

# Cabinet



<b>Title</b>	<b>Agenda</b>																										
<b>Date</b>	<b>Tuesday 7 December 2021</b>																										
<b>Time</b>	<b>6.00 pm</b>																										
<b>Venue</b>	<b>Conference Chamber</b> <b>West Suffolk House</b> Western Way Bury St Edmunds <b>**For the health and safety for all persons present and in order to reduce the risk of the spread of coronavirus, appropriate mitigation measures will be applied**</b>																										
<b>Membership</b>	<table border="0"> <tr> <td><b>Leader</b></td><td>John Griffiths</td></tr> <tr> <td><b>Deputy Leader</b></td><td>Sara Mildmay-White</td></tr> <tr> <td><b>Councillor</b></td><td><b>Portfolio</b></td></tr> <tr> <td>Sarah Broughton</td><td>Resources and Property</td></tr> <tr> <td>Carol Bull</td><td>Governance</td></tr> <tr> <td>Andy Drummond</td><td>Regulatory and Environment</td></tr> <tr> <td>Robert Everitt</td><td>Families and Communities</td></tr> <tr> <td>Susan Glossop</td><td>Growth</td></tr> <tr> <td>John Griffiths</td><td>Leader</td></tr> <tr> <td>Sara Mildmay-White</td><td>Housing and Strategic Health</td></tr> <tr> <td>Joanna Rayner</td><td>Leisure, Culture and Community Hubs</td></tr> <tr> <td>David Roach</td><td>Planning</td></tr> <tr> <td>Peter Stevens</td><td>Operations</td></tr> </table>	<b>Leader</b>	John Griffiths	<b>Deputy Leader</b>	Sara Mildmay-White	<b>Councillor</b>	<b>Portfolio</b>	Sarah Broughton	Resources and Property	Carol Bull	Governance	Andy Drummond	Regulatory and Environment	Robert Everitt	Families and Communities	Susan Glossop	Growth	John Griffiths	Leader	Sara Mildmay-White	Housing and Strategic Health	Joanna Rayner	Leisure, Culture and Community Hubs	David Roach	Planning	Peter Stevens	Operations
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<b>Interests – declaration and restriction on participation</b>	Members are reminded of their responsibility to declare any disclosable pecuniary interest not entered in the Authority's register or local non pecuniary interest which they have in any item of business on the agenda (subject to the exception for sensitive information) and to leave the meeting prior to discussion and voting on an item in which they have a disclosable pecuniary interest.																										
<b>Quorum</b>	Four Members																										
<b>Committee administrator</b>	<b>Claire Skoyles</b> Democratic Services Officer <b>Telephone</b> 01284 757176 / 07776 254986 <b>Email</b> <a href="mailto:claire.skoyles@westsuffolk.gov.uk">claire.skoyles@westsuffolk.gov.uk</a>																										

## Public information



<b>Venue</b>	Conference Chamber, West Suffolk House, Western Way, Bury St Edmunds IP33 3YU
<b>Contact information</b>	Telephone: 01284 757176 / 07776 254986 Email: <a href="mailto:democratic.services@westsuffolk.gov.uk">democratic.services@westsuffolk.gov.uk</a> Website: <a href="http://www.westsuffolk.gov.uk">www.westsuffolk.gov.uk</a>
<b>Access to agenda and reports before the meeting</b>	The agenda and reports will be available to view at least five clear days before the meeting on our website.
<b>Attendance at meetings</b>	This meeting is being held in person in order to comply with the Local Government Act 1972. Measures will be applied to ensure the health and safety for all persons present is maintained. We may be required to restrict the number of members of the public able to attend in accordance with the room capacity. If you consider it is necessary for you to attend, please inform Democratic Services in advance of the meeting so they can endeavour to accommodate you and advise you of the necessary health and safety precautions.
<b>Public participation</b>	<p>Members of the public who live or work in the district are invited to put one question or statement of not more than three minutes duration relating to items to be discussed in Part 1 of the agenda only. If a question is asked and answered within three minutes, the person who asked the question may ask a supplementary question that arises from the reply.</p> <p>The Constitution allows that a person who wishes to speak must register at least 15 minutes before the time the meeting is scheduled to start. However, due to the need to comply with current coronavirus regulations and guidance, necessary health and safety precautions taken will apply to members of the public registered to speak. <b>We would therefore strongly urge anyone who wishes to register to speak to notify Democratic Services by 9am on the day of the meeting so that advice can be given on the arrangements in place.</b></p> <p>There is an overall time limit of 15 minutes for public speaking, which may be extended at the Chair's discretion.</p>
<b>Accessibility</b>	If you have any difficulties in accessing the meeting, the agenda and accompanying reports, including for reasons of a disability or a protected characteristic, please contact Democratic Services at the earliest opportunity using the contact details provided above in order that we may assist you.
<b>Recording of meetings</b>	The Council may record this meeting and permits members of the public and media to record or broadcast it as well (when the media and public are not lawfully excluded).

	Any member of the public who attends a meeting and objects to being filmed should advise the Committee Administrator who will instruct that they are not included in the filming.
<b>Personal information</b>	Any personal information processed by West Suffolk Council arising from a request to speak at a public meeting under the Localism Act 2011, will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website: <a href="https://www.westsuffolk.gov.uk/Council/Data_and_information/howweuseinformation.cfm">https://www.westsuffolk.gov.uk/Council/Data_and_information/howweuseinformation.cfm</a> or call Customer Services: 01284 763233 and ask to speak to the Information Governance Officer.

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# Agenda

## Procedural matters

**1. Apologies for absence**

**2. Minutes**

**1 - 10**

To confirm the minutes of the meeting held on 9 November 2021 (copy attached).

**3. Declarations of interest**

Members are reminded of their responsibility to declare any pecuniary or local non pecuniary interest which they have in any item of business on the agenda, **no later than when that item is reached** and, when appropriate, to leave the meeting prior to discussion and voting on the item.

## Part 1 - public

**4. Open forum**

At each Cabinet meeting, up to 15 minutes shall be allocated for questions or statements from and discussion with, non-Cabinet members. Members wishing to speak during this session are encouraged to give notice in advance. Who speaks and for how long will be at the complete discretion of the person presiding.

**5. Public participation**

Members of the public who live or work in the district are invited to put one question or statement of not more than three minutes duration relating to items to be discussed in Part 1 of the agenda only. If a question is asked and answered within three minutes, the person who asked the question may ask a supplementary question that arises from the reply.

A person who wishes to speak must register at least 15 minutes before the time the meeting is scheduled to start. This can be done online by sending the request to [democratic.services@westsuffolk.gov.uk](mailto:democratic.services@westsuffolk.gov.uk) or telephoning 01284 757176 or in person by telling the Committee Administrator present at the meeting. Due to applying coronavirus health and safety measures, precautions taken will apply to members of the public in attendance and registered to speak, and therefore, **would urge anyone who wishes to register to speak to notify Democratic Services by 9am on the day of the meeting so that advice can be given on the arrangements in place.**

There is an overall time limit of 15 minutes for public speaking, which may be extended at the Chair's discretion.

**6. Report of the Overview and Scrutiny Committee: 11 November 2021 11 - 16**

Report number: **CAB/WS/21/053**

Chair of the Committee: Councillor Ian Shipp

Lead officer: Christine Brain

**7. Report of the Performance and Audit Scrutiny Committee: 18 November 2021 17 - 24**

Report number: **CAB/WS/21/054**

Chair of the Committee: Councillor Ian Houlder

Portfolio holder: Councillor Sarah Broughton

Lead officer: Christine Brain

**Non key decisions**

**8. Recommendation of the Performance and Audit Scrutiny Committee: 18 November 2021 - Arrangements for Appointment of External Auditors 25 - 28**

Report number: **CAB/WS/21/055**

Portfolio holder: Councillor Sarah Broughton

Chair of the Committee: Councillor Ian Houlder

Lead officer: Rachael Mann

**9. Recommendations of the Performance and Audit Scrutiny Committee: 18 November 2021 - Delivering a Sustainable Medium-Term Budget 29 - 36**

Report number: **CAB/WS/21/056**

Portfolio holder: Councillor Sarah Broughton

Chair of the Committee: Councillor Ian Houlder

Lead officer: Rachael Mann

**10. Recommendations of the Performance and Audit Scrutiny Committee: 18 November 2021 - Treasury Management Report (September 2021) 37 - 40**

