.8% to 15%.

The changes in tax legislation regarding Employer National Insurance contributions have serious and significant implications for the whole industry involved in providing Special Needs school transport service. Many services providers, who focus on service quality and staff training, tend to employ both passenger assistants and drivers directly. It is typical for passenger assistants and drivers to be working about three and a half hours per day. Therefore, from April 2025 their employment will now meet the new reduced threshold, and the increased rate of employer national insurance will also apply.

Impact to the Transport Providers:

We estimate the Special Educational Needs School Transport industry to be worth about £1.3 billion per year in the UK and it employs approximately 100,000 people.

For those companies that provide daily transport services to school children with special educational needs across the country, these new measures from the Exchequer mean they are facing an unprecedented increase in their employment costs. As such, many of the routes that form part of the services they provide to local authorities will no longer be commercially viable.

We estimate the number of children in scope for these services in the UK to be approximately 200,000, and the majority have a form of autism. These children are some of the most vulnerable people in our society today. For many, consistency of environment is a critical element in helping them achieve their life skills and academic potential. The specialist staff and vehicles our industry provides cater for a hugely complex variety of medical and sensory needs. Providing consistency in staff, vehicles, routes, and arrival/departure locations, is essential to minimising the trauma many children suffer if routines are disturbed. In addition, interference to these services will result in significant disruption to the work and home lives of the parents and carers, and further workload for the school staff too.

Our industry is committed to the successful provision of these specialist services, and as such we provide stability and certainty for all those involved, the local authorities, the parents, carers, and pupils, the schools and colleges, and of course our drivers and passenger assistants.

However, with such a financial impact coming in April 2025, many of the contracts with local authorities up and down the country will no longer be commercially viable. Many contracts will be handed back to the Local Authorities therefore resulting in a significant numbers of the 100,000 employees being put at risk of redundancy.

Impact to the Local Authorities

Local Authorities have a statutory obligation to provide special educational needs transport services.

The procurement process is complex and resource consuming. The focus on safety, service quality, and service continuity required, is paramount when it comes to selecting a provider.

When the service providers terminate their now loss making contracts, the Local Authorities will have to re-tender thousands of contracts, with all the service, contract, and financial disruption this would entail, as well as the additional workload that would impact the schools, colleges, and social care sector.

During this disruption, there is a clear risk that there will be a delay to the local authorities being able to procure replacement contracts in time. Therefore, there is a risk that many vulnerable children will simply have no ability to get to school.

Impact to the Children

The children impacted here are some of the most vulnerable children in our society today. For many, this is not just about facilitating them achieving the highest level of education attainment they can, rather specialist schools and teaching staff ensure they learn some of the basic life-skills they need to give the children a level of independence and quality of life when they reach adulthood.

Consistency of a high quality service is critical for many special needs children. The slightest change to their routine, such as a taking a new route to school, can trigger anxiety or behavioural issues.

Impact to the Parents/Carers

The schools provide a respite to parents and carers, as many of the children will need 24x7 care and supervision. Parents and carers may not be able to work and earn a living if their children are either: not able to attend school due to service interruption; or display behavioural issues as a result of a change to their routine.

Impact to the Schools

School staff may well have to deal with additional behavioural issues triggered by changes to the specific routines of the children.

School staff are often ready and waiting for individual children at certain drop-off bays. The school campuses can be complex too and routes in and out are defined for drivers. The current providers' staff know such specific details of their assigned routes and have personal contact with the teaching staff to avoid issues.

Impact to the Exchequer (and other government departments)

Many Local Authorities are currently cash strapped. They will have to cover the cost of re-tendering and will end up paying more for the transport services they procure. Then, in-turn, the Local Authorities will have to go to central government requesting additional funding to cover their legal obligations to provide these services. As such, the public purse will not benefit from the additional tax raised from the hike in National Insurance imposed on our industry due to the threshold being lowered, it will just end up giving out what it collects.

Due to the nature of the work being a few hours a day during school term-time it suits those people over 50, who may otherwise be retired (already the largest category for unemployment in the UK), or trying to get back to work. As such, it is quite possible that many of the 100,000 drivers and passenger assistants who would be put at risk may become economically inactive as a result of these changes. Therefore adding to this well publicised burden on our economic performance that our country is currently experiencing.

There will be knock on effects to other government services as well. For example Social Care transport.

Specifically with regards to the Disclosure and Barring Service, the additional processing of many tens of thousands of DBS checks that would be needed to support the replacement contracts, would add considerable and unforeseen workload and therefore cost to the relevant departments.

Our Proposed Solution

We understand that there are potential compensation payments being considered specifically for those in the public sector to negate the impact of the employer National Insurance increases. We are requesting that drivers and passengers assistants, that are solely employed on these contracts, who provide essential transport services to some of the most vulnerable people in our society, be considered for inclusion in these compensation payments. Therefore this would be in-line with staff, who are directly employed by the local authorities to provide school transport, as they are covered by the proposed compensation scheme. (It is worth noting that Taxi and Private Hire drivers that are self-employed will not be caught by the employers NIC threshold being lowered, therefore the compensation scheme for those drivers will not be applicable or necessary).

We believe therefore, that extending the compensation scheme to special educational needs transport makes economic sense as it will:

- Maintain the consistency and quality of service provided by our industry today to some of the most vulnerable people in our society.
- The estimated compensation is 40m, negated by businesses not needing to increase prices by 40m, councils not going through a costly retendering process and no loss of education for SEND children or employment for parent/carers.
- Have no impact on the public purse.
- Save the excessive administrative burden and cost to local authorities and schools.
- Provide the reassurance parents and carers need that the children, as well as themselves, will not be adversely impacted by the government's budgetary measures.
- Ensure the job security and continued economic participation of approximately 100,000 specifically trained staff in the over 50s demographic.

From: [REDACTED]@eastcambs.gov.uk>

Sent: 08 July 2025 10:42

To: angela.rayner.mp@parliament.uk; ed.miliband.mp@parliament.uk;

[REDACTED]
[REDACTED]

charlotte.cane.mp@parliament.uk

Cc: Cllr Anna Bailey <Anna.Bailey@eastcambs.gov.uk>

Subject: Letter to Ministers - Sunnica

Good morning all

Please see attached letter regarding the above.

With kind regards.

[REDACTED]

PA to Leader

Sent on behalf of Cllr Anna Bailey, Leader, East Cambridgeshire District Council



East Cambridgeshire District Council

TO: The Rt Hon Angela Rayner
SoS for MHCLG
The Rt Hon Ed Miliband
SoS for Energy Security and Net Zero
The Rt Hon Sir Stephen Timms MP
SoS for DWP
The Rt Hon Steve Reed
SoS for DEFRA

This matter is being dealt with by:

Cllr Anna Bailey

Telephone: (01353) 665555

E-mail: anna.bailey@eastcambs.gov.uk

My Ref: IE/MinSun

Your ref

BY EMAIL

8 July 2025

Dear Secretary of State

Subject: Urgent request for guidance on Control of Major Accident Hazard and Hazardous Substances Consent in relation to Battery Energy Storage Systems

As the government builds toward delivering 23-27GW of battery energy storage systems (BESS) by 2030, and with the publishing of both the UK Infrastructure 10 Year Strategy and policy paper on the UK's Modern Industrial Strategy, it is clear that BESS is part of the UK's future to enable energy security and support growth.

The East Cambridgeshire district specifically has and continues to see a growing proliferation of battery and solar developments. . This has in turn attracted Nationally Significant Infrastructure Projects (NSIPs), including most recently the Sunnica Development Consent Order (DCO), which are not determined at the local level.

There remains a significant level of concern and dissatisfaction around the recent handling of the Sunnica DCO, namely that the government's approach has left critical procedural, regulatory and safety concerns unanswered specifically around the discharge of conditions relating to BESS and Hazardous Substance Consent. The Council and its communities are now being asked to both accept and are forced to grapple with the complex nature of discharging these consents in the absence of a robust regulatory framework.

This absence of guidance not only undermines confidence in the planning process at all levels but places an undue burden on the communities who rightly expect rigorous safeguards and transparency when it comes to developments of this nature and scale.

With the Kingsway NSIP also making its way through the pre-application stages, there are concerns these issues will simply be perpetuated and potentially amplified with increasingly larger solar and battery developments. The suggested overhaul of



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the NSIP process also proposes to remove a level of consultation, taking these nationally significant decisions even further away from the communities they affect¹.

This Council therefore considers that, at the very least, it is incumbent upon government to ensure that the regulatory framework around these installations is clear, consistent and sound for all those engaging with them, and on this basis **urgently requests guidance on the existing and proposed regulatory landscape surrounding BESS.**

Regulatory Uncertainty

Whilst BESS projects now fall to be determined under the local planning regime as part of The Town and Country Planning Act 1990, rather than the Nationally Significant Infrastructure Project (NSIP) regime, the interactions of BESS sites with Control of Major Accident Hazard (COMAH) Regulations and Hazardous Substances Consent (HSC) obligations remains unclear. This is particularly in relation to Development Consent Order (DCO) 'requirement' discharges as part of NSIPs, and the obligations on this Council as the 'hazardous substances consent' authority.

The matter of hazardous substance consent specifically was raised by this Council's Barrister extensively at the examination in public for the Sunnica DCO. The Examining Authority concluded at the close of examination that BESS safety and the requirement for HSC were the main outstanding issues. The need for HSC subsequently remained unanswered at the point of the DCO being allowed².

As one of the largest solar developments of its kind in the UK, Sunnica should have warranted a fresh look at how these types of nationally significant infrastructure projects are assessed and regulated. Renewable technology is rapidly changing year on year, especially surrounding batteries. The failure to include HSC provisions within or alongside previous DCOs and battery sites cannot be used to perpetuate this position going forward.

As a result of the Sunnica DCO, this Council and the communities affected are therefore left only to hope that the Developer investigates the requirements for HSC independently, a position Sunnica representatives themselves admitted they were uncertain on during the examination. However, as the government's position and guidance on HSC for BESS installations is severely lacking, the real-world implications of this are that many BESS sites are operating without HSC, whether legally required or not.

To clarify the above matter, a research briefing published on the 23rd June 2025³ provides an overview of the current regulatory landscape for BESS, highlighting through both the content and language of the paper that this landscape is opaque.

¹ [Factsheet: Critical infrastructure reforms - GOV.UK](#)

² [Sunnica Decision Letter - 12 July 2024](#)

³ [Battery energy storage systems \(BESS\) - House of Commons Library](#)



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The briefing makes clear that no central guidance exists on the regulatory treatment of BESS. This is despite the guidance issued in April 2024⁴ by the Department for Energy Security and Net Zero (DESNZ) and Health and Safety Executive's (HSE) guidance⁵ which acknowledges that BESS sites can hold dangerous substances. This guidance fails to touch on COMAH and HSC.

For several years, there have also been calls⁶ to bring BESS sites into the COMAH and HSC regimes, but the status and traction of these debates is unclear.

Government's Position on COMAH and BESS

The Government's position on the current relationship between BESS and COMAH Regulations is set out within the June 2025 research briefing, namely that BESS is not considered to fall within the COMAH regime. Whilst this response is noted, no clarification around the need for hazardous substances consent (HSC) is provided. This position on COMAH is also not set out in official guidance.

COMAH Regulations cover the operational safety aspects of a project, whereas HSC provides for the land-use planning aspects of a project. Whilst the two are interlinked and derive from the Seveso III directive, they also exist separately with distinct consenting procedures. The absence of clarification specifically around the interaction between HSC and BESS is therefore problematic.

Impacts of Regulatory Uncertainty

As the 'hazardous substances authority', this Council is in a position whereby it has to assess and determine any hazardous substances consent application.

The failure to obtain HSC is a criminal offence under the Planning (Hazardous Substances) Act 1990. As the 'hazardous substances authority' it is the responsibility of this Council to decide on a course of action if it believes a site to be operating without the necessary HSC. This includes the possibility of serving a contravention notice, or more severely seeking a court injunction.

The void of information around the siting of BESS within the HSC regime therefore places this Council, and many other councils in an impossible position, whereby it cannot fulfil its statutory function as the hazardous substance authority in ensuring sites are operating safely.

The absence of clear central guidance on BESS, and specifically the interactions with HSC, further risks this Council being unable to process BESS applications as well as DCO discharge of requirements (where they pertain to BESS) positively, proactively and efficiently with the interests of its local communities at the centre of this decision-making. It does not enable this Council to make sound and informed decisions, and risks safety and environmental hazards going unmanaged. It also

⁴ [Health and safety in grid scale electrical energy storage systems \(Accessible Webpage\) - GOV.UK](#)

⁵ [Grid-scale battery energy storage systems - HSE](#)

⁶ [Lithium-Ion Battery Storage \(Fire Safety and Environmental Permits\) - Hansard - UK Parliament](#)



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opens this Council up to unnecessary costs in seeking to navigate this opaque regulatory landscape.

These matters are compounded by the absence of a singular regulatory body providing oversight into battery safety and installations, resulting in an even more fragmented and siloed approach to a subject that already cuts across several areas of responsibility in both the public and private sectors. As identified as part of the Grenfell enquiry, the lack of a clear regulatory framework, and lack of or disparate accountabilities contributed to the Grenfell tragedy. The concerns around BESS are ample, including but not limited to fire risk, public health and safety, water and air pollution, wildlife impacts and impacts to homes and businesses. Whilst attempts have been made at the national level to integrate local fire services into the planning and assessment process for BESS, this involvement is not yet mandatory and therefore lacks traction⁷. Local resilience forums are simply not acquainted with the risks associated with these installations, nor are they adequately resourced or set up to respond to any emergency or malfunction events.

This runs contrary to the national objectives of speeding up consenting regimes and going for growth, but more importantly risks avoidable disasters being inadequately prepared for with varying degrees of consequence.

Request for Assistance

This Council therefore seeks assistance on the following matters:

- Where are BESS sites (both under the 1990 Act and DCOs) situated in the hazardous substances consent regime, and do they require HSC?
- If COMAH and HSC are both not considered to apply to BESS, how are safety and environmental effects being permitted, noting that the installations include dangerous substances as defined by HSE guidance? This is particularly in reference to DEFRA's commitments to consult on environmental permitting for BESS by June 2025, which has not yet materialised at the time of writing this letter⁸.
- What is the status and proposed timeline of official central guidance on the relationship between BESS, COMAH and HSC regulations to support Local Authorities, developers, consenting bodies and regulators of such sites?

We propose urgent cross-government coordination to issue interim guidance, to offer clarity to all stakeholders interacting with BESS projects, including setting realistic expectations for local communities affected by them.

With the realities and harrowing lessons of the Grenfell disaster, this Council must be able to robustly enforce matters of non-compliance to protect our communities

⁷ [Battery Energy Storage Systems \(Fire Safety\) Bill - Parliamentary Bills - UK Parliament](#)

⁸ [Clean Power 2030 Action Plan: A new era of clean electricity – Main Report - GOV.UK](#)



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affected by BESS, as well as being able to appropriately plan for any less than favourable consequences of these installations to provide reassurance to those affected.

We greatly appreciate your attention to this urgent matter and are ready to meet and support this work.

Yours sincerely,

Cllr Anna Bailey
Leader

CC

[Redacted]
[Redacted]
[Redacted]

Charlotte Cane MP

From: "HAWKERDAWSON, Tom" <tom.hawkerdawson@parliament.uk>

Date: Tue, July 08, 2025 11:23 am +0100

To: John Hill <John.Hill@eastcambs.gov.uk>

CC: "CANE, Charlotte (MP)" <charlotte.cane.mp@parliament.uk>

Subject: Response from Minister

Dear John, I hope you are well. Charlotte has asked me to forward the attached letter to you, for your information. All the best, Tom Tom Hawker-Dawson (he/him) Chief of Staff for Charlotte Cane MP Member of Parliament for Ely and East Cambrid

Warning: Unusual sender <tom.hawkerdawson@parliament.uk>

You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

Dear John,

I hope you are well.

Charlotte has asked me to forward the attached letter to you, for your information.

All the best,

Tom



Tom Hawker-Dawson (he/him)

Chief of Staff for Charlotte Cane MP

Member of Parliament for Ely and East Cambridgeshire



Department for Levelling Up,
Housing & Communities

Lee Rowley MP

*Parliamentary Under-Secretary of State for Local
Government and Building Safety*

To: Local Authority Chief Executives, Local Authority
Leaders and
Chief Financial Officers in England, and
Local Audit Firm Partners

***Department for Levelling Up, Housing and
Communities***

Fry Building
2 Marsham Street
London
SW1P 4DF

18 July 2023

Dear Chief Executive / Chief Financial Officer / Local Authority Leaders / Local Audit Firm Partners,

This letter comprises an update on work since the Spring that DLUHC officials, along with Financial Reporting Council (FRC) colleagues, have undertaken to address the significant backlog of local audits in England and develop a sustainable solution to the timeliness challenges which the sector has faced in recent years. At the time of writing, only 27% of local audits have been completed for the financial year 2021-22. The combined total of outstanding local audits dating back to 2015-16 is now totalling nearly 520.