Report number: **CAB/WS/21/057**

Portfolio holder: Councillor Sarah Broughton

Chair of the Committee: Councillor Ian Houlder

Lead officer: Rachael Mann

	<b>Pages</b>
<b>11. West Suffolk Local Council Tax Reduction Scheme (LCTRS): 2022 to 2023</b> Report number: <b>CAB/WS/21/058</b> Portfolio holder: Councillor Sarah Broughton Lead officer: Rachael Mann	<b>41 - 64</b>
<b>12. Housing Priorities: Progress Update</b> Report number: <b>CAB/WS/21/059</b> Portfolio holders: Councillor Sara Mildmay-White Councillor Andy Drummond Councillor Susan Glossop Councillor David Roach Lead officers: Julie Baird Jen Eves Davina Howes	<b>65 - 80</b>
<b>13. Decisions Plan: 1 December 2021 to 31 May 2022</b> To consider the most recently published version of the Cabinet's Decisions Plan  Report number: <b>CAB/WS/21/060</b> Portfolio holder: Councillor John Griffiths Lead officer: Ian Gallin	<b>81 - 98</b>
<b>14. Revenues Collection Performance and Write Offs</b> Report number: <b>CAB/WS/21/061</b> Portfolio holder: Councillor Sarah Broughton Lead officer: Rachael Mann	<b>99 - 102</b>

## **Key decisions**

<b>15. Barley Homes: Business Plan 2021</b> Report number: <b>CAB/WS/21/062</b> Portfolio holder: Councillor Sara Mildmay-White Lead officer: Julie Baird	<b>103 - 114</b>
<b>16. Exclusion of press and public</b> To consider whether the press and public should be excluded during the consideration of the following items because it is likely, in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the public were present during the items, there would be disclosure to them of exempt categories of information as prescribed in Part 1 of Schedule 12A of the Local Government Act 1972, and indicated against each item and, in all circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.	

## **Part 2 - exempt**

- 17. Exempt Appendix A: Barley Homes: Business Plan 2021 (paragraph 3) 115 - 152**

Exempt Appendix A to Report number: **CAB/WS/21/062**

Portfolio holder: Councillor Sara Mildmay-White

Lead officer: Julie Baird

(This exempt appendix is to be considered in private under paragraph 3 of Schedule 12A of the Local Government Act 1972, as it contains information relating to the financial or business affairs of any particular person (including the authority holding that information))

- 18. Exempt Appendices: Revenues Collection Performance and Write Offs (paragraphs 1 and 2) 153 - 158**

Exempt Appendices 1, 2 and 3 to Report number:

**CAB/WS/21/061**

Portfolio holder: Councillor Sarah Broughton

Lead officer: Rachael Mann

(These exempt appendices are to be considered in private under paragraphs 1 and 2 of Schedule 12A of the Local Government Act 1972, as they contain information relating to an individual and information which is likely to reveal the identity of an individual)

(No representations have been received from members of the public regarding these items being held in private.)

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## Cabinet



**Minutes** of a meeting of the **Cabinet** held on **Tuesday 9 November 2021** at **6.00 pm** in the **Conference Chamber, West Suffolk House**, Western Way, Bury St Edmunds, IP33 3YU

Present

**Councillors**

**Chair** John Griffiths (Leader of the Council)

**Vice Chair** Sara Mildmay-White (Deputy Leader of the Council)

Carol Bull  
Andy Drummond  
Robert Everitt  
Susan Glossop

Joanna Rayner  
David Roach  
Peter Stevens

**By invitation**

Ian Houlder

(Chair of the Performance and Audit  
Scrutiny Committee)

**In attendance**

Ian Shipp

**283. Welcome and meeting facilitation**

The Chair formally opened the meeting and welcomed all persons present within the Conference Chamber and explained that when meeting in person, the Council continued to consider the most recent Government guidance in relation to the safe use of Council buildings to host meetings.

**284. Apologies for absence**

Apologies for absence were received from Councillor Sarah Broughton.

**285. Minutes**

The minutes of the meeting held on 21 September 2021 were confirmed as a correct record and signed by the Chair.

**286. Declarations of interest**

Members' declarations of interest are recorded under the item to which the declaration relates.

## 287. **Open forum**

The following non-Cabinet member spoke under this item:

### 1. **Councillor Ian Shipp (Agenda Item 8: Report number CAB/WS/21/047) Land to the West of Mildenhall: Draft Masterplan**

Councillor Ian Shipp addressed the Cabinet in relation to the above report. Councillor Shipp, who represented the Mildenhall Kingsway and Market Ward, explained the concerns regarding the West Mildenhall Masterplan, of both Mildenhall Town Council and the local residents, regarding the highway related impacts of the development, along with the lack of feasible transport and access to the site. Suffolk County Council and their consultants had presented a number of options to mitigate the transport issues, however, he was not convinced of the viability of these options and whether a suitable solution could be achieved. Reference was also made to the proposed relief road, which was merely an extension to the existing busy road.

Councillor Shipp also stated that it was important that the consultation also took account of the views of those who lived within the local villages around Mildenhall, who would also be affected by this development. He also wanted to ensure that the consultation was undertaken within the local community, to ensure that every opportunity was provided for local people to be able to engage with the consultation.

Therefore, Councillor Shipp requested that the Cabinet acknowledged the concerns raised and ensured that the Masterplan was 'fit-for-purpose'.

Councillor David Roach, Portfolio Holder for Planning, responded to the comments made and acknowledged the concerns raised. He stated that it was important that the consultation obtained as many views from local residents as possible, so that the best outcome could be achieved. The local Mildenhall Ward Members would also continue to be engaged in the process.

The Chair also thanked Councillor Shipp for his comments and concerns and the Cabinet would be discussing the detail of this report, later on the agenda.

## 288. **Public participation**

There were no members of the public in attendance on this occasion.

### 289. **Report of the Anglia Revenues and Benefits Partnership Joint Committee: 21 September 2021 (Report number CAB/WS/21/045)**

The Cabinet received and noted this report, which informed Members of the following substantive items discussed by the Anglia Revenues and Benefits Partnership Joint Committee at their meeting held on 21 September 2021:

1. Performance Reports.
2. Welfare Reform Update.
3. ARP Financial Performance 2021 to 2022.
4. Forthcoming Issues.

On behalf of Councillor Sarah Broughton, Councillor Sara Mildmay-White, Portfolio Holder for Housing and Substitute Member on the ARP Joint Committee, also drew relevant issues to the attention of the Cabinet.

**290. Report of the Performance and Audit Scrutiny Committee: 30 September 2021 (Report number CAB/WS/21/046)**

The Cabinet received and noted this report, which informed Members of the following substantive items discussed by the Performance and Audit Scrutiny Committee at their meeting held on 30 September 2021:

1. Local Government and Social Care Ombudsman: Annual Report 2020 – 2021.
2. Regulation of Investigatory Powers Act 2000 – Annual Report and Review of RIPA Guidance.
3. Delivering a Sustainable Medium-Term Budget.
4. Work Programme Update.

Councillor Ian Houlder, Chair of the Performance and Audit Scrutiny Committee, drew relevant issues to the attention of Cabinet.

**291. Land to the West of Mildenhall: Draft Masterplan (Report number CAB/WS/21/047)**

Councillor David Roach, Portfolio Holder for Planning presented this report which explained that the site was allocated in the Site Allocations Local Plan (SALP) 2019 Development Plan document, which had allocated 97 hectares of land for a mixed use development to include 1300 dwellings with a local centre, a minimum of five hectares of employment land, a 10 hectare Suitable Alternative Natural Green Space (SANG), school, leisure facilities and public services. The public services and leisure facilities element of the scheme had been delivered by the Mildenhall Hub. This Hub included provision for secondary education.

Suffolk County Council (SCC) were the majority landowner for the remainder of the allocated site and, whilst formal agreement had not been reached with the third party owners, they were aware that SCC had begun the process of preparing a Masterplan to inform the future development. In 2019/2020, Suffolk County Council commissioned a series of assessments and reports to inform the early stages of the Masterplan process and held a public consultation on this preliminary information from 4 January 2021 to 15 February 2021.

Suffolk County Council collated the feedback from the consultation and categorised it into several key areas, including site and land use, density, character and design of residential areas, transport movement and connectivity, green infrastructure and climate change. Suffolk County Council

also engaged with West Suffolk Council Officers, along with statutory bodies in order to develop a series of Masterplan framework plans addressing land use, landscape, ecology, drainage and connectivity and movement.

It has been established at the Local Plan stage that there was no requirement for a bypass to the west of Mildenhall to cater for the growth allocated within the Plan. However, Suffolk County Council had acknowledged the need for detailed Highway information at this Masterplan stage in order to set out deliverable highway mitigation measures. Suffolk County Council had agreed the scope of the Transport Assessment with the Local Highway Authority and were undertaking the necessary work to inform this. Such work would not normally be carried out at the Masterplan stage as it was required to inform the outline planning application stage, which followed the adoption of a Masterplan.

Suffolk County Council had submitted this draft Masterplan to West Suffolk Council with the intention to commence a public consultation in mid-November 2021. Officers had reviewed the document in detail and were satisfied that it was in an appropriate form for public consultation and that this was the appropriate time to invite the local community and statutory bodies and organisations to comment on the proposals within the document.

The relevant Ward Members had been regularly briefed on the progress of the draft Masterplan and on the outcome of discussions between Officers at Suffolk County Council and West Suffolk Council. Following on from the statement which had been made by Councillor Ian Shipp, earlier in the meeting, the Cabinet acknowledged that the local Members remained concerned about any potential highway related impacts of the proposed development. Therefore, it was important for the local community to engage with this Masterplan consultation, so that all issues could be raised and properly considered, prior to its adoption.

Approval of the draft Masterplan, subject to a public consultation, would allow Suffolk County Council to seek the views of the community on the content of the document and make any necessary amendments and revisions to the document that may be required, in order to progress towards the adoption of the Masterplan by West Suffolk Council. Once, adopted, the Masterplan would assist the Council to shape the nature and content of future planning applications for this allocated site.

The proposed Masterplan document for public consultation was attached as Appendix A to Report number CAB/WS/21/047.

**Resolved:**

That the West Mildenhall Draft Masterplan be approved for public consultation by the developer team, as set out in Appendix A to Report number CAB/WS/21/047.

292. **West Suffolk Gambling Act 2005: Statement of Policy 2022 to 2025 (Report number CAB/WS/21/048)**

Councillor Andy Drummond, Portfolio Holder for Regulatory and Environment presented this report which explained that the West Suffolk Statement of Gambling Policy set out how the Council, in its role as Licensing Authority, would carry out its functions under the Gambling Act 2005. It recognised the importance of responsible gambling within the entertainment industry, while seeking to balance this with the key objectives of the Act. The objectives were:

- Preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime.
- Ensuring that gambling was conducted in a fair and open way.
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

The objective of the Statement of Policy was to provide a vision for the local area and a statement of intent that guided practice. Licensing authorities must have regard to their Statement when carrying out their licensing functions. The Statement cannot create new requirements for applicants outside of the Act and cannot override the right of any person to make an application, make representations or seek a review of a licence under the Act. However, it could invite people and operators to consider local issues and set out how they could contribute towards positively addressing them.

The revised Policy had been subject to consultation (which had been undertaken between 16 August 2021 and 20 September 2021), contained minor changes and the consultation had broadly supported these changes. Pre-consultation, the only change to the Policy was centred around the statutory reduction of maximum stakes for Fixed Odds Betting Terminals (FOBTs) which was reduced from £100 to £2 and had been enacted into law in April 2019. Following consultation with stakeholders, one additional alteration was made to update the HN Revenues and Customs contact details.

Following the consultation, the Council had updated its Local Area Profile (LAP) (as set out in Appendix C). A LAP was an assessment of the key characteristics of West Suffolk in the context of gambling-related harm. The information obtained for the assessment helped to provide a better understanding of the types of people that were at risk of being vulnerable to gambling-related harm; where they were located and any current or emerging problems that might increase that risk. The local area profile would help set out the Council's expectations of operators of gambling premises. Some or many of these matters would have been considered and addressed by existing premises.

A Statement of Policy typically ran for a period of three years, although there was nothing to prevent the authority from updating more frequently if it wished to. The current Policy expired on 31 January 2022 and a revised version had been consulted on with statutory consultees. This would then require review in 2024, for re-adoption by January 2025.

**Recommended to Council:  
(14 December 2021)**

That:

1. The revised Gambling Act 2005: West Suffolk Statement of Policy for the period 2022 to 2025, as contained in Appendix B to Report number CAB/WS/21/048, be agreed.
2. The revised West Suffolk Local Area Profile (LAP), as contained in Appendix C to Report number CAB/WS/21/048, be agreed.

**293. Animal Welfare Licensing Policy Statement (Report number CAB/WS/21/049)**

Councillor Andy Drummond, Portfolio Holder for Regulatory and Environment explained that the new Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 came into force in October 2018 to update old and out-of-date legislation. Licensable activities covered by the new Regulations included:

- Keeping and training of animals for exhibition – previously a County Council function and included bird of prey displays, animals that have any handling by the public, and non-riding pony parties
- Hiring of horses – riding schools and donkey rides
- Selling of pet animals –pet shops and increasingly includes online sales
- Breeding of dogs – the total number of litters in a year was reduced and sales of high value litters included
- Boarding kennels for dogs
- Home boarding for dogs
- Day care for dogs
- Boarding for cats

The Department for the Environment, Food and Rural Affairs (DEFRA) had issued national guidance for the above activities, as well as procedural guidance for Local Authorities responsible for enforcing the above Regulations. The new Animal Welfare Policy Statement (as set out in Appendix B) had been drafted to recognise and bring together the new 2018 Regulations, the Council's continued duty under the Dangerous Wild Animals Act and the Zoo Licensing Act, as well as the animal licensing process. Currently there was no national scheme of licensing caring for pets in the owner's property or dog walking and these, therefore, fell outside of the scope of this Policy.

There was a statutory duty to undertake a consultation to gauge impact and opinion amongst stakeholders and this had been held between 19 July 2021 and 31 August 2021. The responses received to the consultation were set out in Appendix A to the report.

The Policy Statement summarised West Suffolk Council's approach to licensing animal businesses and activities through animal welfare licences, dangerous wild animal licences and zoo licences. It set out how the Council exercised its functions in relation to animal-related licensing matters under the Dangerous Wild Animals Act 1976, the Zoo Licensing Act 1981,

the Animal Welfare Act 2006 and the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018.

This included dealing with applications for new licences and issues relating to licensed premises., including, but not limited to:

- animal boarding establishments for dogs and cats
- dog breeding
- pet shops
- riding establishments
- keeping or training animals for exhibition
- dangerous wild animals
- zoos

**Resolved:**

That the adoption and implementation of the Animal Welfare Licensing Policy Statement, as set out in Appendix B to Report number CAB/WS/21/049, be agreed.

**294. Council Tax Base for Tax Setting Purposes 2022 to 2023 (Report number CAB/WS/21/050)**

The Cabinet received this report which explained that the Council Tax base was the total taxable value at a point in time of all the domestic properties in the Council's area. It was a yearly calculation and represented the estimated number of chargeable dwellings after allowing for exemptions and discounts, projected changes in the property base and after applying an estimated collection rate.

The Council Tax base was used in the calculation of Council Tax. Each authority divided the total Council Tax income it needed to meet its budget requirement by the tax base of its area to arrive at its band D Council Tax. This was then used to work out the Council Tax for properties in each of the other bands.

Orders had been laid allowing West Suffolk to harmonise the Council Tax of Forest Heath and St Edmundsbury over a period not exceeding seven years. Because of this, it was also necessary to calculate tax base figures for the areas formerly covered by Forest Heath District Council and St Edmundsbury Borough Council (the 'predecessor areas').

The key assumptions, as outlined within the report, had been set at a time when the impact of COVID-19 recovery and the end of the furlough scheme, were difficult to predict. At this stage, very early data (taken from the first two weeks of October) was not indicating any spike in the Local Council Tax Reduction Scheme numbers and therefore, minimal allowance had been made for any increase in claimant numbers.

Paragraph 2.6 of Report Number CAB/WS/21/050 set out the resulting tax base figure for council tax collection purposes for the whole of West Suffolk, expressed in terms of the number of Band D equivalent properties, which was 57,406.34. The tax base figure was analysed further across individual town and parish councils to form their tax base figures for the purpose of budget

setting and determining the parish band D tax levels in each of those areas. The town/parish figures were set out in Appendix 3 to the report.

**Recommended to Council:  
(14 December 2021)**

That:

1. The tax base for 2022 to 2023, for the whole of West Suffolk is 57,406.34 equivalent band D dwellings, and for each of the predecessor areas be: Forest Heath 19,455.81 and St Edmundsbury 37,950.53, as detailed in paragraph 2.6 of Report number CAB/WS/21/050.
2. The tax base for 2022 to 2023 for the different parts of its area, as defined by parish or special expense area boundaries, be as shown in Appendix 3 of Report number CAB/WS/21/050.
3. The Director (Resources and Property) be given delegated responsibility to make changes to the tax base figures as a result of any government announcements pertaining to local council tax support or any data updates relating to significant claimant increases, as detailed in paragraph 2.5 of Report number CAB/WS/21/050.

**295. Decisions Plan: 1 November 2021 to 31 May 2022 (Report number CAB/WS/21/051)**

The Cabinet considered this report which was the Cabinet Decisions Plan covering the period 1 November 2021 to 31 May 2022.

Members took the opportunity to review the intended forthcoming decisions of the Cabinet; however, no further information or amendments were requested on this occasion.