The attached paper derives from the recent work and outlines a proposed approach to resolving these issues, which has been agreed in principle with key partners across the local audit system. As Leaders of Local Authorities, Chief Executive Officers and Chief Financial Officers, you and your finance teams, alongside your auditors and Key Audit Partners, are critical to delivering high-quality financial reporting and audit in the public interest. As the paper suggests, decisive and concerted action is required to deal with the challenges in the local audit system. I would very much welcome your support in these endeavours and DLUHC officials will continue to engage with you as these proposals are further developed.

In summary, we are proposing that the National Audit Office (NAO) and DLUHC set a series of statutory deadlines for accounts preparers and auditors to clear the backlog of delayed audits for financial years 2015/16 to present. Auditors would then be required to provide as much assurance as possible for these outstanding years, reporting as normal any significant concerns they have on an organisation's financial controls and financial reporting, as well as financial resilience, governance and risk. Where necessary, it is intended that auditors would need to limit their opinion, making clear to the user of the accounts where full evidence hasn't been confirmed, and which the auditor is therefore unable to provide assurance over. Auditors' statutory duty to report on value for money (VfM) arrangements and their statutory audit powers (such as the power to make statutory recommendations or produce Public Interest Reports where necessary) will remain a high priority.

It will be the case that these deadlines may result in qualifications and disclaimers of opinion in the short term for a number of local bodies. We believe that these steps are necessary to reset the system and to restore the assurance which is provided by timely annual audits. Whilst further detailed work is needed across the Summer, there is broad consensus across the system that without any action being taken,

delays will continue for a number of years, and in that scenario, when the delayed audits are reported they will offer little if any assurance about the current position. In the meantime, there is a heightened risk of auditors not identifying and reporting on important, more current issues. We must ensure the capacity of the sector is focused on the most recent position as soon as possible.

It is critical that a repeat of the backlog is avoided in the future. Work across the local audit system must therefore be sustainable and ensure proportionate financial reporting requirements, auditing requirements and regulatory requirements are in place.

The Comptroller & Auditor General (C&AG) is therefore considering changes to the Code of Audit Practice on certain balances in the accounts to prevent continued local audit delays while a broader solution is sought. Potential changes would be time limited and would need to be supported by wider changes to standards and regulation. The C&AG will of course keep the Code of Audit Practice under review and will consider the effectiveness and operation of any changes made to the Code. This would inform a wider review of the measures to clear the backlog outlined above.

To support this broader work, it is important that the accounting framework set through the Chartered Institute of Public Finance and Accountancy's (CIPFA) Code of Practice on Local Authority Accounting carefully balances the need for adherence to financial standards against the needs of the users of local authority financial information, including ensuring the accounts are still useful and valuable to the taxpayer. CIPFA is therefore exploring changes to the Code for the medium and long term, in order to enable a more proportionate approach to the accounting requirements for local authority non-investment assets and pension valuations for a local authority context.

CIPFA has already made a temporary adjustment to the Accounting Code on the reporting requirements for valuation of local authority infrastructure assets, to support amendments to regulation made by DLUHC in December 2022. However, clearly a long-term solution needs to be developed. This will take longer than the current temporary measures (both legislative and Code based) allow. As such, DLUHC will seek to extend the changes made to legislation last year and CIPFA will consider whether the current amendments to the Code can be extended in tandem.

In terms of ongoing regulatory requirements, the FRC has committed to set out annually its planned regulatory programme, areas of focus and how its inspection activity serves the public interest. As part of this work, the FRC intends to clearly set out how its inspection activity will review auditors' work on operational assets and pensions valuation, the rationale for doing so and examples of good practice. The FRC's inspection activity will continue to review compliance with auditing and ethical standards, any revised Code of Audit Practice and associated guidance. The FRC is also working with auditors, practitioners and regulatory bodies to consider whether changes to the level of audit materiality may be beneficial. This work is expected to conclude before the end of the year.

The Levelling Up, Housing and Community Committee is conducting an inquiry into Local Financial Reporting and Audit. I gave evidence to the Committee on 17 July and I have shared a copy of the enclosed cross-system statement with the Committee Chair.

The proposals will be subject to further work and engagement across the system over the Summer, including with Section 151 Officers, Chief Executive Officers, elected representatives, the Local Government Association and audit firms. We look forward to discussing this further with you in the coming weeks and will ensure that there are arrangements in place to engage all parts of the local audit sector, including the range of local bodies. Subject to the conclusion of the appropriate details, we anticipate changes to the relevant codes and standards will be made in time for implementation to begin by the end of December 2023.

Yours sincerely,



LEE ROWLEY MP

**Parliamentary Under-Secretary of State for
Local Government and Building Safety**

LOCAL AUDIT DELAYS – CROSS-SYSTEM STATEMENT ON PROPOSALS TO CLEAR THE BACKLOG AND EMBED TIMELY AUDITS

Introduction

1. There has been a deterioration in the timeliness of local audit since 2017/18, with delays compounding during the COVID-19 pandemic, leading to a persistent and significant backlog of audit opinions. Since November 2020, the Department for Levelling Up, Housing and Communities (DLUHC) has implemented a wide range of measures to improve timeliness and the wider local audit system as part of its response to Sir Tony Redmond's *Independent Review of local financial reporting and audit*.¹ In addition, in December 2021 DLUHC published a further package of measures to improve local audit delays, which went beyond Sir Tony Redmond's original recommendations.
2. We recognise that fuller action is required. This note sets out a range of broad proposals and actions, agreed in principle with key partners across the local audit system, to address the backlog of local audits in England. Local audit is both a vital and independent source of assurance and a key element of the checks and balances within the local accountability framework, and we must collectively ensure that the local audit system is on a strong and sustainable footing for the future. There exists a shared resolve and commitment amongst the organisations referenced in this document to take action now to tackle the exceptional circumstances of the current backlog and ensure a return to timely delivery of high-quality financial reporting and external audit in local bodies,² in order to provide the vital accountability and assurance needed for local people and their elected representatives.
3. Further engagement and cross-system work will be needed this Summer to finalise the proposals outlined in this statement. Following this, we anticipate changes to the relevant codes and standards will be made in time for implementation to begin by the end of December 2023.

Context

4. Local audit completion for the financial year 2021/22 remains at approximately 27 percent, with the combined total of outstanding local audits dating back to 2015/16 now totalling nearly 520. This is clearly unacceptable. There is consensus across the system that there is now no alternative but to take collective action to resolve the backlog. Restoring timely audit and financial reporting will improve local accountability, strengthen the government's ability to identify warning signs of potential failure in local bodies and provide assurance to local residents about financial management and governance.
5. DLUHC, working with the Financial Reporting Council (FRC) as it prepares to commence the shadow system leadership role, has led urgent cross system work over the Spring - involving auditors, Section 151 Officers, regulators, government departments and other key stakeholders – to find a solution to reset the system.

ADDRESSING THE LOCAL AUDIT BACKLOG: PROPOSITION

6. Working together, the National Audit Office (NAO) and DLUHC intend to set a series of statutory deadlines for accounts preparers and auditors to clear the backlog of delayed

¹ [Local authority financial reporting and external audit: independent review - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/reviews/local-authority-financial-reporting-and-external-audit-independent-review)

² Local bodies include councils but also other relevant authorities as defined under the Local Audit and Accountability Act (2014)

audits for financial years 2015/16 to present. Auditors would then be required to provide as much assurance as possible for these outstanding years, reporting as normal any significant concerns they have on an organisation's financial controls, financial reporting as well as financial resilience, governance and risk. Where necessary, it is intended that auditors would need to limit their opinion and make clear to the users of the accounts those aspects or sections of a set of accounts which are not supported by sufficient, appropriate evidence, and which the auditor is unable to provide assurance over. Auditors' statutory duty to report on value for money (VfM) arrangements and their statutory audit powers (such as the power to make statutory recommendations or produce Public Interest Reports where necessary) are an important mechanism for assurance and for identifying areas of concern at an early stage, allowing councils to address them. Under these proposals this will remain a high priority.

7. These deadlines may result in qualifications and disclaimers of opinion in the short term for a number of local bodies. We believe that these steps are necessary to reset the system and to restore the assurance which is provided by timely annual audits. Whilst further detailed work is needed across the Summer, including to mitigate any unintended consequences of these measures, there is broad consensus from organisations referenced in this document that without any action being taken, the delays will continue for a number of years, and in that scenario, when the delayed audits are reported, they will offer little if any assurance about the current position. In the meantime, there is a heightened risk of auditors not identifying and reporting on important, more current issues. We must ensure the capacity of the sector is focused on the most recent position as soon as possible.
8. Where an auditor has to issue a disclaimer of opinion, however, there will still be a need to audit the opening balances of the subsequent set of accounts, as the prior year figures will not be covered by an unqualified auditor's opinion. The Department is seeking to ensure that work to clear the backlog of accounts takes place within a limited window of time. It will therefore consider measures to address any knock-on effects of the proposals which may impact the audit of opening balances within the accounts for future years and ensure the burden of auditing opening balances does not risk creating further delays. An important consideration will be ensuring there is appropriate assurance in place for opening balances for the start of the new contract period for the 99% of local bodies which have opted in to Public Sector Audit Appointments Limited's (PSAA) scheme.

Commitments by system partners

9. The **National Audit Office** is considering the development of a replacement Code of Audit Practice to give effect to the changes outlined above. This would include a requirement on auditors to issue the audit opinion for specific financial years in line with new statutory deadlines set out in legislation for the relevant authority. Auditors' statutory requirement to report on value for money arrangements would remain unchanged. Auditors would also be expected to facilitate a smooth transition during the contract handover period for the 2023/24 contracts. As part of this work the NAO will be establishing a specific Programme Board to provide the necessary governance to deliver a replacement Code of Audit Practice by the end of the year including the necessary consultation and Parliamentary process.
10. Alongside this **DLUHC** is considering whether legislative change is needed to:
 - a. set new statutory deadlines for local bodies to publish accounts to mirror the proposed changes to the Code of Audit Practice.

- b. address any knock-on effects of the proposals which may impact the audit of opening balances within the accounts for future years.
11. Under these proposals the **Chartered Institute of Public Finance and Accountancy (CIPFA)** would issue guidance to support accounts preparers to follow any amended regulations which set out new statutory deadlines, provided the authority is in receipt of the appropriate audit findings report from the auditor. CIPFA would also set out how Section 151 Officers should approach their responsibilities to certify the accounts in light of potential qualifications or disclaimers which may result from these proposals.
12. To support these changes, the **Financial Reporting Council (FRC)** will publish guidance on its regulatory approach to Major Local Audits³ (MLAs), articulating the importance of timeliness and compliance with statutory deadlines as an additional measure of audit quality. It will work with the NAO on the development of guidance where necessary to assist with the application of standards for these audits, including the need to meet the statutory dates. Local auditors will be required to have regard to and follow the NAO's guidance. The FRC's inspection activity would review auditors' compliance with auditing standards, the Code and relevant NAO guidance.
13. The FRC will use its broader supervisory role to ensure commitment from audit firm leaders to implement the policy measures and the steps that are being taken to meet the timetables for concluding historical audits. This route will be used to escalate any pervasive concerns the FRC has gathered on an audit firm's resilience, risk management and ability to deliver timely local audits and address their part of the backlog.
14. Under these proposals the FRC intends not to undertake routine audit quality reviews and inspections of MLAs for the historic audits up to the end of the 2021/22 financial year (though FRC will continue to inspect audit firms which deliver NHS audits). FRC will only conduct quality review inspections for historical audits where there is a clear case in the public interest to do so. The FRC will suspend the decision on the timing, scope, and coverage of inspections for the 2022/23 audits until there is confirmation of any revision to the NAO's Code of Audit Practice.
15. The FRC will need to ensure that its enforcement function is still able to appropriately gather information and evidence to determine whether, in the public interest, there should be an investigation into accounting or auditing issues where there are significant financial and governance failures.
16. The **Institute of Chartered Accountants in England and Wales (ICAEW)** is responsible for the inspection and regulation of non-Major Local Audits.⁴ The ICAEW proposes that its regulatory response to these measures will be consistent with the planned action of the FRC, as set out above.
17. **PSAA** is responsible for appointing an auditor and setting scales of fees for local bodies that have chosen to opt-in to its national scheme. A small number of authorities are not opted-in to PSAA's scheme and appoint their own auditors independently. Under these proposals, PSAA anticipates that it will need to determine final fees for opted-in authorities for the historic periods on a case-by-case basis. Its guiding principle in this will remain that if auditors have worked in good faith to meet the requirements of the Code of Audit Practice in place at the time the work was conducted, then they are due the appropriate fee for the

³ An audit of a local government body or NHS body with income or expenditure of at least £500m or a local authority pension scheme with at least 20,000 members or gross assets in excess of £1bn.

⁴ ICAEW's Quality Assurance Department (QAD) is responsible for reviewing local audits conducted under the Local Audit and Accountability Act that are not major local audits.

work done, and the body is due to pay the applicable fee, including where there is a disclaimer or qualified opinion. Conversely, if an auditor has collected audit fees in part or in full, and a change in requirements means that the total work done represents less than the fee already collected, then the auditor must return the balance and refund the body the appropriate amount – this ensures that the bodies pay only for work that has been done.

18. A number of **audit firms** with responsibility for local audits from 2015 have been a party to the development of these proposals, and under these plans would work with DLUHC, FRC and NAO on their professional commitment to the steps they would take to ensure successful implementation of the measures to clear the backlog. Such a commitment, underpinned by the auditors' professional duty to be independent and deliver consistent high-quality and timely work, would be welcomed by all parties within the system. Audit firms will of course need to operate in accordance with any changes to the Code of Audit Practice as well as continuing to fulfil their existing statutory duties.
19. **Chief Executive Officers, Section 151 Officers and Audit Committees** also play a critical role in delivering high-quality financial reporting. DLUHC will continue to engage Section 151 Officers and the wider sector as proposals are further developed over the Summer.
20. Under these proposals, Section 151 Officers will be expected to work with Audit Committee members (or equivalent) to approve the final accounts by the statutory deadline in order for the audit opinion to be issued at the same time. In addition, Chief Executives, Section 151 Officers, local authority Leaders and Chairs of Audit Committees should alert the auditor to significant organisational risks, critical decisions and changes in financial sustainability, and also where they have identified concerns on systems of financial control, financial reporting and capacity and capability to produce high-quality financial reporting on time. Where there are significant resilience risks, they should alert the auditor of the options, choices and alternatives that are being considered.
21. We will work with the **Local Government Association (LGA)** over the Summer, including to engage its members on these proposals. Under these proposals the LGA will support councils to understand their role in relation to external audit and that of auditors, and help councils communicate those messages to elected members and officers as necessary. The Department will also continue to engage with Section 151 Officers and treasurers' societies, in addition to representatives from the range of authorities impacted by these proposals.

LONGER TERM CHANGE

22. In order to prevent a recurrence of the backlog, it is essential that underlying issues which may have driven delays are addressed. Work will therefore progress with a number of organisations including the FRC, the NAO, CIPFA and the LGA to devise an escalated reporting framework for audit firms and local bodies to resolve issues ahead of statutory deadlines. We will also look to publish a list of local bodies and audit firms which meet statutory deadlines and those which do not.
23. Other underlying challenges will also continue to be addressed. The FRC is already leading work across the system to improve competition, capability and supply within the audit market. The FRC, supported by DLUHC, is committed to producing a workforce strategy by the end of the 2023 calendar year, which will identify gaps and barriers across the local audit system that are hindering the development of future capacity and agree actions and solutions to unblock these with stakeholders.