**296. Proposed Incubation Units: Suffolk Business Park, Bury St Edmunds (Report number CAB/WS/21/052)**

Councillor Susan Glossop, Portfolio Holder for Growth presented this report which explained that the West Suffolk Strategic Framework 2020 to 2024 set out three strategic priorities, including the Council's commitment to focus its energies and resources on the "*Growth in West Suffolk's economy for the benefit of all our residents and UK plc*". This proposed project was a key example of how the Council could support and invest in its communities and businesses as it provided incubation space for new and developing companies that would not otherwise be provided.

The purpose of this report was to seek authority for the development of 40,000 sq. ft of start-up/incubation space, as phase one, for companies mainly in the advanced manufacturing and engineering (AME) sector and its supply chain. The costs of borrowing to fund this development through prudential borrowing, would be covered by the business rates that were forecasted to be retained locally, as a result of the Enterprise Zone at Suffolk Park, Bury St Edmunds.



A full Business Case for Phase One was attached as Appendix A (this included Exempt Appendix 2) and this in turn was supported by a Risk Register (Appendix 1) and a high-level Project Plan (Appendix 3). Additional Business Case(s) would be required to bring forward Phase Two.

The Phase One Business Case set out the strategic, economic, commercial, financial and management cases for this development. It set out the project objectives and concluded that the case was made for the proposal to be supported and delivered in line with the high-level programme. The project required the allocation of approximately £12.1m of capital funding which was assumed to be funded through prudential borrowing from the Public Works Loan Board (PWLb). The Financial Case explained the assumptions that had been made to determine the capital cost, revenue implications, cash flow projections and the unique arrangement for financing the debt over 17 years, along with some retention of the Business Rates received from the Enterprise Zone on Suffolk Business Park which would be used to pay for the costs of borrowing, with support from the LEP and Suffolk County Council.

This project provided the opportunity to deliver on the Council's original vision for the employment allocation at Suffolk Business Park. It built on the commitment shown by the Council, New Anglia LEP and Suffolk County Council to funding/developing the Eastern Relief Road (now Rougham Tower Avenue) and also reflected the intent behind establishing the Enterprise Zone on Suffolk Park. The intention was that, once built, the Centre would be run by a leading provider of business support to the Advanced Manufacturing and Engineering sector (AME). This would be a first for West Suffolk and a significant achievement. The aim was to provide space for start-up or growing businesses in a supported/flexible environment, with access to high quality business advice and networking opportunities.

**Recommended to Council:  
(14 December 2021)**

That:

1. The Business Case attached as Appendix A to Report number CAB/WS/21/052, be approved and the project objectives be endorsed.
2. The purchase of 6.8 acres of net developable land to enable the project to be delivered, be approved.
3. The development of 40,000 sq. ft employment space (phase one) on Zone 3 of Suffolk Business Park in accordance with the details contained in the Business Case, be approved.
4. A £12.1m capital budget for phase 1 only, funded through the Investing in our Growth Fund through Prudential borrowing with the revenue impact in line with the Financial Case section of Appendix A to Report number CAB/WS/21/052, be approved.
5. Officers to proceed in line with the Council's agreed Scheme of Delegation. However, where necessary, agreement be sought for delegation to the Director (Resources and Property) and the

Director (Planning and Growth), in consultation with the Portfolio Holder for Resources and Property and with the Portfolio Holder for Growth, to make changes to the proposal to reflect the need for the project to evolve as time moves forward and to enable the project to be delivered in accordance with the Finance Case and the Programme.

6. The Council's Section 151 Officer to make the necessary changes to the Council's prudential indicators, as a result of recommendation 4. above.

**297. Exclusion of press and public**

See Minute number 298. below.

**298. Exempt Appendix 2: Proposed Incubation Units: Suffolk Business Park, Bury St Edmunds (paragraph 3)**

**(Report number CAB/WS/21/052)**

The Cabinet considered the exempt Appendix 2 to this report. However, no reference was made to specific detail and, therefore, this item was not held in private session.

The meeting concluded at 6.40 pm

**Signed by:**

**Chair**

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# Report of the Overview and Scrutiny Committee: 11 November 2021

<b>Report number:</b>	<b>CAB/WS/21/053</b>	
<b>Report to and date:</b>	<b>Cabinet</b>	7 December 2021
<b>Chair of the Overview and Scrutiny Committee:</b>	Councillor Ian Shipp Overview and Scrutiny Committee Telephone: 07368 134769 Email: <a href="mailto:ian.shipp@westsuffolk.gov.uk">ian.shipp@westsuffolk.gov.uk</a>	
<b>Lead officer:</b>	Christine Brain Democratic Services Officer (Scrutiny) Telephone: 01638 719729 Email: <a href="mailto:christine.brain@westsuffolk.gov.uk">christine.brain@westsuffolk.gov.uk</a>	

**Decisions Plan:** This item is not required to be included on the Decisions Plan.

**Wards impacted:** All wards

**Recommendation:** It is recommended that Report number: CAB/WS/21/053, being the report of the Overview and Scrutiny Committee, be noted.

## 1. Context to this report

1.1 On 11 November 2021, the Overview and Scrutiny Committee considered the following items:

1. Health - Portfolio Holder Overview
2. Air Quality and Anti-Idling Campaign Update
3. Suffolk County Council: Health Scrutiny Committee – 13 October 2021
4. Cabinet Decisions Plan: 1 November 2021 to 31 May 2022
5. Work programme update 2022

## 2. Proposals within this report

### 2.1 Health – Portfolio Holder Overview (Report number: OAS/WS/21/020)

2.1.1 At its meeting on 2 September 2021, the Committee had requested further information in relation to the role of the Portfolio Holder for Strategic Health and Housing in relation to health, which followed changes made to her portfolio holder responsibilities announced by the Leader in July 2021.

2.1.2 The Committee received and **noted** the report, which set out the role and responsibility held by the Portfolio Holder for Strategic Health and Housing, and the Portfolio Holder for Families and Communities in relation to health.

2.1.3 For a number of years, the Council has been working alongside partners in the health and care sector. This work has been wide ranging but falls largely into two broad areas:

- Prevention and early intervention
- Effective partnerships

The close co-operation between health providers and the Council was accelerated during the Covid-19 pandemic and will remain important during the recovery phase.

2.1.4 Recognising that there were a number of significant projects and initiatives to support and/or deliver over the next few years the Portfolio Holder for Strategic Health and Housing was asked by the Leader of the Council to take a more strategic leadership perspective in relation to health and would be responsible for the following areas of focus:

- Future system programme
- Health and care governance

2.1.5 The Portfolio Holder for Strategic Health and Housing's role in health was in addition to that of the Portfolio Holder for Families and Communities. This

was in response to the growing workload associated with health and the Council's role in the pandemic recovery and reducing health inequalities.

- 2.1.6 The Portfolio Holder for Families and Communities would retain the lead for the wider health responsibilities, including, but not limited to, Suffolk Health and Wellbeing Board; delivery of the social prescribing LifeLink service; community safety; supporting the voluntary and community sector; and building community capacity and resilience.
- 2.1.7 The Council has a seat on the Suffolk County Council Health Scrutiny Committee. This role was separate to that of the portfolio holders as the Committee was responsible for scrutinising wellbeing and health services across the county.
- 2.1.8 The Committee considered the report and asked questions to which comprehensive responses were provided by the Cabinet Member. In particular discussions were held on the "future system programme" in relation to thinking ahead and building in health capacity into the local plan and being more ambitious with the local plan; linking health with housing; the need for more health hubs locally for people to access; planning for unintentional consequences; the West Suffolk Hospital public consultation events; and the restart of community groups following the pandemic.

## **2.2 Air Quality and Anti-Idling Campaign Update (Report number: OAS/WS/21/021)**

- 2.2.1 At its meeting on 2 September 2021, the Committee had considered a work programme suggestion on anti-idling and asked officers to consider using the Civil Enforcement Officers (CEO) to issue Fixed Penalty Notices (FPN) under the 2002 traffic regulations. Officers did not consider issuing FPN was appropriate but did agree that CEO would undertake informal action and record the findings of interactions with idling drivers.
- 2.2.2 The Committee received an update on the anti-idling campaign, other air quality improvement work and an initial update on the work of the CEOs approaching idling drivers as part of their day-to-day activities by asking drivers to switch their engines off.
- 2.2.3 The Committee considered the report and asked questions to which responses were provided. In particular discussions were held on getting back into schools to spread the anti-idling message and the possibility of a poster competition for schools; the Suffolk Air Quality Summit being held on 26 November 2021; more engagement with businesses on anti-idling; and whether literature could be included within Council Tax bills, to which responses were provided.

2.2.4 The Committee made the following suggestions:

- Including the anti-idling figures where CEOs have approached drivers in the monthly report members already received which listed all Civil Parking Enforcement figures.
- Using online videos in schools on anti-idling until officers were able to enter schools again, due to the Covid-19 pandemic.
- Whether there was any scope in talking with Suffolk County Council Highways in having signage behind roadworks to remind drivers about anti-idling.
- More social media posts on the consequences of unnecessary idling.

Officers agreed to look into the above suggestions.

2.2.5 The Committee **noted** the update subject to comments made during the meeting.

2.3 **Suffolk County Council: Health Scrutiny Committee – 13 October 2021 (Report number: OAS/WS/21/022)**

2.3.1 The Committee received and **noted** the report, prepared by Councillor Margaret Marks setting out what was considered at its meeting held on 13 October 2021. The focus of the meeting was:

- To consider the impact and current challenges in delivering Primary Care services has on patients
- Provision of GP Services in Suffolk
- Healthwatch Suffolk

2.3.2 The Committee considered the report and asked questions to which Councillor Marks provided comprehensive responses. In particular detailed discussions were held on GP vacancies in West Suffolk; the lack of NHS dentists and questioned what was planned to resolve the issue and the draft recommendations made by the Health Scrutiny Committee.

2.4 **Cabinet Decisions Plan: 1 November 2021 to 31 May 2022 (Report number: OAS/WS/21/023)**

2.4.1 The Committee reviewed and **noted** the latest version of the Cabinet Decisions Plan, covering the period 1 November 2021 to 31 May 2022.

2.4.2 Councillor Mike Chester referred to the "Applications for Community Chest 2022 to 2023" and asked how the process worked. In response, Councillors

Ian Shipp, Margaret Marks and Diane Hind, who also sat on the West Suffolk Grant Working Party agreed to discuss the process with Councillor Chester following the meeting.

- 2.4.3 The Committee considered the Decisions Plan and did not request any further information on items contained in the Plan.

**2.5 Work programme update 2022 (Report number: OAS/WS/21/024)**

- 2.5.1 The Committee received and **noted** Report number OAS/WS/21/024, which updated members on the current status of its rolling work programme of items, and items currently agreed but had yet to be programmed for 2022 as attached at Appendix 1.
- 2.5.2 The Chair informed members he would be writing to Suffolk County Council seeking an update report for its 13 January 2022 meeting relating to the Councillor Call for Action Hearing held on 2 September 2021 and the recommendations made by the Committee.
- 2.5.3 Councillor Diane Hind referred to Appendix 1, and the list of items carried forward and not yet scheduled and suggested that the item on "Homes for Life" be programmed for a future meeting of the Committee, which the Democratic Services Officers (Scrutiny) agreed to progress with officers.

**3 Alternative options that have been considered**

- 3.1 Please see background papers.

**4 Consultation and engagement undertaken**

- 4.1 Please see background papers.

**5 Risks associated with the proposals**

- 5.1 Please see background papers.

**6 Implications arising from the proposals**

- 6.1 Financial:

Please see background papers.

- 6.2 Equalities:

Please see background papers.

## **7 Appendices referenced in this report**

- 7.1 Please see background papers.

## **8 Background documents associated with this report**

- 8.1 Report number: [OAS/WS/21/020](#) to the Overview and Scrutiny Committee: Health - Portfolio Holder Overview
- 8.2 Report number: [OAS/WS/21/021](#) to the Overview and Scrutiny Committee: Air Quality and Anti-Idling Campaign Update
- 8.3 Report number: [OAS/WS/21/022](#) and [Appendix 1](#), [Appendix 1A](#), [Appendix 1B](#) and [Appendix 1C](#) to the Overview and Scrutiny Committee: Suffolk County Council Health Scrutiny Committee – 13 October 2021
- 8.4 Report number: [OAS/WS/21/023](#) and [Appendix 1](#) to the Overview and Scrutiny Committee: Cabinet Decisions Plan: 1 November 2021 to 31 May 2022
- 8.5 Report number: [OAS/WS/21/024](#) and [Appendix 1](#) to the Overview and Scrutiny Committee: Work Programme Update 2022



# Report of the Performance and Audit Scrutiny Committee: 18 November 2021

<b>Report number:</b>	<b>CAB/WS/21/054</b>	
<b>Report to and date:</b>	<b>Cabinet</b>	7 December 2021
<b>Cabinet member:</b>	Councillor Sarah Broughton Portfolio Holder for Resources and Property Telephone: 07929 305787 Email: <a href="mailto:sarah.broughton@westsuffolk.gov.uk">sarah.broughton@westsuffolk.gov.uk</a>	
<b>Chair of the Performance and Audit Scrutiny Committee:</b>	Councillor Ian Houlder Performance and Audit Scrutiny Committee Telephone: 07597 961069 Email: <a href="mailto:ian.houlder@westsuffolk.gov.uk">ian.houlder@westsuffolk.gov.uk</a>	
<b>Lead officer:</b>	Christine Brain Democratic Services Officer (Scrutiny) Telephone: 01638 719729 Email: <a href="mailto:christine.brain@westsuffolk.gov.uk">christine.brain@westsuffolk.gov.uk</a>	

**Decisions Plan:** This item is not required to be included on the Decisions Plan.

**Wards impacted:** All wards

**Recommendation:** It is recommended that Report number: CAB/WS/21/054, being the report of the Performance and Audit Scrutiny Committee, be noted.

## **1. Context to this report**

1.1 On 18 November 2021, the Performance and Audit Scrutiny Committee considered the following items:

1. Formal decision making on “minded to” decisions
2. Ernst and Young - 2020-2021 Annual Results Report to those Charged with Governance
3. West Suffolk Annual Governance Statement 2020-2021
4. 2020-2021 Statement of Accounts
5. Arrangements for Appointment of External Auditors
6. Internal Audit Mid-Year Progress Report 2021-2022
7. 2021-2022 Performance Report (Quarter 2)
8. Delivering a Sustainable Medium-Term Budget
9. Treasury Management Report (September 2021)
10. Work Programme Update 2022

Separate reports are included on this Cabinet agenda for Items 5, 8 and 9 above.

## **2. Proposals within this report**

2.1 **Formal decision making on “minded to” decisions**

2.1.1 Taking into account the ‘minded to’ decisions made during the non-decision-making virtual meeting of the Performance and Audit Scrutiny Committee on 30 September 2021, the Committee unanimously resolved the following matters:

1. Confirmed the minutes of the meeting held on 29 July 2021.
2. Approved the Council’s RIPA Guidance, taking into account the recommendations of the Investigatory Powers Commissioner’s Office (IPCO).

2.2 **Ernst and Young – 2020 to 2021 Annual Results Report to those Charged with Governance (Report number: PAS/WS/21/018)**

2.2.1 Prior to the consideration of the 2020 to 2021 Statement of Accounts, the Committee received the above report from Mark Hodgson (Associate Partner) from Ernst and Young (EY) on the results of EY’s work to date. A copy of the Audit Results Report was attached as Appendix A. Attached at Appendix B was the Letter of Representation on behalf of the Council in connection with the audit of the financial statements for the year ended 31 March 2021.

2.2.2 Mr Hodgson presented the report and explained that the overall materiality assessment was £1.992 million. He then drew the Committee’s attention

to the executive summary, which set out the status of the audit and updated the Committee on work which had been completed since the Audit Results Report was produced on 8 November 2021 and confirmed EY was working towards signing off the audit by 30 November 2021. He explained that there was a very limited number of corrections; EY had not identified any value for money risks; there were no matters to report under the audit opinion, and EY would be issuing its Annual Audit Opinion in December 2021.

2.2.3 Mr Hodgson advised the draft Financial Statements were robust and wished to thank Rachael Mann, Director (Resources and Property) and her team for their assistance during the audit.

2.2.4 The Committee then asked questions in relation to the report, to which Mr Hodgson duly responded. In particular discussions were held on the pension valuations, disclosures and the timing of the accounts.

2.2.5 The Committee then **Resolved**: That

1. The work in respect of the External Auditors unqualified audit opinion, as of today (18 November 2021) on the Financial Statements of West Suffolk Council for 2020 to 2021 (Appendix A) attached to Report number PAS/WS/21/018 was ongoing, be **noted**.
2. The External Auditors had no matters to report on the council's arrangements to secure economy, efficiency and effectiveness in its use of resources, issued by the Auditor, (Appendix A), be **noted**.
3. The Letter of Representation on behalf of West Suffolk Council (Appendix B) attached to Report number PAS/WS/21/018, be **approved**, before the Ernst and Young Associate Partner issues his opinion and conclusion.
4. The Chief Finance Officer, in consultation with the Chair of the Performance and Audit Scrutiny Committee be given **delegated authority** to conclude the signing of the 2020 to 2021 accounts.