Local financial reporting, auditing and regulatory requirements

24. It is critical that a repeat of the backlog is avoided in the future. Work across the local audit system must therefore be sustainable and ensure proportionate financial reporting requirements, auditing requirements and regulatory requirements are in place.
25. Although reporting and disclosure requirements required by the Code of Practice on Local Authority Accounting have not changed for many years, there is a perception that both audit and regulatory expectations relating to the audit of non-investment assets have increased significantly in recent years. As a result, both account preparers and auditors frequently engage specialist valuers to provide the level of assurance which is thought to be necessary. In his review, Sir Tony Redmond noted a lack of consensus within the system over how to address this.
26. Local authority financial reporting must balance the need for adherence to financial standards against the needs of the users of local authority financial information, including ensuring the accounts are still useful and valuable to the taxpayer. Where reporting, auditing and regulatory standards combine to create pressures which delay timely reporting and audit, this should be addressed by responsible organisations across the local audit system. Doing so is vital in ensuring the delicate balance between high-quality financial reporting and user value is maintained.
27. There is also a question as to whether the level of work required for the current reporting and disclosures obligations on account preparers, which then require audit and oversight, is proportionate to their value to the user of the accounts, given the potential financial or governance risks are relatively low. All system participants therefore need to consider whether this work is proportionate to risk and a wise use of taxpayers' money, and will do so in the coming months.
28. Local authority accounts are consolidated within the statutory Whole of Government Accounts, which are prepared in accordance with International Financial Reporting Standards (as adapted and interpreted for the public sector). Since 2010 these standards have been reflected in the Code of Practice on Local Authority Accounting, which is independently set by CIPFA and passed by the CIPFA LASAAC⁵ board, under the advice of the Financial Reporting Advisory Board (FRAB) - an independent advisory board.
29. In light of these issues, the **Comptroller & Auditor General (C&AG)** is considering changes to the Code of Audit Practice relating to certain balances in the accounts to prevent continued local audit delays while a broader solution is sought. The C&AG is taking this action under the requirement of the 2014 Local Audit and Accountability Act that he should keep under review whether the existing Code continues to embody best professional practice with respect to the standards, procedures and techniques to be adopted by local auditors. As such, it reflects the seriousness with which he views the current delays in the local audit system. Potential changes would be time limited and would need to be supported by wider changes to standards and regulation.
30. The NAO has established a dedicated programme board, supported by at least three working groups, to develop the potential changes and related technical questions with stakeholders. A range of mechanisms will be considered to allow auditors to discharge their responsibilities to gather sufficient, appropriate and reliable audit evidence in accordance with International Standards on Auditing (ISAs).

⁵ Local Authority (Scotland) Accounts Advisory Committee

31. The C&AG, as he is required to do by the Local Audit and Accountability Act 2014, will keep the Code of Audit Practice under review and will consider the effectiveness and operation of any changes made to the Code. This would inform a wider review of the measures to clear the backlog outlined above.
32. **His Majesty's Treasury (HMT)** is conducting a thematic review of the valuation of non-investment assets such as roads and office buildings for financial reporting purposes across the public sector. The review is seeking to evaluate the advantages and disadvantages of the current valuation regime and consider the appropriate measurement options.
33. There are advantages to the alignment of central and local government accounting, including allowing local government accounts to be more easily consolidated into the statutory Whole of Government Accounts. As set out above, however, the level of work required by account preparers and auditors must not limit the value of the accounts to the user. **CIPFA** is therefore exploring changes to the Code of Practice on Local Authority Accounting for the medium and long term, in order to enable a more proportionate approach to the accounting requirements for non-investment assets and pension valuations for a local authority context. As a standard setter, CIPFA's guiding principle in approaching any changes to the reporting requirements adopted by the public sector in 2010 will be ensuring that high-quality financial reporting and the utility of financial statements to account users is maintained. As outlined above, any consideration of changes to accounting requirements will be accompanied by a broader set of measures from actors across the system.
34. CIPFA's work will run in parallel to HMT's thematic review. As the body responsible for local government accounting requirements, CIPFA is part of the working group HMT has set up for the review. CIPFA has clearly set out its view on the review's proposals. CIPFA will continue to work with HMT to ensure that any consequential changes to the Government Financial Reporting Manual (FReM) and the Code of Practice on Local Authority Accounting are considered fully to ensure that the users of local authority accounts are incorporated.
35. In addition, CIPFA has already made a temporary adjustment to the Code on the valuation and reporting requirements for local authority infrastructure assets, to support amendments to regulation made by DLUHC in December 2022. However, clearly a long-term solution needs to be developed. This will take longer than the current temporary measures (both legislative and Code based) allow. As such, DLUHC will seek to extend the changes made to legislation last year and CIPFA will consider whether the current amendments to the Code can be extended in tandem.
36. **The Financial Reporting Council (FRC)** has committed to set out annually its planned regulatory programme, areas of focus and how its inspection activity serves the public interest through alignment with the significant financial, accounting and governance risks facing local bodies. As part of this the FRC expects to clearly set out how its inspection activity will review auditors' work on operational assets and pensions valuation, the rationale for doing so and examples of good practice. FRC inspection activity will continue to review compliance with auditing and ethical standards, any revised Code of Audit Practice and associated guidance.
37. The FRC has also indicated, in principle, that if the audit and reporting requirements for operational asset and pensions valuations are revised, its intention will be to update the inspection approach to reflect the changes in these areas.
38. The FRC's Audit & Assurance Sandbox initiative is taking forward a specific policy discussion on the application of materiality by local authority auditors. The Sandbox brings together groups of auditors, practitioners, regulatory bodies and interested parties to explore, identify and develop solutions to specific technical and policy issues. The

materiality discussions are expected to conclude before the end of the year. Next steps could include, for instance, the FRC determining whether additional guidance is required to support how auditors set materiality levels for local bodies in line with auditing standards or working with those local audit suppliers who decide to set a different basis of materiality without such guidance.

Conclusion

39. The local audit system, which comprises all of the organisations listed above, recognises the need to restore the timeliness of financial reporting and audit in local government. That is why all system partners have made clear proposals to reduce the backlog of local audits in England which are detailed in this statement. The Government will continue to work with the FRC and all key partners across the system to continue this ambitious programme of work over the Summer. As noted above, this will include consideration of longer-term changes in order to create a more sustainable local audit system for the future.

14 July 2023

From: [REDACTED]@eastcambs.gov.uk>

Sent: 15 July 2025 10:06

To: PUCHER, Isabelle <isabelle.pucher@parliament.uk>; Cllr Anna Bailey
<Anna.Bailey@eastcambs.gov.uk>

Cc: John Hill <John.Hill@eastcambs.gov.uk>

Subject: MP QUARTERLY COULD LIAISON MEETING - THURSDAY 17 JULY 2025 - 10.00AM

Good morning all

Please see Agenda for the above meeting.

With kind regards.

[REDACTED]



CONFIDENTIAL

MP QUARTERLY COUNCIL LIAISON MEETING

THURSDAY 17 JULY 2025 – 10.00AM

CE's OFFICE/TEAMS

A G E N D A

Apologies:

- | | |
|---|----|
| 1. Bereavement Centre letter to the Minister and response | AB |
| 2. Fair Funding | AB |
| 3. Committee system being abolished | AB |
| 4. LGR | AB |
| 5. Any other business | |

Distribution
John Hill, Chief Executive
Cllr Anna Bailey
Charlotte Cane MP

From: [REDACTED]@eastcambs.gov.uk>

Sent: 15 August 2025 12:17

To: angela.rayner.mp@parliament.uk

Subject: Proposed changes to Planning Committee

Importance: High

Please find attached letter to the Secretary of State for her attention.



East Cambridgeshire
District Council

Joy Hennebry

EA to Director, Operations

Administrative Support to Directors

Chief Executives Department



01353 616301



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Rt Hon Angela Rayner
Secretary of State for MHCLG
House of Commons
London
SW1A 0AA

Ref AB/jh/Ldr/AR

15th August 2025

Sent by email only to angela.rayner.mp@parliament.uk

Dear Secretary of State

As the Government continues its drive towards delivering growth and achieving its target of 1.5 million new homes within five years of taking office, it is unsurprising that it considers changes necessary to ensure this ambition is realised.

Elected Members of all parties at East Cambridgeshire District Council have requested that I write to you to outline their significant concerns regarding the proposed changes to the democratic element of the planning process, specifically, the role of the Planning Committee.

East Cambridgeshire District Council regards itself as pro-growth and is demonstrably delivering on this commitment. We have a 6.2-year Housing Land Supply, and we are meeting the Government's Housing Delivery Test; the Council has been delivering a housing growth rate of just under 2%. The Council is firmly committed to providing the homes and infrastructure our area needs and has made Community Led Development a stated corporate priority; indeed the Council is a national leader in this regard.

While the Council has responded to the Government's consultation on this matter, the strength of local concern was such that Members considered it necessary to issue a further communication, reiterating our significant concerns to assist your understanding.

As in many other councils, planning matters attract considerable public interest in East Cambridgeshire. This interest is not confined to larger applications, which appear to be the primary focus of the Government's proposals, but extends to smaller developments, which can have a disproportionate impact on neighbouring residents. Such residents often feel excluded from the planning system by its very nature.

The Planning Committee provides the only opportunity for decision-making to take place in a fully transparent and public forum. The importance of this opportunity cannot be understated; it is local Members, by virtue of their direct engagement with constituents and detailed knowledge of local circumstances, that are best placed to determine when an application warrants consideration in a public forum to ensure transparency and maintain community confidence in the planning process. This function is of even greater importance in the context of Local Government Reorganisation, where decision-making is set to take place further from the communities affected as councils become larger and more remote.

In East Cambridgeshire, only a very small proportion of applications are referred to the Planning Committee - approximately 45 cases per year out of an average of 2,000

applications, representing just 2.25% of the total. Consequently, we do not believe that the Committee process significantly affects the speed of decision-making when weighed against the public interest and the need for transparent governance. Elected Members are deeply concerned that the proposed changes are undemocratic and would substantially reduce the ability for applications of significant local interest to be heard openly, denying residents the ability to engage fully in the process.

There is considerable concern that elected Members, whom residents reasonably expect to represent their interests, would have a diminished ability to influence decision-making in the wider community interest. The introduction of arbitrary thresholds to expedite large-scale developments risks creating an imbalance that could disproportionately affect how smaller applications are determined in the public eye.

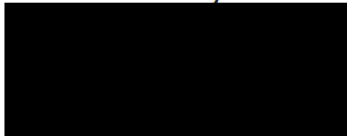
Further, as a Council committed to Community Led Development, we are troubled by the prospect that local communities would have fewer opportunities to participate in the planning process going forward.

We agree that the use of “call-ins” should be exercised with care and proportionality and this is well respected in our Council. However, removing this mechanism in the pursuit of growth would be misguided. The Planning Committee process occurs at the conclusion of the planning journey and does not materially delay applications. Rather, it provides public confidence that decisions are not made by a single, faceless individual, and that appropriate consideration is given to matters that impact people’s livelihoods and living environments. While we acknowledge that Committees elsewhere may resist growth, there are alternative mechanisms to address such issues without resorting to the wholesale removal of these powers - a step not supported by elected Members or, frequently, by Local Authority Planning Officers.

Accordingly, the Council urges the Government to reconsider its approach to these proposed changes. The clear outcome should be the delivery of growth in a sustainable manner, consistent with both National and Local Planning Policies. Where decision-makers persistently obstruct this aim or act in an untimely manner, targeted measures may be justified, but such powers should not be removed as a matter of course.

We appreciate your attention to this urgent matter and stand ready to meet with you to support the achievement of sustainable growth.

Yours sincerely



Cllr Anna Bailey
Leader of the Council

From: [REDACTED]@eastcambs.gov.uk>

Sent: 29 August 2025 11:59

To: [REDACTED]
[REDACTED]
[REDACTED]

stephen.timms.mp@parliament.uk

Cc: [REDACTED] CANE, Charlotte (MP)

<charlotte.cane.mp@parliament.uk>

Subject: Urgent request for guidance on Control of Major Accident Hazard and Hazardous Substances Consent in relation to Battery Energy Storage Systems

Importance: High

Please find attached letter to Matthew Pennycook MP for his urgent attention.



East Cambridgeshire
District Council

[REDACTED]

EA to Director, Operations

Administrative Support to Directors

Chief Executives Department



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Ministry of Housing,
Communities &
Local Government

Matthew Pennycook MP

Minister of State for Housing and Planning

2 Marsham Street

London

SW1P 4DF

Our reference: PO2025/19626

Cllr Anna Bailey
Leader
East Cambridgeshire District Council
Via email: [REDACTED]@eastcambs.gov.uk

01 August 2025

Dear Anna,

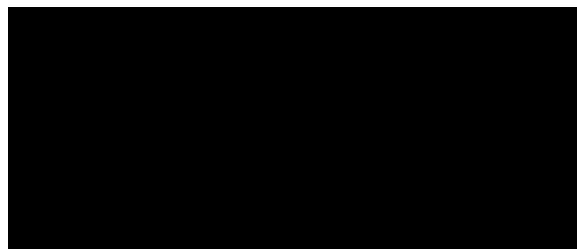
Thank you for your correspondence of 8 July regarding Battery Energy Storage Systems.

I appreciate how important this matter is to you and I am grateful to you for taking the time to write. I have asked my officials to address your concerns in the letter appended.

Please be assured that I am conscious of the matters you have raised, and I appreciate the insight your correspondence provides.

I hope the attached response suitably addresses your enquiry. If that is not the case, please don't hesitate to let me know.

Best wishes,



MATTHEW PENNYCOOK MP
Minister of State for Housing and Planning



**Ministry of Housing,
Communities &
Local Government**

**Ministry of Housing, Communities and
Local Government**
2 Marsham Street
London
SW1P 4DF

Our reference: PO2025/19626

Cllr Anna Bailey
Leader
East Cambridgeshire District Council
Via email: [REDACTED]@eastcambs.gov.uk

01 August 2025

Dear Cllr Bailey,

Thank you for your correspondence to which the Housing Minister has asked me to reply.

Upgrading the country's major economic infrastructure – including our electricity networks and clean energy sources, roads, public transport links and water supplies – is essential to supporting public services, supply chains, growing the economy, supporting the UK's transition to clean power by 2030, and enabling 1.5 million homes to be built over this Parliament.

Please be assured that the Department appreciates your concerns about the Sunnica development and the connected Battery Energy Storage Systems (BESS) and will consider the points you have raised. When an Nationally Significant Infrastructure Project (NSIP) is proposed, developers are expected to consult with local communities, local authorities, and other stakeholders to ensure that the views and concerns of stakeholders are incorporated into a project's design before a decision is made.

If an application for an NSIP is accepted by the Planning Inspectorate, an examination of up to 6 months duration would then take place. During the examination itself, members of the public, local communities and other interested parties would be able to submit views on the proposals in question. In addition to submitting written representations, relevant local authorities could also submit local impact reports setting out the potential impacts of the proposed scheme on their areas and how those impacts should be mitigated. These processes allow for any objections or concerns to be aired and fully considered by the Examining Authority in their examination of the proposals.

Very careful consideration would be given by the Examining Authority during the examination process to all the important and relevant matters, including representations made, any supporting evidence submitted, and answers provided to its questions set out in writing or posed at hearings. Once an examination closes, a report and recommendation are then provided to the relevant Secretary of State who would determine whether to grant or refuse development consent.

The Examining Authority also has a legal duty to test whether key environmental issues are being addressed on a case-by-case basis. Statutory consultees also play a crucial role by providing assessment and feedback on applications to ensure a balance between a number of needs, including environmental protections.

Furthermore, grid-scale lithium-ion batteries are regulated by the Health and Safety Executive (HSE) within a robust framework which requires responsible parties to take measures to ensure health and safety throughout all stages of a battery system's deployment. Battery developers and operators, who have the most detailed understanding of the risks involved in this technology, and who face the costs of repairing and replacing units in case of damage, have a duty to manage risks. They work closely with fire services to draw up emergency response plans.

The Department for Environment, Food and Rural Affairs (Defra) is considering further options, including environmental permitting, for managing the environmental and public health risks from fires at BESS sites. As outlined in the Clean Power 2030 Action Plan, Defra will consult on the principle of including grid-scale battery storage within the scope of the Environmental Permitting Regulations. Environmental Permitting would require BESS sites to demonstrate to the Environment Agency that harms are avoided or controlled (e.g. through specific fire prevention and emergency plans, firewater containment, and groundwater risk management). This would also provide for ongoing inspections.

I hope this provides some reassurance that if proposals come through the NSIP process, they will be thoroughly scrutinised and considered before any decision would be taken on whether consent should or should not be granted.

Thank you for taking the time to write.

Yours sincerely,

HOLLY HARPER
Deputy Principal Private Secretary



East Cambridgeshire
District Council

LEADER OF THE COUNCIL

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TO:

The Rt Hon Matthew Pennycook

MoS for MHCLG

The Rt Hon Angela Rayner

SoS for MHCLG

The Rt Hon Ed Miliband

SoS for Energy Security and Net Zero

The Rt Hon Sir Stephen Timms MP

SoS for DWP

The Rt Hon Steve Reed

SoS for DEFRA

Sent by email only to

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

stephen.timms.mp@parliament.uk

This matter is being dealt with by:
Cllr Anna Bailey

E-mail:

anna.bailey@eastcambs.gov.uk

My Ref: IE/MinSun

Your ref: PO2025/17052

Dear Matthew Pennycook MP

Subject: Urgent request for guidance on Control of Major Accident Hazard and Hazardous Substances Consent in relation to Battery Energy Storage Systems

Thank you for your return correspondence dated 1 August 2025, relating to our enquiry about the regulation of Battery Energy Storage Systems (BESS). As you invited in your covering letter, I am writing to you again, as I do not feel Ms Harpur's reply addressed or even commented on any of the issues we raised directly.

Your letter fails to provide any reassurance that the government has understood or indeed will be acting upon the concerns raised, or that any research into the Sunnica DCO or Hazardous Substances Consent has informed your response, as it is devoid of any reference or acknowledgement of the two.

My letter did not dispute that renewable energy sources and supporting infrastructure such as Battery Energy Storage Systems (BESS) are essential to supporting the UK's growth, but it was concerned with how the UK can reach this position safely and in the interests of its communities.

East Cambridgeshire District Council is very familiar with how a Nationally Significant Infrastructure Project (NSIP) process should be carried out. Indeed, its officers were present at the examination in public (EiP) for the Sunnica NSIP and worked extensively across all stages of the process both non-statutory and statutory to express concerns regarding the impacts of the project upon the district and its communities. The council's joint Local Impact Report, compiled with the relevant host authorities, covered matters of battery and fire safety explicitly.

It is accepted that battery fire safety and the need for Hazardous Substance Consent (HSC) were discussed by the Examining Authority during the EiP for the Sunnica NSIP and given

East Cambridgeshire District Council, The Grange, Nutholt Lane, Ely Cambridgeshire CB7 4EE

consideration. However, both the Examining Authority and Secretary of State failed to reach a conclusion as to whether HSC would be required and instead relegated this to a post-consent matter for this council to navigate with fellow Hazardous Substances Authorities.

There is therefore little reassurance that the NSIP process will always thoroughly scrutinise and consider all proposals, instead opting to sideline contentious and difficult matters such as HSC, as has been the case with Sunnica.

Whilst this letter and that preceding is not intended to re-examine how or why the Sunnica DCO came to be allowed or challenge its legality, it is intended to make clear a simple fact – regulation and guidance around BESS is lacking.

Despite the claim in your letter that grid-scale BESS exist within a ‘robust framework’, no evidence has been provided to support this. On the contrary, the research briefing in June 2025¹ sought to highlight this concern specifically, of which the following is particularly pertinent:

- There remains uncertainty as to whether lithium-ion or other batteries used in grid-scale BESS fall within the scope of the Fire Safety Order (2005), in turn raising uncertainty as to whether the local fire and rescue service can enforce against these sites (4.3 of the research briefing).
- Grid-scale BESS appear to fall outside of Building Regulations in terms of fire safety requirements due to how they are contained and the available exemptions, meaning the council’s Building Control department are likely unable to take any enforcement action should they have concerns with how the site has been designed or is operating (4.3 of the research briefing).
- There are no statutory provisions that require BESSs to adhere to industry standards (4.1 of the research briefing).
- If grid-scale BESS do operate within a ‘robust framework’, why are DEFRA and the Environment Agency actively considering environmental permitting? (4.5 of the research briefing).

All of the above point to a very real risk that grid-scale BESS fall through the gaps in existing legislation and guidance, and result in grey areas around statutory enforcement against sites that may pose a real danger to local communities and the environment.

Whilst battery operators and developers may have a duty to manage risk, and a cost attached to replacing any faulty or damaged BESS infrastructure, this alone does not guarantee accountability. It is an unfortunate fact that safety is often compromised for cost, a fact made only too clear in the Grenfell Tower disaster as set out in my previous letter.

The Grenfell Tower disaster highlighted specifically the need for a consistent approach in legislating and regulating public safety. It cannot therefore be left to individual operators and developers to ‘do the right thing’, particularly when noting that cost cutting, deregulation, and a failure to listen to safety warnings from the local community all have the capacity to result in the loss of life. It is considered these lessons must be followed when considering BESS.

Neglecting to plan for adverse outcomes is a risk we cannot afford, and this council is urging the government to take action in appropriately regulating and legislating BESS before it is too late.

The Council therefore reiterates its urgent request for assistance on the following matters:

¹ [Research Briefing - Battery energy storage systems \(23 June 2025\)](#)

- Where are BESS sites (both under the 1990 Act and DCOs) situated in the hazardous substances consent regime, and do they require HSC?
- If COMAH and HSC are both not considered to apply to BESS, how are safety and environmental effects being permitted, noting that the installations include dangerous substances as defined by HSE guidance? This is particularly in reference to DEFRA's commitments to consult on environmental permitting for BESS by June 2025, which has still not yet materialised at the time of writing this return letter².
- What is the status and proposed timeline of official central guidance on the relationship between BESS, COMAH and HSC regulations to support Local Authorities, developers, consenting bodies and regulators of such sites?
- To aid clarification around enforcement of the existing 'robust framework' of regulation around BESS, confirmation that the Fire Safety Order (2005) applies to lithium-ion and other batteries in grid-scale BESSs, and that these same BESSs are not exempted from Building Regulations in terms of fire safety.

We appreciate your urgent attention to this matter, we require clarity on our questions, which we appreciate are not straightforward, however we are ready to meet, if that may help clarify the Government's position on the above matters.

Yours sincerely,



Cllr Anna Bailey
Leader, East Cambridgeshire District Council

cc



Charlotte Cane MP

² [Clean Power 2030 Action Plan: A new era of clean electricity – Main Report - GOV.UK](#)

From: [REDACTED]@eastcambs.gov.uk>

Sent: 15 September 2025 14:52

To: emma.reynolds.mp@parliament.uk; emma.hardy.mp@parliament.uk

Cc: Cllr Anna Bailey <Anna.Bailey@eastcambs.gov.uk>; [REDACTED]

[REDACTED]@eastcambs.gov.uk>

Subject: AGRICULTURAL RESERVOIRS REPORT

Good afternoon

Please see letter and attachment from Cllr Anna Bailey, Leader of the Council.

With kind regards.

[REDACTED]

PA to the Leader



East Cambridgeshire District Council

The Rt Hon Emma Reynolds MP

Secretary of State for Environment, Food and
Rural Affairs

emma.reynolds.mp@parliament.uk

Emma Hardy MP

Minister for Water and Rural Growth

emma.hardy.mp@parliament.uk

This matter is being dealt with by:

Cllr Anna Bailey

Telephone: (01353) 665555

E-mail: anna.bailey@eastcambs.gov.uk

My Ref: SB/Reynolds-Hardy

Your ref

BY EMAIL

15 September 2025

Dear Secretary of State and Minister,

Agricultural Reservoirs Report – Providing water resilience and security to unlock growth in the region

I am writing to share with you a report from East Cambridgeshire District Council, setting out a practical and scalable response to the growing water crisis in the East of England and to request your support in piloting the reforms and regulatory innovation needed to make it a success.

At a time when the country faces growing pressures on water security, energy use, and food production, East Cambridgeshire District Council is taking decisive local action. Our district sits at the heart of the Fens—an area of national importance for agriculture and climate resilience, but increasingly exposed to the risk of flooding, drought, and water scarcity.

We have developed a proposal to create a **network of mid-sized agricultural reservoirs**, building on more than 80 already in operation across the district. These reservoirs, developed in partnership with farmers and linked to existing Internal Drainage Board (IDB) infrastructure, would capture surplus winter water which is currently discharged to sea and store it for use during the dry summer months. This stored water could support irrigation, biodiversity, and critically public supply.

This initiative offers a low-cost, high-impact solution with relevance well beyond our local area:

- Each reservoir can be delivered in under 3 years at a cost of £2–3 million



East Cambridgeshire District Council

- The approach reduces flood risk, supports agriculture and growth, and enhances biodiversity
- It complements national-scale infrastructure such as the proposed Fens Reservoir
- It offers an opportunity for environmental and carbon gains through smarter land and water use
- It provides a testbed for innovative, place-based approaches to climate adaptation

This is not a replacement for national infrastructure but a complementary strategy that offers speed, flexibility, and community benefit.

The water challenges facing East Cambridgeshire are also national ones. The East of England is the driest region in the UK, and one of the fastest growing. We face a projected shortfall of 800 million litres per day by 2050—an issue that risks derailing national ambitions for the Oxford-Cambridge Arc and the growth of Cambridge as an engine of innovation and inclusion.

To make this vision a reality, we are asking for your support to implement the following:

1. **Pilot water market reform and regulatory innovation in East Cambridgeshire**, including flexibility on abstraction, treatment, and trading.
2. **Amend legislation to empower Internal Drainage Boards** to store, trade, and distribute water, not just manage drainage.
3. **Expand the statutory role of local authorities** in strategic water planning to ensure equal partnership with utilities, regulators, and planning bodies.
4. **Introduce a duty on regulators (Ofwat, DWI, EA)** to support agile local solutions, including:
 - Local off-take contracts and seasonal abstraction with trading
 - Stronger regional input into Price Reviews (including outside PR24 cycles)
 - Reformed DWI rules to support local treatment solutions
 - New Appointments and Variations (NAVs) to allow access to wholesale networks
 - Regulated market creation for bulk raw water trading



East Cambridgeshire District Council

5. **Commission further evidence** on the environmental and carbon benefits of this approach.

These changes would remove the structural and legal barriers currently preventing councils, IDBs, and local stakeholders from delivering the sustainable water solutions the country urgently needs.

Water scarcity is already constraining housing delivery and investment in the East of England and continued uncertainty undermines confidence in the planning system and without action these risks will grow.

Our model supports growth, sustainable farming and food security, protection of peat soils and high-grade agricultural land and biodiversity recovery and reduced emissions. It will also enable delivery of the vision of the Cambridge Growth Company.

East Cambridgeshire is ready to lead. We have the infrastructure, the stakeholder relationships, and the political will to trial a new approach to water management—and to provide a model for rural districts across England.

But we cannot do this alone. We are calling on Defra to support our proposals and work with us to put in place the enabling legislative and regulatory framework to make them viable. We would welcome the opportunity to meet with you or your officials to present the report in more detail and to explore how East Cambridgeshire can help lead the national response to water challenges and deliver growth.

A copy of the report is enclosed for your information.

Yours sincerely,



Cllr Anna Bailey
Leader



East Cambridgeshire
District Council

A network of local reservoirs: Providing water resilience and security to unlock growth in the region

A report for East Cambridgeshire District Council

July 2025

“Be part of the region”

A unifying vision for the East of England

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Acknowledgements

This report has been prepared by the Eastern Powerhouse for East Cambridgeshire District Council. It draws on evidence submitted to the Independent Commission on the Water Sector Regulatory System (The Cunliffe Review) by Mr Matthew Bullock, Master Emeritus of St Edmund's College, Cambridge; Peter Landshoff, Professor Emeritus of Mathematical Physics, University of Cambridge; and David Newbery, Professor Emeritus of Applied Economics, University of Cambridge.

Wider engagement has been undertaken with council and parish council members in East

Cambridgeshire, as well as Internal Drainage Board representatives. Thanks also to Andrew Newton, Engineer, Ely Group of Internal Drainage Boards; John Shropshire, Chairman of G's Fresh and Matthew Bullock for their input to this project.

Foreword

In East Cambridgeshire, water security is not a distant challenge, it is a present and pressing issue that directly affects our ability to grow sustainably and provide the homes, jobs, and environment our communities deserve. The proposal set out in this report, to create a local network of agricultural reservoirs integrated with existing drainage infrastructure, represents a transformative opportunity.

By capturing surplus winter flows, water that currently has to be pumped out to sea at great expense - and storing it for use during the dry summer months, we can turn a flood risk into a vital resource. This approach not only reduces pressure on drainage systems during periods of heavy rainfall, but also ensures a steady supply for homes, businesses, and agriculture when it is most needed. In doing so, it creates opportunities to restore wetlands, rewet peat soils, and enhance habitats for wildlife, making our water system part of a wider effort to recover biodiversity. It is a practical expression of resilience working with the natural cycle of abundance and scarcity to safeguard our communities, support our economy, and protect the unique landscapes of the Fens.

This report addresses a stark truth, without a reliable and scalable water supply, East Cambridgeshire, and indeed, much of the East of England, will struggle to deliver the development our region urgently needs. As Leader of East Cambridgeshire District Council, I am proud that we are not only highlighting this challenge but stepping forward with practical, innovative solutions.

The proposal is not just about ensuring access to water, it is about unlocking a more resilient, sustainable, and inclusive future for our district and our region. By leveraging the ingenuity of local farmers, landowners, and institutions, we can create a smarter and greener system that meets demand, enhances biodiversity, and strengthens our local economy.

This is not a substitute for national infrastructure investment. Rather, it is a complementary and urgent local response that can help bridge the gap between ambition and reality. The water infrastructure that underpins our lives must evolve, and it must do so with local voices at the table and local leadership at the helm.

East Cambridgeshire is ready to lead. This report is our call to action, for government, regulators, and partners across the region to join us in turning a local solution into a national exemplar.

CLlr Anna Bailey

Leader,
East Cambridgeshire District Council

1. Introduction

East Cambridgeshire is a low-lying rural district primarily located within the South Level of the Fens, the UK's largest coastal wetland. The district is highly exposed to climate-related risks from rising sea levels, increased frequency of heavy rainfall, higher average temperatures, and prolonged droughts. The Fens have already experienced damaging events, including the tidal surge of 2013 and the drought of 2018. 2022 was also a hot dry summer which caused water shortages, while 2025 could turn out to be a more serious issue than previous years. In 2018 and 2022 the farmers with adequate water had record breaking crop yields. With adequate supply of water the hotter weather will make the region's agricultural sector more productive, representing an economic opportunity. These incidents, while episodic, reveal systemic fragilities that threaten assets, land use and livelihoods.

East Cambridgeshire's economic future hinges on its ability to adapt to these changes. The local authority, working with the Mayoral Combined Authority and external agencies, has a pivotal role in planning for the transition toward climate resilience. But in doing so the district faces several competing policy challenges.

East Cambridgeshire is one of the fastest growing rural districts in the country. New housing and infrastructure are urgently required to meet the substantial increase in population, with communities being planned to the north of Ely, as well as in Soham and Littleport. The local economy is heavily dependent on agriculture, food production, tourism, and a growing base of knowledge intensive employment linked to Cambridge.

In addition, the ambition to further grow the wider regional economy, particularly in and around Greater Cambridge, will require the provision of secure and sustainable water and waste services. This presents a considerable challenge to the integrity of the water system and the natural environment, which underpins not just housing growth but jobs, land value, and food security.

Uncertainty over long term water supply and infrastructure planning is creating a bottleneck for housing and inward investment. Major developments have been stalled due to concerns over water scarcity. At the same time economic development must be aligned with wider environmental goals, to protect Grade 1 and all good quality agricultural land, and limit CO2 emissions, habitat loss, soil degradation, and biodiversity decline which demand a more sustainable and integrated approach to land management.

This report offers a regional perspective on the UK's water policy framework. It puts forward a practical proposal to build a network of agricultural reservoirs in the Fens, which can provide an affordable, sustainable and secure water supply while protecting the environment. This is not an alternative to the plans for a new reservoir in the Fens. Rather it is a complementary solution that can help meet the growing demands on water supply in the East of England up until, and after, a new reservoir is completed.