2.3 **West Suffolk Annual Governance Statement 2020-2021  
(Report number: PAS/WS/21/019)**

2.3.1 The Committee received Report number: PAS/WS/21/019, which sought Members' approval of the West Suffolk Annual Governance Statement (AGS) 2020 to 2021, attached as Appendix A, for signing by the Leader of the Council and the Chief Executive.

- 2.3.2 The AGS is designed to provide stakeholders of the Council with the assurance that the Council has operated within the law and that the Council has met the requirements of the Accounts and Audit Regulations 2015.
- 2.3.3 The draft AGS has been prepared by the Officer Governance Group and is West Suffolk Council's second AGS.
- 2.3.4 The Committee considered the report and did not raise any particular issues.
- 2.3.5 The AGS for 2020 to 2021, attached as Appendix A to Report number: PAS/WS/21/019 was **approved** for signing by the Leader of the Council and the Chief Executive.
- 2.4 **2020-2021 Statement of Accounts  
(Report number: PAS/WS/21/020)**
  - 2.4.1 The Committee scrutinised the 2020 to 2021 Statement of Accounts as contained within Report number: PAS/WS/21/020. Approval was sought for the accounts attached at Appendix A, in accordance with the powers delegated to it under the Council's Constitution.
  - 2.4.2 The Statement of Accounts (Appendix A) had been amended, as appropriate to take on board issues raised by the audit process up to the date of distribution.
  - 2.4.3 The covering report summarised financial highlights in 2020 to 2021; revenue expenditure; capital expenditure; usable reserves; pensions fund; annual governance statement and payments to councillors. The Director (Resources and Property) then drew the Committee's attention to a couple of key areas as set out in the report and Appendix A.
  - 2.4.4 The Committee scrutinised the draft accounts and asked questions on the interest and investment income; Barley Homes Shares; the increase in external audit costs and senior officers' remuneration to which comprehensive responses were provided.
  - 2.4.5 The Committee then **Resolved**: That
    - 1. The 2020 to 2021 Statement of Accounts for West Suffolk Council (Appendix A), attached to Report number: PAS/WS/21/020, in accordance with the powers delegated to it under the Council's Constitution, be **approved**.

2. The Chair of the Performance and Audit Scrutiny Committee signs the certification for the 2020 to 2021 Statement of Accounts on behalf of the Committee.
3. The Chief Finance Officer, in consultation with the Cabinet Member for Resources and Property, be given **delegated authority** to make any changes that may be required up to the date of publication.

**2.5 Internal Audit Mid-Year Progress Report 2021 to 2022  
(Report number: PAS/WS/21/022)**

- 2.5.1 The Committee received and **noted** the Internal Audit Mid-Year progress report 2021 to 2022, which updated members on progress made against internal audit's 2021 to 2022 work plan approved the Committee in May 2021.
- 2.5.2 The report provided a flavour of the work undertaken in the year to date. Attached at Appendix A to the report was the Mid-year Internal Audit Progress Report 2021 to 2022.
- 2.5.3 The Committee considered the report and did not raise any questions.

**2.6 2021-2022 Performance Report – Quarter 2  
(Report number: PAS/WS/21/023)**

- 2.6.1 The Committee received Report number: PAS/WS/21/023, which set out the impact of Covid-19 and the Quarter 2 performance and forecast year-end financial position for 2021 to 2022 up to 30 September 2021
- 2.6.2 Since the outbreak of Covid-19 in the UK, a number of events had occurred which had had a significant impact on West Suffolk Council's financial position. Some of these had been restrictions imposed by Government that had affected West Suffolk Council's investments and services; and others had been announcements of Government financial support.
- 2.6.3 The Council has played its part in responding to Covid-19 in supporting businesses and the most vulnerable as well as running essential services. The monthly returns to the Department for Levelling Up, Housing and Communities have detailed the financial impacts of Covid-19, and generally the forecast impacts have remained consistent on a month-by-month basis. The latest submission shows a total impact of £4.3 million (costs of £1.8 million and lost income of £2.5 million). However, it should be noted that these are required to be gross figures and therefore an element of the additional costs such as internal staff redeployment, grant funded costs and costs savings have also been factored into the figures.

- 2.6.4 Covid-19 and our response to it has consequently impacted on a number of our local indicators, most noticeably around housing and homelessness. Within these figures, the income generated by the council in the current financial year through sales, fees and charges has reduced by £2.5 million, mitigated to a certain extent by the sales, fees and charges compensation from central government. (Further details of the financial impacts of Covid-19 can be found in Appendix F).
- 2.6.5 The impact of Covid-19 is likely to be felt for years to come as the council will need to make provision in its medium-term budget plans for the impact on the collection fund deficits, recovery to pre-covid income and expenditure levels and the replenishment of its earmarked reserves and general fund balances.
- 2.6.6 Attached to the Quarter 2 performance report were a number of appendices which set out the performance and financial outturn position for 2021 to 2022 up to 30 September 2021 as follows:
- Appendix A: Performance Indicators – Commentary
  - Appendix B: Performance Indicators – Growth
  - Appendix C: Performance Indicators – Families and Communities
  - Appendix D: Performance Indicators – Housing
  - Appendix E: Performance Indicators – Day to Day
  - Appendix F: Income and Expenditure Report
  - Appendix G: Capital Programme
  - Appendix H: Earmarked Reserves
  - Appendix I: Strategic Risk Register
- 2.6.7 Members considered the report in detail and asked questions of the Directors, to which responses were provided. Discussions were also held on:
- Appendix A: Total debt over 90 days (in particular relating to large debtors)  
Appendix A: Income from commercial waste.
- 2.6.8 At the conclusion of the discussions, the Committee **noted** the:
- Impact of Covid-19 on the Council's current financial year 2021 to 2022 (Section 1 of the report).
  - Forecast 2021 to 2022 Revenue and Capital positions as detailed in the report and appendices.
- 2.7 **Work programme update 2022 (Report number: PAS/WS/21/025)**
- 2.7.1 The Committee received Report number: PAS/WS/21/025, which provided information on the current status of its forward work programme for 2022.

- 2.7.2 The Committee **noted** the contents of its forward work programme for 2022.

## **5. Alternative options that have been considered**

- 3.1 Please see background papers.

## **6. Consultation and engagement undertaken**

- 4.1 Please see background papers.

## **7. Risks associated with the proposals**

- 5.1 Please see background papers.

## **8. Implications arising from the proposals**

- 6.1 Financial:  
Please see background papers.

- 6.2 Equalities:  
Please see background papers.

## **9. Appendices referenced in this report**

- 7.1 Please see background papers.

## **10. Background documents associated with this report**

- 8.1 Report number: [PAS/WS/21/018](#) and [Appendix A](#) and [Appendix B](#) to the Performance and Audit Scrutiny Committee: Ernst and Young - 2020-2021 Annual Results Report to those Charged with Governance.
- 8.2 Report number: [PAS/WS/21/019](#) and [Appendix A](#) to the Performance and Audit Scrutiny Committee: West Suffolk Annual Governance Statement 2020-2021
- 8.3 Report number: [PAS/WS/21/020](#) and [Appendix A](#) to the Performance and Audit Scrutiny Committee: 2020-2021 Statement of Accounts
- 8.4 Report number: [PAS/WS/21/021](#) to the Performance and Audit Scrutiny Committee: Arrangements for Appointment of External Auditors

- 8.5 Report number: [PAS/WS/21/022](#) and [Appendix A](#) to the Performance and Audit Scrutiny Committee: Internal Audit Mid-Year Progress Report 2021-2022
- 8.6 Report number: [PAS/WS/21/023](#) and appendices [A](#), [B](#), [C](#), [D](#), [E](#), [F](#), [G](#), [H](#) and [I](#) to the Performance and Audit Scrutiny Committee: 2021-2022 Performance Report (Quarter 2)
- 8.7 Report number: [PAS/WS/21/025](#) and [Appendix 1](#) to the Performance and Audit Scrutiny Committee: Work Programme Update 2022



# Recommendation of the Performance and Audit Scrutiny Committee: 18 November 2021: Arrangements for Appointment of External Auditors

<b>Report number:</b>	<b>CAB/WS/21/055</b>	
<b>Report to and date(s):</b>	<b>Cabinet</b>	7 December 2021
	<b>Council</b>	14 December 2021
<b>Cabinet member:</b>	Councillor Sarah Broughton Portfolio Holder for Resources and Property Telephone: 07929 305787 Email: <a href="mailto:sarah.broughton@westsuffolk.gov.uk">sarah.broughton@westsuffolk.gov.uk</a>	
<b>Chair of the Performance and Audit Scrutiny Committee:</b>	Councillor Ian Houlder Performance and Audit Scrutiny Committee Telephone: 07597 961069 Email: <a href="mailto:ian.houlder@westsuffolk.gov.uk">ian.houlder@westsuffolk.gov.uk</a>	
<b>Lead officer:</b>	Rachael Mann Director (Resources and Property) Telephone: 01638 719245 Email: <a href="mailto:rachael.mann@westsuffolk.gov.uk">rachael.mann@westsuffolk.gov.uk</a>	

**Decisions Plan:** The decision made as a result of this report will usually be published within 48 hours. This item will be referred to Council for a final decision and is, therefore, not subject to call-in. This item is included on the Decisions Plan.