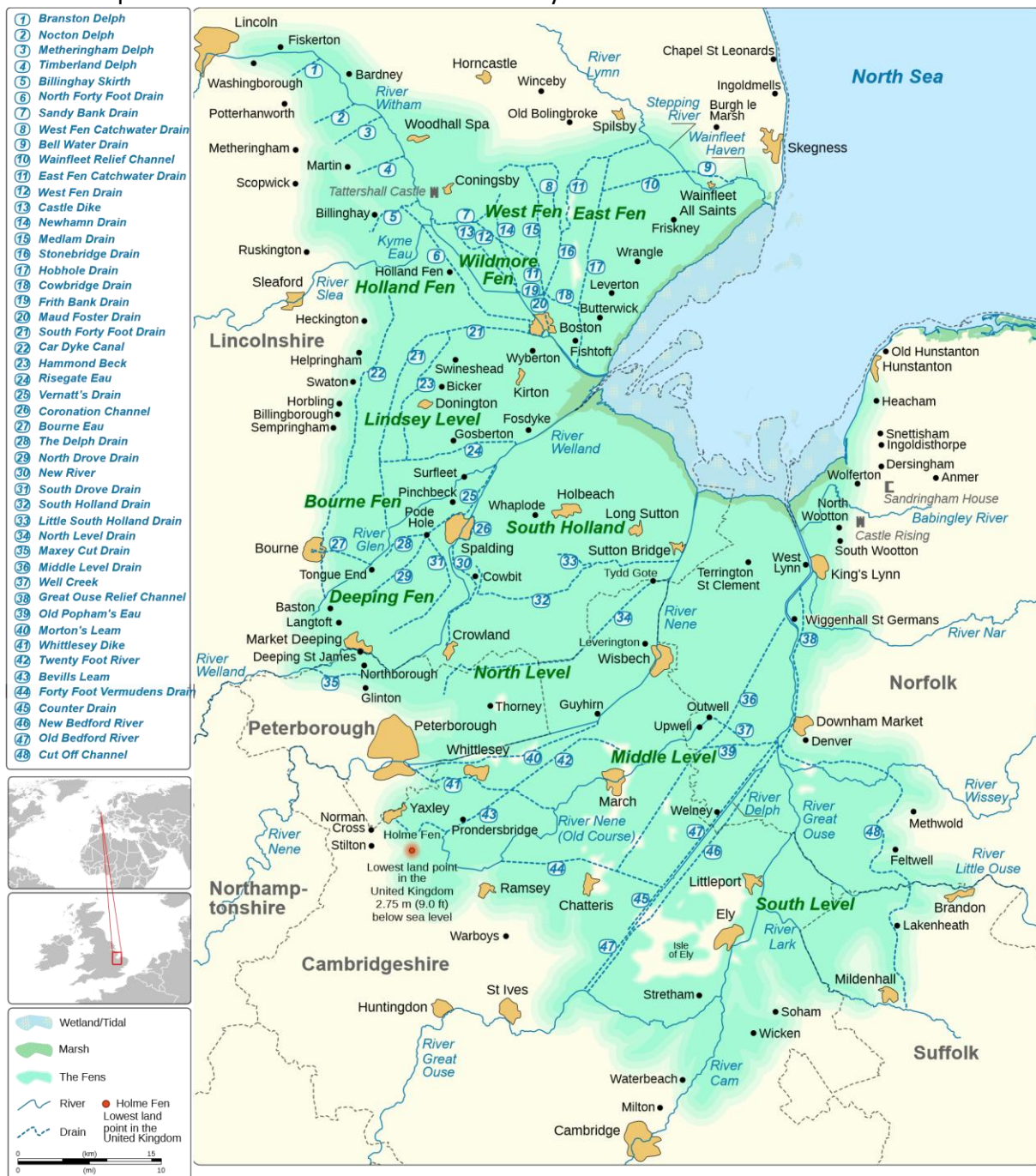
This proposal is focused on integrated catchment and management to establish a local water system that enhances national infrastructure, accelerates economic delivery and addresses increasing climate change. With strong local leadership and vision this can position East Cambridgeshire as a key player in the region's transition to a more sustainable economy while offering a model for other rural districts in the region to adopt a similar approach and unlock the potential for growth.

2. The Climate Change risk to the Fens

The Fens, or Fenlands, are a low-lying region historically characterised by marshland and covering nearly 1,500 square miles across parts of Lincolnshire, Cambridgeshire, Norfolk, and Suffolk. Though largely inland, most of the Northern and Middle Level Fens lie close to the Wash and remain just a few metres above sea level, although the Southern Level is slightly below sea level making them especially vulnerable to floods.

Over centuries, the land has been systematically drained using dykes, man-made rivers, and pumping stations to enable agriculture and settlement. While this has transformed the area into one of the UK's most productive farming regions, containing around half of England's Grade 1 agricultural land, vital to the UK's food security, it has also caused the land to subside over time, necessitating ever higher flood defences.

Ecologically, the Fens were originally rich wetlands with unique water chemistry supporting distinctive habitats and species. Much of this natural biodiversity has been lost due to land reclamation.



The Fens are highly vulnerable to climate hazards due to their low elevation, extensive reliance on drainage infrastructure, and intensive land use. The '[Fens Climate Change Risk Assessment](https://awinnovationhub.co.uk/wp-content/uploads/2024/11/Fens-Climate-Change-Risk-Assessment-Final-4.pdf)' (Jenkins, K., Nicholls, R.J., Sayers, P.B, Redhead, J., Price, J., Pywell, R., He, Y., Minns, A., Tozer, N., Carr, S (2024) The UK Fens Climate Change Risk Assessment: Big challenges and strategic solutions. Tyndall Centre for Climate Change Research, University of East Anglia, Norwich) identified a number of challenges facing the Fens region of eastern England, including:

- flood risk (tidal, fluvial, surface) which is expected to increase, with more frequent and severe events due to sea level rise and changing rainfall patterns
- drought and water scarcity which will also become more pronounced, threatening both agriculture and water-dependent ecosystems

Sea levels around the Fens are projected to rise by 0.29 to 1.15 metres by 2100, depending on emission scenarios. This poses significant long term risks to flood defences, drainage systems, and land viability.

More intense rainfall and rising groundwater levels, combined with ground subsidence (natural and agricultural) will put greater pressure on drainage infrastructure, and the need for Internal Drainage Boards (IDBs) to increase pumping capacity. Many existing assets are ageing and will require substantial investment or reconfiguration.

The Fens' £3 billion agricultural economy is highly sensitive to both flooding and drought. Crop yields may be impacted by changes in growing seasons, soil salinisation, and water shortages. So, without adaptation, economic productivity, food security, and land values are at risk.

Wetlands and peat soils are key carbon stores and habitats. Peat degradation and drying accelerate CO₂ emissions and reduce resilience to climate change. Opportunities exist to enhance nature based solutions like wetland restoration, floodplain reconnection, and regenerative agriculture.

Over 350,000 people live in the Fens and many of these communities have relatively high levels of deprivation and rural isolation. Heat, flood, and service disruption risks are expected to disproportionately affect vulnerable communities without targeted intervention.

The challenges suggest an urgent need for adaptation planning through:

- catchment wide water management
- infrastructure renewal
- policy reform to support land use transition
- community engagement and local leadership
- long term investment frameworks

East Cambridgeshire falls squarely within the Fens area and shares many of the identified risks. This reinforces the urgency for the local authority to:

- invest in integrated water infrastructure systems
- support farming transition and agri-environment schemes
- plan for housing and economic growth under changing environmental conditions
- engage in regional partnerships, for example, with the Fens Panel, Water Resources East, Internal Drainage Boards, Cambridgeshire and Peterborough Combined Authority, and the Cambridge Growth Company

3. The national and regional water challenge

Across England, the security and sustainability of water supply is under strain. As outlined by the Environment Agency, over extraction from chalk aquifers and river systems threatens both ecosystems and long term public supply (Environment Agency (2021). Water Resources Planning). The East of England is at the frontline of this risk. Chalk streams, such as the River Cam and Lark, are experiencing depletion, while peat soils across the Fens are drying and oxidising, contributing to carbon emissions and biodiversity loss. With low rainfall, intensive agriculture, and population growth focused on Greater Cambridge, it is one of the most water stressed areas in the UK (Water Resources East (2022). Regional Water Resources Plan).

The region faces a projected water shortage of 800 million litres per day by 2050 representing about one third of current use. The water supply is insufficient to meet the projected population growth of 6 percent let alone ambitious growth plans. Although Cambridgeshire is one of the driest regions in the country the problem is not a lack of water. Indeed, the Fens are traversed by a complex network of rivers, streams, dykes, and drains which were created to manage water levels and facilitate agriculture.

Three major rivers run through the county, the Nene, the Ouse and the Cam. The Nene and the Ouse are long rivers, drawing water from the Northamptonshire Cotswold hills and Bedfordshire plateau, before crossing the county, the Cam draws its water from chalk aquifers and streams along the local East Anglian Heights, part of the Chiltern hills. All three rivers deliver substantial excess water during the winter months. Indeed, significant efforts have to be made in the region to pump excess water out into the North Sea, at great cost to Fenland farmers and taxpayers, only then to restrict water supplies for all users during the summer. Dependent on rainfall, huge volumes of water are pumped out at great cost every day through at least six months of the year (usually, but not only, the winter). The rivers are above sea level, and above the level of surrounding land, so this water is pumped up into the rivers which discharge into the Wash and the North Sea. All the South Level water goes into the Wash through Denver Sluice. The issue is therefore not simply about scarcity, it is also about the capacity to store water and the ability of existing systems to respond dynamically to growth.

The UK has not provided adequate investment in major infrastructure solutions over many decades, the last major reservoir in England was completed in 1992 (Carsington Water is a reservoir, operated by Severn Trent Water, between Wirksworth and Kniveton in Derbyshire, England. It is England's ninth-largest reservoir with a capacity of 36,331 megalitres. Planning for the reservoir started in the 1960s. The finished reservoir was opened by Queen Elizabeth II in 1992.) and the current water management system does not encourage innovation or private investment in water storage, while regulation suppresses the potential for developing local water economies. The position is further complicated by numerous agencies (the Environment Agency, Ofwat, the Drinking Water Inspectorate) operating in relative silos.

Although East Cambridgeshire District Council has not received any formal objections to development from the Environment Agency on the grounds of unsustainable water abstraction, the neighbouring districts of Huntingdon and South Cambridgeshire have faced objections to housing schemes(www.localgovernmentlawyer.co.uk/planning/401-planning-news/54371environment-agency-objects-to-4500-homes-schemes-in-cambridgeshire-over-watersupply-fears). This constraint places local authorities in a policy bind. On the one hand, they are mandated to enable housing and employment growth; on the other, they must ensure that development is environmentally sustainable and consistent with statutory water and climate objectives. The status quo, in which responsibility for

infrastructure rests primarily with private water companies regulated at national scale, is proving inadequate to respond with the speed and spatial sensitivity required.

The National Infrastructure Commission (NIC) acknowledged this difficulty in their report on water supply infrastructure which called for 'a new model of shared responsibility between central government, regulators, utilities, and place based institutions to accelerate delivery' (National Infrastructure Commission (2023). Meeting the Challenge: Long-Term Water Supply Infrastructure, page 38). East Cambridgeshire is ready to be that place.

4. The limits of centralised water infrastructure

Major infrastructure responses are already in development. Over the longer term the proposed new reservoir near Chatteris, led by Anglian Water at a projected cost of 2.2 billion pounds, is intended to serve the broader East Anglia region. However, the timeline for delivering this reservoir extends to 2036 at the earliest and could feasibly go beyond this by many years given the size and complexity of the development. When completed the reservoir will have a water surface area of 5 square kilometres and a capacity of 55 million cubic meters (55,000,000,000 litres).



In the shorter term Cambridge Water and Anglian Water plan to build a 25-kilometre water pipeline between Grafham Water and Cambridge, at a cost of £12.4 million. A preferred route for the pipeline has been identified and an Environmental Impact Assessment (EIA) Scoping Report has been submitted to Local Planning Authorities (LPAs) crossed by the route, namely Huntingdonshire District Council and South Cambridgeshire District Council. A planning application is expected to be delivered in 2026, but as an interim and partial measure this will not be implemented before 2032.

There is much scepticism about the timelines for these plans and whether they will ultimately meet demand. Water Resources East are forecasting that neither the Grafham or Chatteris options will be sufficient and that up to half of the Eastern Region's water will need to come from desalination. Even if they successfully deliver the projected volumes of water on time, these plans will still limit Cambridge's growth substantially in the interim and will threaten nature and the economic life of the Fens.

Meanwhile, constrained supply is already halting or delaying new housing developments in Cambridgeshire. Strategic sites in St Neots and Impington have encountered objections on water availability grounds.

This long lead in time is a critical problem. The current water regulatory system, centred on 5 year price review periods (PR24, PR29), means that innovative solutions struggle to be delivered outside the pre-approved investment cycle. Moreover, this centralised capital intensive investment leaves little room for place based innovation.

Even the proposed treatment works at Waterbeach, which could process non potable water from local reservoirs or abstraction sources, lacks a clear regulatory or funding pathway. Without reform, the system will continue to act as a brake on regional development.

5. A local model for water storage and public supply

A network of agricultural reservoirs could potentially supply the incremental demand for water in Cambridgeshire, until such time that a major reservoir is delivered. The primary target for the South Level Project is to support Cambridge Water's supply for Greater Cambridge. Access to this additional water could be provided by a group of large farmers, held in a network of mid-sized agricultural reservoirs, based across the catchment area of drains, dykes and rivers managed by the Internal Drainage Boards.

The council already supports farmers through the local planning regime and there are currently over 80 agricultural reservoirs across the district, all fully licensed for cropping. Just 7 farmers hold 5.4 million cubic metres of water in 24 mid-sized reservoirs. This is equivalent to 10% of the planned capacity at Chatteris. These mid-sized agricultural reservoirs are connected by the IDB water network and currently meet agricultural needs. But they could provide a valuable supply of drinking water, although not all are suitable for supply without investment.

The development of an agricultural reservoir network across the South Level Fenland catchment could provide a practical and regionally distinctive answer to the immediate need. Crucially, this is not a call to replace national infrastructure projects. Rather it is a complementary approach that can provide timely, localised solutions.

Additional reservoir capacity will help to unlock the housing growth required in Greater Cambridge while protecting the environmental assets of the Fens. It will also support the Department for Environment, Food and Rural Affairs' (Defra) aims and allow the development of a 'dynamic mosaic' land use pattern, increasing higher water tables in agriculture and providing for more water in the landscape, while also benefitting biodiversity.

The proposal

This model, which is currently being advanced by a consortium of farmers and local landowners, would utilise winter high flows from the Cam Washes and Lower Ouse catchment, which are technically part of the Middle Level, storing water for both agricultural use and public supply. Stored water would be transferred via the IDBs to Waterbeach for treatment and supply to Greater Cambridge

The findings of a recent technical study, commissioned by the Environment Agency, suggests that a network of 7 new mid sized agricultural reservoirs could store 6 to 7 million cubic metres (Mm³) of water, particularly if licensed storage was focused on the lower level Fens area (Cambridge PWS Local Resource Option Study, JBA Consulting, March 2025). These could be built in under 3 years at a cost of between 2 to 3 million pounds.

Costings of a proposed 500Mm³ reservoir at Waterbeach - FC Palmer and Sons (Cambridge PWS Local Resource Option Study, JBA Consulting, March 2025, page 72) The reservoir is plastic lined and was constructed in 2020 using red diesel.

The total cost of construction was £1,105,000 at 499,955 cube (£2.21 per cube).

This included all landscaping, professional fees for planning, archaeology, environment impact assessments re construction and supervising engineers from Mott MacDonald as well as safety fencing/lifesaving equipment. There are no costs for pumps within the £1,105k and the land is in at £0.

At 85% utilisation, each reservoir would provide water for 7,000 people a year, assuming 150 litres per person per day. Combined with improved demand reduction measures and the interim Grafham Water junction, this could be enough to meet projected housing growth over the next 15 years.

In the longer term it is highly probable that this supply would become a permanent supplement, and the scheme might gradually include more reservoirs. Future capacity could be regularly assessed with new reservoirs brought on stream as growth unfolds. This model offers multiple benefits, including:

- speed, agricultural reservoirs can be designed, consented, and delivered within 3 years
- flexibility and scalability, infrastructure can expand incrementally in line with housing and employment growth
- low carbon, using gravity fed drainage systems and storing water at elevation reduces energy intensity
- environmental co-benefits, supports peatland rewetting, biodiversity habitats, and drought resilience
- cost, estimated at 2 to 3 million pounds, a network of agricultural reservoirs would cost £4 to £5 per cubic meter of water compared with £40 per cubic meter from Chatteris

The combined costs of a network will depend on how many agricultural reservoirs are included. Current figures are based on 7 farmers with 24 reservoirs holding 6 million cubic metres, however, there may be many more agricultural reservoirs with more capacity, in addition to what sits in the IDBs ditches and drains.

Parameter	Chatteris Reservoir	Agricultural Reservoir Network
Capacity (Mm ³)	55	6 to 7
Unit cost (£/m ³ approx.)	£40	£4 to £5
Delivery timeframe	10 to 12 years	Less than 3 years per unit
Carbon/environmental impact	High	Low, plus potential peatland benefits

Creating a new local water market

The development of agricultural reservoirs would create a new 'water market' stimulating trade in water, between farmers, and into the local water supply network to provide public drinking water, at a price to be agreed. This would provide an additional income for farmers and IDBs helping to stimulate the wider East Cambridgeshire economy.

Farmers and landowners would be expected to bear the costs of building new reservoirs on their land on the understanding that these assets would generate revenues to cover costs and make the enterprise commercially viable. Finance arrangements including public-private arrangements will need to be considered to share costs, risks and potential rewards.

A key component of the proposed scheme is a new water treatment works that will need to be built at Waterbeach to serve the South Level. A large water treatment works is planned for the Chatteris reservoir, however, a separate water treatment works would be required to mobilise the storage project in the South Level.

Cambridge Water may be the eventual owners of the proposed Surface Water Treatment Works, although alternative financiers of the works could be found. The primary party responsible for funding the new waste water treatment works at Waterbeach is Anglian Water, as outlined in the [Cambridge Waste Water Treatment Plant Relocation Order 2025](https://www.legislation.gov.uk/uksi/2025/452/made#:~:text=Benefit%20of%20Order,affected%20by%20the%20authorised%20development) (www.legislation.gov.uk/uksi/2025/452/made#:~:text=Benefit%20of%20Order,affected%20by%20the%20authorised%20development). The order specifies that the works are for the benefit of Anglian Water, with some exceptions for the benefit of landowners and other affected parties.

Anglian Water's eventual outputs from Honey Hill will be for Waste Water Treatment capacity, which could feasibly be added to the proposed Water Treatment Works at Waterbeach. Anglian Water could therefore be involved in the planning. In addition, since Waterbeach sits on the border of the Cambridge Water and Anglian Water patches, Anglian Water might well be interested in taking water for East Cambridgeshire and beyond.

Anglian Water's eventual outputs from Honey Hill will be for Waste Water Treatment capacity, which could feasibly be added to the proposed Water Treatment Works at Waterbeach. Anglian Water could therefore be involved in the planning. In addition, since Waterbeach sits on the border of the Cambridge Water and Anglian Water patches, Anglian Water might well be interested in taking water for East Cambridgeshire and beyond.

The estimated costs for this facility vary greatly, between 40 million pounds (Cambridge PWS Local Resource Option Study, JBA Consulting, March 2025, page 65, paragraph 27 and page 79) and 200 plus million pounds, depending on the scale of the water to be treated and the capacity of proposed reservoirs. Consultants JBA suggested it might be 132 million pounds for a 25 ML/d works, but Cambridge Water estimates the cost to be over 200 million pounds. All this points to the need for a more detailed technical study. This is still a relatively small sum in the context of sustaining the continued growth of Greater Cambridge, provided a longer term use for the works is confirmed to supplement Cambridge's water supply beyond the opening of the Chatteris reservoir.

It is worth noting that the costs of desalination plants in Norfolk would be significantly higher.

6. Reforming the regulatory system

Water regulation in England is primarily driven by a framework of national institutions, Ofwat, the Environment Agency, and Defra, each with distinct, sometimes overlapping mandates. While this structure was designed to promote environmental protection, efficiency, and value for consumers, it has also resulted in fragmented and siloed decision making. In practice, local authorities like East Cambridgeshire District Council are excluded from key decisions that affect infrastructure planning, investment timing, and capacity allocation.

There are a number of regulatory barriers that constrain the development of new innovative approaches to developing a local water system:

- the Environment Agency's rules for abstraction and discharge licences are difficult to obtain for non traditional actors which restricts trade
- the Drinking Water Inspectorate limits new treatment solutions
- Ofwat focuses on incumbents rather than new market entrants
- environmental and economic concerns are misaligned

- Internal Drainage Boards are statutory bodies whose responsibilities are defined by law (the Land Drainage Act 1991 and subsequent legislation) cannot currently sell or treat water beyond drainage functions

The legislative empowerment of the IDBs is a critical issue to enable the creation of an active water management and trading system in the Fens. While many IDBs now operate under the general legislation, some were initially established or had their powers modified by Private Acts of Parliament, which limit the IDBs' statutory powers. These need to be replaced under a single enabling piece of legislation, to create more dynamic powers for water management.

The Price Review process, which governs water company investment cycles (Asset Management Periods or AMPs), has historically failed to account for local development trajectories. The rigidity of these cycles, along with a cautious approach to cost recovery and risk by water companies, restricts flexible, agile investment responses and creates a structural disconnect between local housing delivery needs and regulatory timelines. This has contributed to stalled planning applications and investment bottlenecks in Cambridgeshire, even in areas identified for growth in the Local Plans.

The case for reform lies in creating a system that is more accountable, transparent, and responsive to place based needs. For the Fens any such reform would also need to take account of the Internal Drainage Boards and their current funding model. The challenges are structural and growing more acute as climate change impacts, including:

- rising maintenance and upgrade costs for ageing infrastructure (pumps, sluices, and embankments are decades old)
- energy costs for pumping (especially in low-lying areas below sea level) are rising sharply, placing additional strain on IDB budgets
- limited and inflexible revenue streams, primarily through drainage rates paid by landowners and local authorities that are not tied to the actual cost of operating or modernising the network
- no statutory remit (and therefore no funding stream) for water storage or supply.
- lack of access to long-term capital funding
- increasing operational demands without matching resources

Stronger regional input into Price Reviews is also required. This should include expanding the statutory role of local authorities in strategic water planning, and piloting place based infrastructure partnerships that include regulators, utilities, and councils as equal partners. A shift toward outcome based regulation, as opposed to input or process driven models, could support a more agile and responsive approach.

Moreover, there is a growing consensus, shared by institutions such as the National Infrastructure Commission, Local Government Association, and Waterwise, that water must be governed as a core enabler of place making. This would require shifting the focus from narrow environmental compliance or bill minimisation to a wider understanding of water as fundamental to economic resilience, health and environmental justice.

The Independent Commission on the Water Sector Regulatory System (the Cunliffe Review) has highlighted several key issues with the current water sector regulatory system in England and Wales, emphasising a need for significant reform (Independent Water Commission Interim Report 3 June 2025).

In its interim report the Commission found that the system lacks clarity, has eroded public trust, and isn't delivering desired outcomes, particularly regarding environmental protection and customer satisfaction. The Commission's findings call for a 'fundamental reset' and 'root and branch reform'.

1. Clearer strategic direction and planning. This includes aligning water plans with other government priorities like housing and industrial strategy and to improve coordination with local authorities.
2. Review and consolidation of legislation. To provide a common purpose for companies, investors, and regulators.
3. New regulatory approach. A move towards a more 'supervisory' and responsive approach to regulation with mandatory requirements for mapping and understanding asset condition, alongside safeguard against excessive dividend payments.

In essence, the Commission's interim findings paint a picture of a water sector struggling to meet the needs of customers and the environment due to systemic flaws in regulation, planning, and asset management.

There is an expectation that the Commission's final report will need to address the mechanisms that are constraining the Public Water System.

7. Governance, accountability, and civic leadership

The question of who should own, operate, and be accountable for water infrastructure is not merely technical. It goes to the heart of public trust and effective delivery. A new settlement is needed, in which local authorities, water users, and regional partnerships have a seat at the table.

Local authorities like East Cambridgeshire District Council are on the front line of managing water related risks and enabling sustainable development. Yet, under the current governance system, councils often have limited influence over infrastructure investment decisions made by national regulators and water companies. This democratic deficit undermines the ability of local leaders to deliver housing, economic growth, and environmental resilience in an integrated way.

The Government has committed to empowering regions through deeper devolution and more locally accountable institutions. For East Cambridgeshire, which falls within the Cambridgeshire and Peterborough Combined Authority, this presents an opportunity to embed water governance into broader place-based economic planning. However, further reforms are needed to give councils a stronger voice in shaping regulatory decisions and infrastructure priorities.

[The English Devolution and Community Empowerment Bill](https://bills.parliament.uk/bills/4002) (<https://bills.parliament.uk/bills/4002>) will introduce new Strategic Planning and Spatial Strategy powers for Mayoral Combined Authorities giving regions like the Cambridgeshire and Peterborough a stronger mandate to integrate housing, economic development, and infrastructure planning. These powers will enable the combined authority to prepare a statutory spatial strategy that can align growth with long term infrastructure needs, including water supply and flood resilience.

For East Cambridgeshire, this creates an important opportunity to embed local water management priorities, such as the development of agricultural reservoirs and enhanced drainage networks, into a region wide growth framework. By ensuring that water availability is treated as a core constraint and enabler of development, the combined authority can sequence housing and employment growth in line with the delivery of new water infrastructure, reducing the risk of stalled developments and protecting environmental assets.

East Cambridgeshire District Council has played a proactive role in convening partners across the water sector, agriculture, and planning, to highlight system bottlenecks and identify specific solutions. Building on this leadership, the council as part of the Cambridgeshire and Peterborough Combined Authority should seek greater statutory influence within regional water forums, strategic infrastructure boards, and future investment pipelines.

The establishment of a Cambridgeshire and Peterborough Water and Growth Board would bring together Anglian Water, Cambridge Water, the Environment Agency, relevant IDBs, local authorities including the Cambridgeshire and Peterborough Combined Authority, developers, and community representatives to coordinate water infrastructure planning and delivery.

Such a board would support more integrated infrastructure sequencing, clearer accountability for delivery, and greater transparency over investment decisions. It could also act as a conduit to national bodies such as Ofwat and Defra, ensuring that local priorities inform national regulation.

There is also scope to pilot a local 'water resilience zone', where bespoke regulatory flexibilities could be tested in exchange for robust monitoring and cross agency collaboration.

8. Conclusion and recommendations

The water crisis facing the East of England is not only a constraint but an opportunity. East Cambridgeshire can be at the forefront of a new approach to water management, one that is more local, more democratic, more resilient, and more integrated with planning and growth.

The stakes are high. Without a reliable, scalable, and sustainable water supply, the region cannot deliver the homes and jobs that local people need, flooding will increase, and water resilience will deteriorate. Water scarcity risks derailing the government's ambitions for the growth of Cambridge and the vision for the Oxford-Cambridge Arc as an engine of innovation and inclusion.

Conversely, by piloting new models of local water management and investment, the district can accelerate delivery and enhance sustainability. Mid-sized agricultural reservoirs linked to IDB-managed networks and local treatment works offer a viable, near term pathway.

Moreover, such infrastructure supports the diversification of the local economy and positions the Fens as a centre of climate adaptation and resilience.

East Cambridgeshire District Council already supports the development of agricultural reservoirs through its planning framework. Through the adoption of this report the council commits to building on existing practice and to supporting this approach for a local water system as part of its corporate strategy to address water scarcity and unlock growth. This includes alignment with Local Plan objectives.

Establishing a network of reservoirs to provide drinking water for Cambridgeshire will require collaboration across institutions, sectors, and levels of government. The next steps include deepening engagement with the Mayor of Cambridgeshire and Peterborough and the Combined Authority, the Cambridge Growth Company, the Environment Agency, regulators and water companies.

East Cambridgeshire is well-positioned to lead by example showing how local leadership, when empowered, can drive sustainable transformation. But this vision for a local water system will only happen with regional commitment and a shared willingness to rethink how water, as a vital resource, is planned and governed.

Recommendations for East Cambridgeshire District Council

The following are recommendations for East Cambridgeshire District Council:

- continue to promote sustainable water management (as per the council's Climate and Nature Strategy 2024 to 2028)
- support the development of agricultural reservoirs for the purpose of supplying drinking water to Cambridgeshire
- work with the Mayoral Combined Authority and Cambridge Growth Company to develop and fund next stage feasibility and business cases
- promote this model as a national pilot for adoption as part of national planning guidance

Recommendations for government

The following are recommendations for the government:

- pilot water market reform and regulatory innovation in East Cambridgeshire
- amend legislation to enable Internal Drainage Boards to lead on water storage and distribution
- expand the statutory role of local authorities in strategic water planning, to include regulators, utilities, and councils as equal partners
- introduce a duty on regulatory bodies (Ofwat, Drinking Water Inspectorate, Environmental Agency) to support a more agile and responsive approach to local water needs, including:
 - local off take contracts that enable seasonal abstraction with trading
 - stronger regional input into Price Reviews, outside the PR24 cycle
 - reform of Drinking Water Inspectorate rules for local treatment
 - new Appointments and Variations (NAV) for wholesale access to water networks
 - introduce a regulated market for bulk raw water trading
 - commission further evidence on the environmental and carbon benefits of this model

Recommendations for other partners

The following are recommendations for other partners:

- The Mayor of Cambridgeshire and Peterborough Combined Authority should convene a regional Water and Growth Board to coordinate strategy and create a framework for cross-sector partnerships to fund and deliver change
- Anglian Water, as the primary partner and beneficiary, should accelerate the Waterbeach treatment facility
- Ofwat should engage with local reservoir proposals through flexible licensing and investment models
- partners should create a Water Innovation Fund that can support locally led schemes

Cambridgeshire and Peterborough Combined Authority should work with other Local

Authorities in the region to adopt a similar approach

End of document.

From: [REDACTED]@eastcambs.gov.uk>

Sent: 29 September 2025 08:44

To: hendyp@parliament.uk

Cc: Cllr Anna Bailey <Anna.Bailey@eastcambs.gov.uk>; [REDACTED]

[REDACTED]@eastcambs.gov.uk>

Subject: Ely Area Capacity Enhancements

Good morning

Please see attachment from Cllr Anna Bailey, Leader, East Cambridgeshire District Council.

With kind regards.

[REDACTED]

PA to the Leader



East Cambridgeshire District Council

This matter is being dealt with by:

Cllr Anna Bailey

Lord Hendy of Richmond Hill
Chairman, Network Rail
1 Eversholt Street
London
NW1 2DN

Telephone: (01353) 665555

E-mail: anna.bailey@eastcambs.gov.uk

My Ref: SB/Hendy

Your ref

hendyp@parliament.uk

BY EMAIL

29 September 2025

Dear Lord Hendy,

Ely Area Capacity Enhancements

I write to you on behalf of East Cambridgeshire District Council regarding the long-overdue upgrade of Ely Junction and the wider Ely Area Capacity Enhancements scheme, which remains a critical infrastructure priority for East Cambridgeshire and for the national rail network.

As you will know, the junction remains a major bottleneck, constraining freight and passenger movement on one of the country's most strategically important rail corridors. The failure to include this scheme in the Government's latest round of transport investment announcements in June has caused significant concern among local stakeholders.

The case for investment is overwhelming:

- A benefit–cost ratio (BCR) of **4.89:1**, demonstrating exceptional value for money.
- Potential to remove **98,000 HGV journeys annually** from road networks.
- Enable **2,900 additional freight services per year** from the Port of Felixstowe.
- Reduce carbon emissions by **1.7 million tonnes of CO₂ over 60 years**.
- Save commuters and road users **5.6 million hours of traffic congestion annually**.

An addition to improving network capacity and resilience and operational performance, the scheme supports the delivery of a greener, more sustainable rail network, reinforcing Network Rail's Environmental Sustainability Strategy. It is consistent with the Anglia Route Strategic Plan and Freight Market Study objectives



East Cambridgeshire District Council

and directly supports the Integrated Rail Plan for the Midlands and the North and other long-term rail investment frameworks.

It has been **over two decades** since the first business case for this upgrade was put forward. The ongoing delays continue to impact economic growth, limit rail capacity, and frustrate efforts to decarbonise the UK transport system.

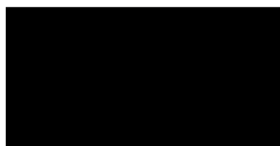
We are therefore writing to:

1. **Request Network Rail's renewed and public support** for the Ely Area Capacity Enhancements, including a clear statement of the project's importance to the national network.
2. **Ask how the Council and other local authorities can best assist** Network Rail in progressing this scheme, whether through advocacy, planning support, stakeholder engagement, or partnership working.
3. **Seek an update** on Network Rail's internal position regarding the scheme, including any current assessments or prioritisation that might support our collective efforts in securing government funding.

We are committed to playing an active role in advocating for and enabling this critical investment. Your leadership and the voice of Network Rail are vital in ensuring this scheme receives the attention and priority it so clearly deserves.

We would welcome the opportunity to meet or engage further to discuss how we can work together to bring about progress.

Yours sincerely,



Cllr Anna Bailey
Leader



East Cambridgeshire District Council

This matter is being dealt with by:

The Rt Hon Steve Reed MP
Secretary of State for Housing, Communities
and Local Government
2 Marsham Street
London
SW1P 4DF
United Kingdom

Cllr Anna Bailey

Telephone: (01353) 665555

E-mail: anna.bailey@eastcambs.gov.uk

My Ref: AB/SReed/CCane/MP

Your ref

BY EMAIL

steve.reed.mp@parliament.uk

2 October 2025

Dear Secretary of State,

Re: Proposed Changes to Council Tax Powers

I am writing to inform you that at its meeting on 18 September 2025, East Cambridgeshire District Council passed a motion opposing any moves by Government to devolve responsibility for setting Council Tax bands, rates, and property valuations to local authorities.