**Wards impacted:** All wards

**Recommendation:**      **Subject to the approval of Council, it is recommended to continue to 'opt-in' to the sector led body (Public Sector Audit Appointments Limited (PSAA)) for the independent appointment of the Council's external auditor, beginning with responsibilities for the financial year 2023 to 2024.**

## **1. Context to this report**

### **1.1 Arrangements for appointment of external auditors**

1.2 In September 2016, the former Forest Heath and St Edmundsbury Councils' Performance and Audit Scrutiny Committees received papers regarding the appointment of external auditors for a period of five years from 1 April 2018. The Local Audit and Accountability Act 2014 brought to a close the Audit Commission and established transitional arrangements for the appointment of external auditors, and the setting of audit fees for all local government and NHS bodies in England.

1.3 At the end of the transitional arrangements, public bodies were asked to specify their preferred method of appointing external auditors, and a sector led body (the Public Sector Audit Appointments LTD (PSAA)) was chosen.

1.4 A sector led body has the opportunity to negotiate contracts with firms nationally, maximising the opportunity for the most economic and efficient approach for procurement of external audit on behalf of the whole sector. The scheme was designed to save time and resources for local government bodies and, through collective procurement, secure the best prices without compromising on audit quality.

1.5 West Suffolk Council agreed to continue to use the PSAA (Report number: [COU/SA/18/010](#) - Appointment of External Auditors) as its route to select its external auditors Ernst and Young for the remaining term of the five years from 1 April 2019 (ending the financial year 2022 to 2023).

1.6 The Committee received Report number: PAS/WS/21/021, which asked the Committee to consider options available for the appointing process for external auditors from 2023 to 2024. The Council could choose one of the following options:

1. Procurement via PSAA;
2. Establish a stand-alone appointment; or
3. Set up a joint auditor panel/local joint procurement arrangements.

1.7 Legislation requires a resolution of Council if a local authority wishes to opt into the national arrangement (the PSAA). The practical deadline for this decision is 11 March 2022.

1.8 The report set out in detail the advantages and disadvantages for each of the three options and legal implications.

- 1.9 The Committee was advised that opting into the PSAA arrangements for the appointing process would be the best option to work alongside other Councils and influence a particularly difficult market.

1.10 **Performance and Audit Scrutiny Committee**

- 1.11 The Performance and Audit Scrutiny Committee scrutinised the report in detail and asked a number of questions to which officers duly responded. In particular the Committee asked how the PSAA process worked, to which officers explained the process was carried out in lots last time through a national procurement process, which was considered a guarantee for a good quality audit service.

- 1.12 The Performance and Audit Scrutiny Committee has put forward a recommendation as set out on page one of this report.

**2. Alternative options that have been considered**

- 2.1 See Report number: [PAS/WS/21/021](#)

**3. Consultation and engagement undertaken**

- 3.1 Not applicable.

**4. Risks associated with the proposals**

- 4.1 See Report number: [PAS/WS/21/021](#)

**5. Implications arising from the proposals**

- 5.1 Financial: See Report number: [PAS/WS/21/021](#)

**6. Appendices referenced in this report**

- 6.1 None.

**7. Background documents associated with this report**

- 7.1 Report number: [PAS/WS/21/021](#)

# Recommendation of the Performance and Audit Scrutiny Committee: 18 November 2021 - Delivering a Sustainable Medium-Term Budget

<b>Report number:</b>	<b>CAB/WS/21/056</b>	
<b>Report to and date(s):</b>	<b>Cabinet</b>	7 December 2021
	<b>Council</b>	14 December 2021
<b>Cabinet member:</b>	Councillor Sarah Broughton Portfolio Holder for Resources and Property Telephone: 07929 305787 Email: <a href="mailto:sarah.broughton@westsuffolk.gov.uk">sarah.broughton@westsuffolk.gov.uk</a>	
<b>Chair of the Performance and Audit Scrutiny Committee:</b>	Councillor Ian Houlder Performance and Audit Scrutiny Committee Telephone: 07597 961069 Email: <a href="mailto:ian.houlder@westsuffolk.gov.uk">ian.houlder@westsuffolk.gov.uk</a>	
<b>Lead officer:</b>	Rachael Mann Director (Resources and Property) Telephone: 01638 719245 Email: <a href="mailto:rachael.mann@westsuffolk.gov.uk">rachael.mann@westsuffolk.gov.uk</a>	

**Decisions Plan:** The decision made as a result of this report will usually be published within 48 hours. This item will be referred to Council for a final decision and is, therefore, not subject to call-in. This item is included on the Decisions Plan.

**Wards impacted:** All wards

**Recommendation:**      **It is recommended that, subject to the approval of Council, the proposals as detailed in Section 2 and Table 1 at paragraph 3.6 of Report number: PAS/WS/21/024, be included in the medium-term financial plans to 2026.**

## 1. Context to this report

- 1.1 At its meeting on 30 September 2021, Report number [PAS/WS/21/016](#), outlined the process and approach to setting the Council's 2022 to 2023 budget and the principles and challenges faced in achieving this
- 1.2 The Committee on 18 November 2021, received an update on assumptions and anticipated savings and initiatives proposed or delivered to date to deliver a sustainable and balanced budget for 2022 to 2023. Proposed key budget assumptions were set out in Section 2 of the report (and below).

### 1.3 Extract from Report number: PAS/WS/21/024: (Section 2 and Table 1)

#### 1.3.1 2. Proposals within this report – key budget assumptions

- 2.1 Report number [PAS/WS/21/016](#) set out a number of key budget assumptions proposed in the development of the 2022 to 2023 budget and medium-term plans and the rationale behind those assumptions. These assumptions are constantly under review, in response to further data and intelligence. Since this last report, there have been the following updates as set out below.

#### **Government funding – Spending Review 2021**

- 2.2 In the Spending Review 2021 of 27 October 2021 there were several statements about funding for local government. A £4.8 billion increase (over 3 years) in direct grant funding was declared. However, £3.6 billion of this amount is targeted for social care reform, so aimed at County/Unitary Councils and its also expected that any new spending pressures announced (such as the national insurance increase) will also need to be funded through this allocation. What is not known at this time is the detail on how the headline 'Local Government funding' will be distributed to councils and whether this directly translates into winners and losers at individual Council level.
- 2.3 There was also no confirmation on local government funding reforms relating to the Fairer Funding Review and 75 per cent Business Rates Retention (BRR) scheme. The Government remain committed to these reforms, although have not set out any confirmed timeframe for when they would be completed and implemented. A roll forward of the 2021 to 2022 settlement hasn't been ruled out at this stage.
- 2.4 As a result of this current uncertainty about the detail of future government funding we continue to include the following assumptions in our medium-term financial plans:
  - There will be no further COVID-19 support for either costs incurred or loss of Fees and Charges income.
  - That no Revenue Support Grant or New Homes Bonus allocation (or replacement) will be rolled forward into 2022 to 2023 as it was always the Government's intention to phase out these grant streams.

- The budget estimates assume a continuation of the 10 per cent reductions in the centrally held un-ringfenced grants budget for 2021 to 2022 in line with previous Government funding reductions. This includes grants such as Housing Benefit Administration.
- There will be no Fairer Funding Review and some form of Business Rate Retention (BRR) scheme resetting from April 2022 will take place. The current projections already assume a significant loss of BRR scheme growth (accumulated since the scheme was implemented in 2013) from April 2022 and this assumption remains unchanged at this stage.
- That Suffolk authorities will remain in a business rates pool for 2022 to 2023, retaining additional BRR scheme income for Suffolk than that of individual authorities.

- 2.5 These Government funding assumptions will be kept under constant review as part of the budget process and following any announcements regarding the detailed funding allocations (expected 5 December 2021 but likely to be much later in December as per previous years) and grant payments and/or consultations from central Government. This collection of assumptions has the biggest financial impact on the council's budget given the sums involved.