Council Tax already shows significant disparities across England. The average Band D bill is £2,171 but ranges from £829 in Westminster to £2,226 in Nottingham. In poorer areas, households pay a much greater share of their income on Council Tax — up to 10.3% in places like Blackpool and Teignbridge — compared to just 2% in Westminster. The poorest 10% of households spend 7% of their income on Council Tax, while the richest 10% spend just 1.2%. At the same time, arrears have reached a record £8.3 billion, with 4.4 million people behind on payments, a third of whom live below the poverty line.

Against this backdrop, we believe allowing councils to set their own bands and valuations would:

- Dismantle the nationally consistent framework that underpins fairness and accountability.
- Deepen regional inequalities, as wealthier areas would be able to raise more revenue while poorer areas would face increasing strain.
- Create confusion and reduce public trust, as neighbouring authorities could have widely differing systems and charges.
- Impose significant administrative and financial burdens on councils, diverting scarce resources away from frontline services.



East Cambridgeshire District Council

East Cambridgeshire District Council has frozen its share of Council Tax for twelve consecutive years, keeping Band D at £142.14. This stands in sharp contrast to neighbouring districts and illustrates how a decentralised system would exacerbate differences between councils, undermining fairness and transparency.

For these reasons, we are writing to you and our local member of parliament, Charlotte Cane MP, to reiterate our support for the retention of a nationally consistent framework for Council Tax.

We will also be engaging with the Local Government Association and other councils to promote alternative reforms that would improve fairness without fragmenting the system.

With our partners, we would urge the Government to reconsider these proposals and engage with us and our representatives to develop reforms that protect fairness, transparency and public confidence.

Yours sincerely,



Cllr Anna Bailey
Leader

Cc Charlotte Cane MP

From: [REDACTED]@eastcambs.gov.uk>
Sent: 03 October 2025 10:34
To: REED, Steve <steve.reed.mp@parliament.uk>
Cc: CANE, Charlotte (MP) <charlotte.cane.mp@parliament.uk>; Cllr Anna Bailey <Anna.Bailey@eastcambs.gov.uk>; Jude Antony <Jude.Antony@eastcambs.gov.uk>
Subject: PROPOSED CHANGES TO COUNCIL TAX POWERS

Good morning

Please see amended letter from Cllr Anna Bailey, Leader, East Cambridgeshire District Council.

With kind regards.

[REDACTED]

PA to Leader



East Cambridgeshire District Council

This matter is being dealt with by:

The Rt Hon Steve Reed MP
Secretary of State for Housing, Communities
and Local Government
2 Marsham Street
London
SW1P 4DF
United Kingdom

Cllr Anna Bailey

Telephone: (01353) 665555

E-mail: anna.bailey@eastcambs.gov.uk

My Ref: AB/SReed/CCane/MP

Your ref

BY EMAIL

steve.reed.mp@parliament.uk

2 October 2025

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Re: Proposed Changes to Council Tax Powers

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With our partners, we would urge the Government to reconsider these proposals and engage with us and our representatives to develop reforms that protect fairness, transparency and public confidence.

Yours sincerely,



Cllr Anna Bailey
Leader

Cc Charlotte Cane MP

From: [REDACTED]@eastcambs.gov.uk>

Sent: 01 December 2025 11:01

To: REED, Steve <steve.reed.mp@parliament.uk>

Cc: Cllr Anna Bailey <Anna.Bailey@eastcambs.gov.uk>

Subject: Submission of the Local Government Reorganisation Proposal by Cambridgeshire County Council

Good morning

Please see attached letter regarding the above from Anna Bailey, Leader, East Cambridgeshire District Council.

With kind regards.

[REDACTED]

PA to Leader



East Cambridgeshire District Council

This matter is being dealt with by:

The Rt. Hon. Steve Reed MP
Secretary of State for DEFRA
2 Marsham Street
London
SW1P 4DF

Email: steve.reed.mp@parliament.uk

Cllr Anna Bailey

Telephone: (01353) 665555

E-mail: anna.bailey@eastcambs.gov.uk

My Ref: AB/SReed

Your ref

1st December 2025

Dear Secretary of State,

Submission of the Local Government Reorganisation Proposal by Cambridgeshire County Council

I am writing to raise serious concerns regarding the process by which Cambridgeshire County Council voted to submit its preferred Local Government Reorganisation (LGR) proposal, known as Option A, to your Department. The decision was taken **without Councillors having been provided with, or having had the opportunity to review, the proposal** that accompanies the submission.

My own Council specifically requested that all the LGR proposals were available to members ahead of the decision making process to ensure they took this critical decision in full knowledge of all the facts, risks and assumptions.

As you will be aware, LGR represents a fundamental reconfiguration of local governance, service delivery and democratic accountability for nearly one million residents in Cambridgeshire and Peterborough. Decisions of this magnitude must rest on **clear, transparent and robust evidence**, in line with the expectations set out in your Department's LGR criteria.

However, in this case:

1. **The proposal was not made available to elected members before they were asked to vote.** Members had to rely on a brief officer overview¹. As a consequence, Councillors could not meaningfully scrutinise the full financial modelling, risk assessments, service implications or underlying assumptions.

¹ [Document.ashx](#), Page 30



East Cambridgeshire District Council

2. **The Council voted to approve submission of a proposal whose detailed content members had not seen.**

This represents a significant departure from established good-governance standards as set out in the CIPFA/IFAC “Delivering Good Governance in Local Government” Framework, which requires informed decision-making, openness, and accessible evidence.

In addition, I must highlight concerns regarding the way in which the proposal was handled with external partners and the wider public. Several key stakeholders were invited to endorse Option A **without being provided with the proposal**, and therefore without any meaningful opportunity to scrutinise the evidence, understand service and other impacts, or evaluate risks.

Specifically, the endorsements from the NHS organisations contained in the Option A proposal, (as well as other endorsements), were secured **prior to them having seen the Option A proposal, or any other proposal**, and cannot therefore have been taken in possession of all the facts. This is particularly concerning in relation to statutory consultees, meaning they are also pre-determined ahead of statutory consultation. How can the Government be assured of meaningful consultation in Cambridgeshire and Peterborough?

The County Council did not publish the proposal for residents, parish councils, stakeholders or partner organisations until just one day before the submission deadline. Such late publication prevented the public and local institutions from offering informed comment, despite your Department’s clear expectation that LGR proposals must demonstrate meaningful engagement, transparency and local consent.

This late disclosure raises very significant questions about the robustness and legitimacy of the endorsements the County Council claims to have secured.

Further, **the County Council did not allow other Councils in Cambridgeshire and Peterborough to collaborate on its proposal**, (beyond the common data set agreed by all seven Councils), despite best efforts by my own Council to do so. This sits in stark contrast to Option B, which had collaboration from six of the seven Councils.

Such an approach risks undermining both the democratic legitimacy of the proposal and public confidence in the reorganisation process. It is difficult to reconcile the decision-making process used by the County Council with your Department’s expectation that LGR proposals demonstrate:

- meaningful local engagement,
- clear evidence of collaboration,
- robust assessment of options, and
- open and accountable decision-making.



East Cambridgeshire District Council

Taken together, these issues raise serious doubts as to whether the proposal satisfies the standards of transparency, accountability and evidence-based decision-making your Department requires. They also risk undermining public confidence in the reorganisation process and the democratic legitimacy of the submission itself.

In light of the above, I respectfully request that the Department gives careful consideration to:

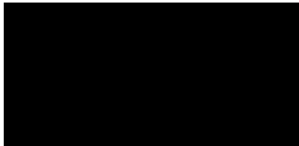
- whether the governance process undertaken by Cambridgeshire County Council satisfies the expectations for openness, due process and informed decision-making, and
- whether a submission made under these circumstances can reasonably be considered compliant with the standards your Department has set for LGR proposals.

I would welcome clarification on how the Department intends to assess the governance processes underpinning submissions, and whether the approach taken in this case meets the criteria for a valid and credible proposal.

Thank you for your attention to this matter. I would be happy to provide any additional information or discuss these concerns further and I look forward to hearing from you.

Yours sincerely,

Yours sincerely,



Cllr Anna Bailey
Leader

From: Maggie Camp
Sent: 16 June 2026 13:53
To: 'Charlotte Cane MP' <charlotte.cane.mp@parliament.uk>
Subject: RE: Dust Migration in Burwell (Case Ref: CC16717)

Dear Briony,

Firstly, I apologise for the delay in responding to you, but I have had to liaise with colleagues from the planning enforcement and environmental services teams. I set out below the responses from each team:

Planning Enforcement

A report concerning dust was made to the council on 28 April and was fully investigated with regards to the planning laws and powers. It was concluded that there was no breach and the developers were following the requirements of the build permission, particularly in relation to the Construction Environmental Management Plan (CEMP). No further planning enforcement action was required, and the case was closed on 30 April.

Environmental Services

The team are investigating this as a possible statutory nuisance which means the matter must be impacting the use and enjoyment of property (or be prejudicial to health). What this assessment cannot do is consider dust on cars/windows as a statutory nuisance as this is damage to property and would be classed as a civil matter.

The team have sent out diary sheets to those who have contacted them and once completed and returned, the team will make visits to the complainant's property, and an assessment will then be made to whether a statutory nuisance is present. If it is established that a statutory nuisance is present, then the team will consider enforcement action.

I trust this clarifies the current position from the Council's perspective, but if you require any further information, please do not hesitate to contact me.

Kind regards Maggie



East Cambridgeshire
District Council

Maggie Camp

Director Legal & Monitoring Officer

Legal Services



01353 665555



www.eastcambs.gov.uk



eastcambsgov



@EastCambs

East Cambridgeshire District Council, The Grange, Nutholt Lane, Ely, Cambridgeshire CB9 9AT

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Please consider the environment before printing this email.

From: Charlotte Cane MP <charlotte.cane.mp@parliament.uk>

Sent: 01 May 2026 13:33

To: Maggie Camp <Maggie.Camp@eastcambs.gov.uk>

Subject: Dust Migration in Burwell (Case Ref: CC16717)

Dear Maggie, Apologies if you are the incorrect person to contact regarding this matter. Charlotte has received correspondence from a constituent who lives in close proximity to the Newmarket Road development in Burwell. The constituent is experiencin

External sender <charlotte.cane.mp@parliament.uk>

Make sure you trust this sender before taking any actions.

Dear Maggie,

Apologies if you are the incorrect person to contact regarding this matter. Charlotte has received correspondence from a constituent who lives in close proximity to the Newmarket Road development in Burwell. The constituent is experiencing significant levels of dust migration from the construction site, with dust settling on vehicles and in their home.

The constituent has provided photos and videos demonstrating the extent of the dust issue, which I would be happy to forward should this be helpful.

They report that there appears to be no dust control in place on site, in direct opposition to clear Health and Safety Executive (HSE) guidance. As such, I would be grateful for an officer to urgently attend the site to assess whether appropriate dust control measures are in place and whether the developer is complying with HSE guidance and any approved RAMS or CEMP.

The current situation of significant dust migration into nearby homes, vehicles, and living spaces, is clearly unacceptable and presents a potential health risk.

All the best,
Briony

Briony Tilsley (she/her)

Administrative Manager for Charlotte Cane MP

Member of Parliament for Ely and East Cambridgeshire

Charlotte Cane MP will use any personal data you provide in accordance with her privacy policy, which is available to view [here](#).

[Sign up to Charlotte's newsletter](#) to keep up to date with her work for Ely & East Cambridgeshire.

From: [REDACTED]@eastcambs.gov.uk>
Sent: 25 June 2026 06:08
To: Cllr Anna Bailey <Anna.Bailey@eastcambs.gov.uk>
Subject: FW: Bank Closure Motion (Case Ref: CC17896)

Good morning

Please see attached letter.

Regards.

[REDACTED]

From: Charlotte Cane MP <charlotte.cane.mp@parliament.uk>
Sent: 23 June 2026 16:40
To: [REDACTED]@eastcambs.gov.uk>
Subject: Re: Bank Closure Motion (Case Ref: CC17896)

Dear [REDACTED] Please find attached a response from Charlotte Cane. All the best, Briony Briony Tilsley (she/her) Administrative Manager for Charlotte Cane MP Member of Parliament for Ely and East Cambridgeshire Charlotte Cane MP will u

External sender <charlotte.cane.mp@parliament.uk>
Make sure you trust this sender before taking any actions.

Dear [REDACTED]

Please find attached a response from Charlotte Cane.

All the best,
Briony

Briony Tilsley (she/her)
Administrative Manager for Charlotte Cane MP
Member of Parliament for Ely and East Cambridgeshire

Charlotte Cane MP will use any personal data you provide in accordance with her privacy policy, which is available to view [here](#).



Charlotte Cane MP
Ely and East Cambridgeshire
House of Commons, London SW1A 0AA
Email: charlotte.cane.mp@parliament.uk

Cllr Anna Bailey
Leader, East Cambridgeshire District Council
The Grange
Nutholt Lane
Ely
CB7 4EE

23 June 2026

Our Ref: CC17896

Dear Councillor Bailey,

Thank you for your letter on 29 May regarding high street banking closures and financial inclusion in East Cambridgeshire.

I am committed to ensuring that financial services remain accessible to residents across Ely and East Cambridgeshire and have been actively pursuing this matter since my election.

In June 2025 I met with the Local Director for NatWest to discuss the impact the closure will have on the local community. I also wrote to Santander to raise similar concerns regarding access to cash and service quality.

However, in August I was invited to reopen the newly refurbished Nationwide branch in Ely. It is fantastic to see Nationwide, at least, reaffirming its commitment to keeping branches open – not just in big cities but in communities like Ely where banks are a vital part of daily life.

Moreover, I have been in contact with LINK who were able to provide constituency specific data regarding access to cash. Their analysis illustrated that in 2025 81.6% population lived within 1 mile of access to cash, and 99.1% were within 3 miles. This represents only a 2% reduction in those within one mile since 2019, and no change within three miles, suggesting that access to cash has remained relatively stable locally. I recognise that many residents rely on local Post Offices to access cash, which is why I am equally concerned about the need to protect and sustain these vital community services.

Therefore, whilst maintaining access to cash remains vital, my primary concern at this time is the loss of essential in-person banking services that cannot be replicated digitally, or at the post office. For example, a constituent recently contacted me regarding an issue with a cheque signature that could only be resolved at a branch. The nearest available branch was in Bury St Edmunds, and they expressed concern about how increasingly difficult travel would become as they get older. I have also experienced first-hand the need to visit a branch when dealing with probate following a bereavement.

Moreover, in-person banking services remain vital to the smooth running of many businesses' day-to-day operations. The ability to securely deposit cash takings, alongside access to face-

to-face services such as obtaining change, verifying high-value transactions, resolving account issues, and receiving tailored financial advice, is essential. These services provide the efficiency, reliability, and reassurance that many businesses depend on, particularly those handling regular cash transactions or requiring direct, responsive support.

Nationally, the government must do more to protect access to banking services. People living in rural communities across Ely and East Cambridgeshire often have to travel miles to access banking services. This is particularly difficult for those without transport, the elderly or disabled.

The development of Community Banking Hubs is a key alternative for areas that have lost access to bank and building society branches. I, alongside my Liberal Democrat colleagues, are supportive of these developments, and recognise that banking services are crucial for rural constituencies in particular. Back in November, I signed [this motion](#) which highlighted the urgent need for access to banking hubs in areas where banking branches have been lost.

My Liberal Democrat colleagues and I welcomed the Financial Inclusion Strategy 2025 (see [here](#)) and the Government's commitment with the sector to open 350 banking hubs by the end of this Parliament. However, we are clear that the Government must both ensure that this target is delivered in full, as well as expand that target if necessary. We will continue holding them to account to ensure that these commitments translate into real, accessible services on the ground, rather than falling short of what communities have been promised.

Finally, as you are aware, I also serve as a District Councillor and attend all Full Council meetings where motions such as this are debated. With that in mind, and in the interest of efficiency, I would be very willing to arrange regular meetings following Council sessions to hear your concerns directly.

Thank you once again for taking the time to write and for your engagement on this important issue.

Yours sincerely,



Charlotte Cane MP

Member of Parliament for Ely and East Cambridgeshire

Rt Hon Steve Reed MP
Secretary of State for Housing,
Communities and Local Government
Ministry of Housing, Communities and
Local Government
2 Marsham Street
London
SW1P 4DF

Please ask for:
email: [redacted]@localgoveasteng.gov.uk
Date: 25 June 2026

Dear Secretary of State

Proposed "Forest City 1" Development – Suffolk and Cambridgeshire

We are writing collectively as leaders of local authorities across Suffolk and Cambridgeshire to express our strong concerns regarding the proposed "Forest City 1" development spanning West Suffolk, South and East Cambridgeshire.

While we recognise and support the Government's ambition to deliver new homes at scale, we are clear that developments of this magnitude must be plan-led, evidence-based, and developed in full partnership with local authorities and communities. In this instance, we do not believe those tests have been met.

We would like to record our opposition to this proposed development and request that the Government does **not** support its progress in any way, including confirmation of rejection from the New Towns Taskforce.

No clarity on process

A proposal of this size would fundamentally reshape regional spatial strategies and could not proceed without Combined Authority involvement and strategic alignment, none of which currently exists.

We understand that the promoters of Forest City have been lobbying the Government and we are therefore requesting clarity on whether the Government is giving any consideration to this proposal. If so, please can you provide the amount of consideration and what the next steps would involve together with any programme or timescales.

We are also seeking your advice and guidance on whether this would impact councils in progressing a Local Plan and Strategic Planning, noting that the Forest City proposal is not a local plan or even regional planning matter and would be government led.

It is important that we provide clear and consistent communications to our communities, enabling us to have a clear understanding of the process and clarity on Government's current thinking and position. This will enable us to inform our residents and progress with strategic and local plan making with certainty.

Absence of a clear evidence base for need

We have not seen any robust or transparent evidence demonstrating the national-level need for a development of this scale in this specific geography. Local plans across the region already identify significant housing growth, informed by assessed need. The case for an additional new settlement of this magnitude has not been made.

Conflict with existing planned growth

Cambridgeshire is already accommodating substantial housing and employment growth, including through the establishment of a development corporation to deliver planned new communities. Introducing a further large-scale development in close proximity risks undermining the delivery, infrastructure planning, and funding assumptions of these existing commitments and is not required.

Uncertainty around funding

No confirmed funding sources have been identified for the infrastructure required to support a development of this size, including transport, utilities, health, and education provision. Provisional funding sources, such as with land value capture, are unproven at this scale. Proceeding without a clear and deliverable funding strategy would pose significant risks to both planned new and existing communities.

Transport constraints

The current proposed cost of transportation infrastructure, approximately £8.6-£16bn, is not feasible under current plans. There is no credible strategy for how development will affect existing transportation in the area, in addition to lack of credible funding sources.

Impact on key economic sectors

We note serious concerns raised by representatives of the horse racing industry, given that the proposed development area intersects with land critical to that sector. This is a nationally significant economic and cultural industry whose needs must be carefully considered.

Loss of high-quality agricultural land

The proposal would also result in the loss of significant areas of Grade 2 agricultural land. At a time of increasing focus on food security and sustainable land use, this raises substantial concerns.

Absence of a masterplan

There is currently no comprehensive masterplan in place to demonstrate how such a large-scale development would be designed, phased, and integrated with its surroundings. This lack of clarity further undermines confidence in the proposal.

Water resource pressures

Water scarcity and wastewater capacity are already areas of significant constraint across much of the East of England. A development of this scale would place additional strain on an already stressed system, and no credible plan has been presented to address this. In addition, the feasibility of an entirely new reservoir, at the cost of £1.7-£3.2bn is untested, with unclear plans for funding.

New Towns Taskforce context

We understand that an application submitted to the Government's New Towns Taskforce with regards to the Forest City proposal has now been rejected. We welcome this development and would appreciate confirmation of the Government's position on this. It is our belief that any progression of this development via the New Towns Taskforce would significantly undermine confidence in the government's stewardship of a growth process that started with a commission of experts making a series of recommendations based upon a national geography. Piecemeal decision making on matters of national strategic growth need, as a minimum, to be driven by robust and transparent processes including through the forthcoming Spatial Development Strategies.

In summary, we believe this proposal is premature, insufficiently evidenced, and risks undermining existing, carefully planned and managed growth across our region and the Country. We urge you to give full weight to the views of local authorities and to ensure that any proposals for large-scale development are genuinely plan-led, locally supported, and infrastructure-led.

We would welcome the opportunity to engage further with you and your officials on this matter.

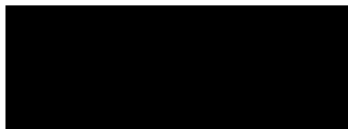
Yours sincerely

A large black rectangular redaction box covering the signature area.

Cllr Lucy Nethsingha, Leader of Cambridgeshire County Council

Cllr Anna Bailey, Leader of East Cambridgeshire District Council

Cllr Bridget Smith, Leader of South Cambridgeshire District Council

A black rectangular redaction box covering the signature area.

Cllr Cliff Waterman, Leader of West Suffolk Council



Charlotte Cane MP
Ely and East Cambridgeshire
House of Commons, London SW1A 0AA
Email: charlotte.cane.mp@parliament.uk

Emma Grima
Chief Executive
East Cambridgeshire District Council
The Grange
Nutholt Lane
Ely, Cambridgeshire
CB7 4EE

25 June 2026

Dear Emma,

I am writing to you on the matter of Sunnica Energy Farm and their plans for a Battery Energy Storage System (BESS).

As you are already aware, significant local concern has been raised throughout the planning process for the Sunnica solar farm. While concerns have been raised on a number of issues, residents are particularly concerned about the fire safety of the planned BESS site and the consequences for local residents and the environment.

While the likelihood of fire at the BESS site should be relatively low, if a fire does occur it poses very significant risk. Aside from potentially dangerous contamination of chemicals into the air and water, BESS fires can last for days on end and can require significant volumes of water to suppress.

Sunnica's Battery Fire Safety Management Plan (BFSMP) has not yet been published, meaning that full scrutiny cannot yet be afforded. However, it is my understanding that the BFSMP will eventually be submitted for approval, and that the BFSMP will then be shared with consultees including the Environment Agency and Cambridgeshire Fire and Rescue.

The Environment Agency tell me that, while they are working hard with their available resources to improve their understanding of BESS sites, they are concerned about the short 56-day window in which to scrutinise the BFSMP. They anticipate that it will require detailed work, including extensive discussion with Cambridgeshire Fire and Rescue.

Therefore, I would like your assurance that East Cambridgeshire District Council is ready to act swiftly and efficiently, following all due process, to ensure the plans are shared with the Environment Agency and Cambridgeshire Fire and Rescue as soon as the BFSMP is received. This will ensure that as much of the 56-day window as possible is dedicated to fully examining the detail of Sunnica's plans.

As I am sure you will appreciate, this is an issue of serious concerns to my constituents, many of whom are facing the prospect of living in the vicinity of a very large BESS site. It is also an issue of profound importance to our natural environment, the safeguarding of which is a responsibility of all of us in a position of authority.

I look forward to hearing from you soon.

Yours sincerely,



Charlotte Cane MP

Member of Parliament for Ely and East Cambridgeshire

Emma Grima

From: Emma Grima
Sent: 28 June 2026 19:49
To: 'Charlotte Cane MP'
Cc: [REDACTED]
Subject: RE: (Case Ref: CC11665) Battery Energy Storage Systems at Sunnica Energy Farm
Attachments: 2026-06-25- ECDC_BESS_BFSMP.pdf

Dear Charlotte Cane MP,

I confirm receipt of your letter dated 25 June 2026.

I have passed this to [REDACTED] Strategic Planning & Development Control Manager, who will respond directly

Kind Regards

Emma Grima
Chief Executive

From: Charlotte Cane MP <charlotte.cane.mp@parliament.uk>
Sent: 25 June 2026 11:12
To: Emma Grima <Emma.Grima@eastcambs.gov.uk>
Subject: (Case Ref: CC11665) Battery Energy Storage Systems at Sunnica Energy Farm

External sender <charlotte.cane.mp@parliament.uk>
Make sure you trust this sender before taking any actions.

Dear Emma,

Please find attached a letter from Charlotte Cane MP, on the subject of Sunnica Solar Farm's proposals for Battery Energy Storage Systems (BESS).

I look forward to hearing from you.

Best wishes,
Joe

Joe Langham (he/him)
Support Officer for Charlotte Cane MP
Member of Parliament for Ely and East Cambridgeshire

Charlotte Cane MP will use any personal data you provide in accordance with her privacy policy, which is available to view [here](#).

[Sign up to her newsletter](#) to keep up to date with her work for Ely & East Cambridgeshire.



Charlotte Cane MP
Ely and East Cambridgeshire
House of Commons, London SW1A 0AA
Email: charlotte.cane.mp@parliament.uk

Emma Grima
Chief Executive
East Cambridgeshire District Council
The Grange
Ely
CB7 4EE

Our ref: CC13416

19 February 2026

Dear Emma,

Re: Military compensation payments and means-tested benefits in East Cambridgeshire

I am writing to express my support for the Royal British Legion's *Credit Their Service* campaign. I have been contacted by the Royal British Legion to highlight that military compensation payments — whether from the Armed Forces Compensation Scheme, the War Pension Scheme, Service Invaliding Pensions (SIPs), or Service Attributable Pensions (SAPs) — are still treated inconsistently in means-tested benefits by East Cambridgeshire District Council. I understand these payments are awarded in recognition of injury, illness, or loss sustained through service. They are not ordinary income, and they should not be treated as such.

Current data indicates that while East Cambridgeshire District Council rightly disregards Armed Forces Compensation Scheme and War Pension Scheme payments in assessments for Council Tax Support, Housing Benefit, and Disabled Facilities Grants, this approach is not applied across the board. SIPs and SAPs are generally still counted as income, and no form of military compensation is excluded from the means-test for Discretionary Housing Payments. As a result, some veterans and their families are left at a disadvantage precisely when they seek support with housing costs or essential adaptations.

This inconsistency is not unique to East Cambridgeshire, and the Royal British Legion's national mapping shows a patchwork of approaches across England. However, aligning all local benefits assessments so that every form of military compensation is fully disregarded would be a simple, fair, and deeply meaningful step in honouring the service of those who have sacrificed for our country.

I look forward to your response.

Yours sincerely,

Emma Grima

From: Emma Grima
Sent: 20 February 2026 10:41
To: 'Charlotte Cane MP'
Subject: RE: Military Compensation Payments and Means-Tested Benefits in East Cambridgeshire (Case Ref: CC13416)

Dear Charlotte,

Thank you for your email. I have raised this internally and with ARP and will respond once I have the relevant information.

Kind Regards

Emma

From: Charlotte Cane MP <charlotte.cane.mp@parliament.uk>
Sent: 19 February 2026 09:14
To: Emma Grima <Emma.Grima@eastcambs.gov.uk>
Subject: Military Compensation Payments and Means-Tested Benefits in East Cambridgeshire (Case Ref: CC13416)

Warning: Unusual sender <charlotte.cane.mp@parliament.uk>

You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

Dear Emma,

See attached a letter regarding military compensation payments and means-tested benefits in East Cambridgeshire.

I look forward to your response on this matter.

Kind regards,
Charlotte

Charlotte Cane MP (she/her)
Member of Parliament for Ely and East Cambridgeshire

I will use any personal data you provide in accordance with my privacy policy, which is available to view [here](#).

[Sign up to my newsletter](#) to keep up to date with my work for Ely & East Cambridgeshire.

Emma Grima

From: Emma Grima
Sent: 26 May 2026 09:17
To: Charlotte Cane MP
Cc: [REDACTED]
Subject: RE: Military Compensation Payments and Means-Tested Benefits in East Cambridgeshire (Case Ref: CC13416)
Attachments: CCMP- Military Compensation.pdf

Dear Charlotte Cane MP,

Please find attached my response to your letter.

Kind Regards

Emma Grima
Chief Executive

From: Charlotte Cane MP <charlotte.cane.mp@parliament.uk>
Sent: 19 February 2026 09:14
To: Emma Grima <Emma.Grima@eastcambs.gov.uk>
Subject: Military Compensation Payments and Means-Tested Benefits in East Cambridgeshire (Case Ref: CC13416)

Warning: Unusual sender <charlotte.cane.mp@parliament.uk>

You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

Dear Emma,

See attached a letter regarding military compensation payments and means-tested benefits in East Cambridgeshire.

I look forward to your response on this matter.

Kind regards,
Charlotte

Charlotte Cane MP (she/her)
Member of Parliament for Ely and East Cambridgeshire

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[Sign up to my newsletter](#) to keep up to date with my work for Ely & East Cambridgeshire.



Charlotte Cane MP

By email only

This matter is being dealt with by

Emma Grima
Emma.grima@eastcambs.gov.uk

Phone	01353 665555
My reference	EG/MP/MilComp
Date	26 May 2026

Dear Charlotte Cane MP

Thank you for your letter dated 19 February 2026. I apologise for the delayed response; I have been awaiting a briefing from Anglia Revenues Partnership and our internal team that makes decisions on disabled facilities grants.

In relation to disabled facilities grants

- Armed Forces Compensation scheme is not counted as income
- War Pension Scheme is not counted as income.
- Service Attributable Pension (SAPs) is not counted as income
- Service Invaliding Pension (SIPs) is not counted as income where the person is not in receipt of Constant Attendance Allowance.

ECDC's uses Ferrett software system that is in use in over 60% of local authorities in England and Wales for housing grant legislation and financial assessments. The software is approved by Government and provides accurate assessments and is updated to reflect current legislative changes as they are introduced.

We are aware of the need to support those who have given service and recognise the need for their financial position to be treated as such.

In relation to Housing Benefit & Local Council Tax Reduction, an Armed Forces Compensation payment or War Disablement Pension, would be disregarded in full for East Cambridgeshire District Council; based on the 'local disregard'. Service Invaliding Pensions (SIPs) & Service Attributable Pensions (SAPs) are not currently disregarded for Housing Benefit & Local Council Tax Reduction.

This percentage could vary in other parts of the country. If a customer felt that their income was not being treated correctly, we encourage customers to appeal any decision and this would be investigated.

Although there is nothing in the Department of Work & Pensions guidance for Discretionary Housing Payments (DHP) which indicate that Armed Forces payments should be disregarded we would look at each case independently. We reference to the way in which Disability Living Allowance or Personal Independence Payment is treated in DHP calculations, which I quote from the guidance...

'Places an obligation on LAs to consider each DHP application on a case-by-case basis having regard to each component of the benefits in payment, the purpose of those disability related benefits and whether the money from those benefits has been committed to other liabilities associated with disability.'

Although there are no appeal rights in relation to DHPs, customers can request a review of any decision in writing and provide further information if they feel that their personal circumstances have not been considered.

I hope this information is useful to you

Yours sincerely



Emma Grima

Chief Executive



Charlotte Cane MP

Ely and East Cambridgeshire
House of Commons, London SW1A 0AA
Email: charlotte.cane.mp@parliament.uk

Emma Grima
Chief Executive
East Cambridgeshire District Council
[sent via email]

19 May 2026

Our Ref: CC15772

Dear Emma,

Re: Support for the “Save The Fountain Pub” Campaign

I am writing to express my support for the “Save The Fountain Pub” campaign and to urge the Council to give careful consideration to the community’s concerns regarding the future of this valued local asset.

I have been contacted by a number of residents who have voiced their support for the campaign. Their concerns highlight not only the cultural and historical value of The Fountain, but also the clear demand for its continued use as a public house and community venue. This strength of feeling should be given significant weight in any decision-making process.

Nationally, we have seen an ongoing decline in pubs, and with each closure, communities lose an important part of their identity. Protecting valued local amenities where there is demonstrable community support aligns with broader objectives around wellbeing, local engagement, and the sustainability of our towns and villages.

I appreciate the need to balance a range of considerations in planning decisions, but I hope the Council will give full weight to the community’s concerns.

Yours sincerely,

Charlotte Cane MP

Member of Parliament for Ely and East Cambridgeshire

Emma Grima

From: Emma Grima
Sent: 19 May 2026 09:59
To: Charlotte Cane MP
Subject: RE: Support for the "Save The Fountain Pub" Campaign (Case Ref: CC15772)

Dear Charlotte,

I can confirm receipt of your letter which I have sent to the Planning Department.

Kind Regards

Emma

From: Charlotte Cane MP <charlotte.cane.mp@parliament.uk>
Sent: 19 May 2026 09:40
To: Emma Grima <Emma.Grima@eastcambs.gov.uk>
Subject: Support for the "Save The Fountain Pub" Campaign (Case Ref: CC15772)

External sender <charlotte.cane.mp@parliament.uk>

Make sure you trust this sender before taking any actions.

Dear Emma,

Please see attached a letter outlining my support for the "Save The Fountain Pub" campaign.

Kind regards,
Charlotte

Charlotte Cane MP (she/her)
Member of Parliament for Ely and East Cambridgeshire

I will use any personal data you provide in accordance with my privacy policy, which is available to view [here](#).

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