#### **Other income assumptions**

- 2.6 There has been a detailed line by line review of the 2022 to 2023 income budget assumptions across a best, base and worst-case scenario. The material outcomes of this review are included on Table 1 below. Where there is uncertainty linked to continued COVID-19 impact the approach will be to access the use of a further years COVID impact provision, created from the Councils General Fund balance, with the expectation that there will be a full return to budgeted income levels in the medium term. There is expected to be a greater level of volatility in these income assumptions given the relationship between recovery and income generation for the council. This volatility will need to be closely monitored and reflected in the Section 151 report to members on the robustness of estimates and balances as part of the budget process.

#### **Business rates estimate for 2022 to 2023**

- 2.7 It is very difficult to predict the ongoing impact of COVID-19 on businesses within the district and the impact this may have on the level of business rates income collected. In 2020 to 2021 Government announced significant retail reliefs to support business through the pandemic. They continued that support, in part, during the current year 2021 to 2022. We are yet to receive any guidance or funding allocations for the announced national £1.5 billion discretionary business rate relief fund for 2021 to 2022.
- 2.8 The Spending Review 2021 on 27 October 2021 did include some changes to business rates for the next three years, with a commitment that councils will



be fully reimbursed under the current Business Rate Retention Scheme through Section 31 grants:

- The planned increase in the business rates multiplier has been cancelled. The multiplier was due to be increased by 3.1 percent, in line with the September increase in the Consumer Price Index (CPI). Local authorities will receive “cap compensation” funding to offset this.
- 50 percent discount for retail, hospitality and leisure sectors (up to a maximum of £110,000).
- Other reforms, including more frequent revaluations (from 2023), and investment reliefs to encourage green investment and premises improvements (any increase in rates payable delayed for 12 months). These changes will affect uplift in valuations, which will be handled administratively by the Valuation Office Agency (VOA) – but will also affect local government because growth in rates will take longer to be recognised.

### 3.6 Table 1

<b>Budget assumption changes Pressure/(Benefit)</b>	<b>2022 to 2023</b>	<b>2023 to 2024</b>	<b>2024 to 2025</b>	<b>2025 to 2026</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>
<b>Budget Gap at February 2021</b>	<b>0.97</b>	<b>1.62</b>	<b>2.21</b>	<b>2.65</b>
<u>Pressures:</u>				
Review of the Council’s establishment and overall cost of employment assumptions (Includes the announced National Insurance increase for employers)	0.28	0.23	0.24	0.25
Housing benefits: Reduce rent allowances subsidy rate (recovered from Government for administering the scheme) across medium term to reflect transfer of 100% subsidy cases to Universal Credit	0.00	0.04	0.04	0.05
Insurance premiums review (including arts, culture and heritage assets and new solar for business rate changes)	0.04	0.05	0.05	0.05
Provisional increase in audit fees (to be confirmed by Public Sector Audit Authority)	0.02	0.02	0.02	0.02
<u>Improvements:</u>				
Ongoing savings relating to public access (see report CAB/WS/21/026)	(0.10)	(0.10)	(0.10)	(0.10)

Review of Council wide electricity budgets (combination of reduced usage and price inflation allowance)	(0.14)	(0.15)	(0.16)	(0.17)
Solar farm sale income- increased income assumptions after sale price for 2022 to 2023 generation has been fixed at auction. Longer term prices based on market estimates.	(0.44)	(0.07)	(0.06)	(0.06)
Increased shop rent income – linked to securing tenant beyond previous lease renewal date	(0.07)	(0.07)	(0.07)	(0.03)
Revised public sector decarbonisation savings and income generation from £2.2 million capital investment, linked to CO2 reduction plan	(0.06)	(0.06)	(0.05)	(0.05)
Industrial units: increased income assumption linked to improved performance of portfolio-linked to market rent levels and expectations	(0.04)	(0.04)	(0.04)	(0.04)
Other minor changes	(0.06)	(0.03)	(0.03)	(0.04)
<b>Remaining budget gap at November 2021</b>	<b>0.42</b>	<b>1.46</b>	<b>2.06</b>	<b>2.60</b>

- 1.4 The Performance and Audit Scrutiny Committee considered the report in detail and the key budget assumptions, and asked questions to which responses were provided. In particular the Committee discussed the solar farm additional income of £400,000 for next year and the working budget deficit for 2022 to 2023 of £0.42 million.
- 1.5 The Performance and Audit Scrutiny Committee did not raise any issues at this time to be brought to the attention of Cabinet.
- 1.6 The Performance and Audit scrutiny Committee **noted** the timescales for the 2022 to 2023 budget and medium-term plan as well as a further update being presented to the Committee on 27 January 2022.
- 1.7 The Performance and Audit Scrutiny Committee has put forward a recommendation as set out on page one of this report.

## 2. **Alternative options that have been considered**

- 2.1 Not applicable.

## 3. **Consultation and engagement undertaken**

- 3.1 See Report number: [PAS/WS/21/024](#)

#### **4. Risks associated with the proposals**

- 4.1 See Report number: [PAS/WS/21/024](#)

#### **5. Implications arising from the proposals**

- 5.1 Financial: See Report number: [PAS/WS/21/024](#)

#### **6. Appendices referenced in this report**

- 6.1 None

#### **7. Background documents associated with this report**

- 7.1 [COU/WS/21/003](#) – 23 February 2021: Budget and Council Tax Setting 2021 to 2022 and Medium-Term Financial Strategy 2021 to 2025
- 7.2 [PAS/WS/21/012](#) - 29 July 2021: 2021-22 Performance Report (Q1)
- 7.3 [PAS/WS/21/016](#) - 30 September 2021 - Delivering a Sustainable Medium-Term Budget

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# Recommendations of the Performance and Audit Scrutiny Committee: 18 November 2021: Treasury Management Report (September 2021)

<b>Report number:</b>	<b>CAB/WS/21/057</b>	
<b>Report to and date(s):</b>	<b>Cabinet</b>	7 December 2021
	<b>Council</b>	14 December 2021
<b>Cabinet member:</b>	Councillor Sarah Broughton Portfolio Holder for Resources and Property Telephone: 07929 305787 Email: <a href="mailto:sarah.broughton@westsuffolk.gov.uk">sarah.broughton@westsuffolk.gov.uk</a>	
<b>Chair of the Performance and Audit Scrutiny Committee:</b>	Councillor Ian Houlder Performance and Audit Scrutiny Committee Telephone: 07597 961069 Email: <a href="mailto:ian.houlder@westsuffolk.gov.uk">ian.houlder@westsuffolk.gov.uk</a>	
<b>Lead officer:</b>	Rachael Mann Director (Resources and Property) Telephone: 01638 719245 Email: <a href="mailto:rachael.mann@westsuffolk.gov.uk">rachael.mann@westsuffolk.gov.uk</a>	

**Decisions Plan:**

**The decision made as a result of this report will usually be published within 48 hours. This item will be referred to Council for a final decision and is, therefore, not subject to call-in. This item is included on the Decisions Plan.**

**Wards impacted:**

**All wards**

**Recommendations:      It is recommended that:**

- 1. subject to the approval of Council, the Treasury Management Report (September 2021), as contained in Report number: FRS/WS/21/005, be approved.**
- 2. The externalisation of our underlying need to borrow in order to manage the Council's interest rate risk exposure, be agreed.**

## **1. Context to this report**

### **1.1 Investment Activity 1 April 2021 to 30 September 2021**

Following the Financial Resilience Sub-Committee's consideration of Report number: [FRS/WS/21/005](#) on 8 November 2021, the Service Manager (Finance and Performance) verbally reported on the Sub-Committee's consideration of the report.

- 1.2 The Council held investments of £52,000,000 as of 30 September 2021. Interest achieved in the first half of the financial year amounted to £34,122 against a budget for the period of £22,500.
- 1.3 External borrowing as of 30 September 2021 remained at £4 million with the Council's level of internal borrowing increasing slightly to £48,039,000 as at 30 September 2021. Overall borrowing, both external and internal was expected to increase over the full financial year, but not by as much as was originally budgeted for. Borrowing costs (interest payable and Minimum Revenue Provision (MRP)) for the year were forecast to be £965,804 against an approved budget of £3,135,850, although this could change if more external borrowing was undertaken than was currently forecast.
- 1.4 The 2021 to 2022 Annual Treasury Management and Investment Strategy sets out the Council's projections for the current financial year. The budget for investment income in 2021 to 2022 was £45,000, which is based on a 0.25 percent target average interest rate of return on investments.
- 1.5 The report also included a summary of the borrowing activity during the period; borrowing strategy and sources of borrowing; borrowing and capital costs – affordability; borrowing and income – proportionality; borrowing and asset yields; Chartered Institute of Public Finance and Accountancy (CIPFA) consultation on prudential code and market information.
- 1.6 The Sub-Committee scrutinised the investment activity for 1 April 2021 to 30 September 2021, and asked questions to which responses were provided. In particular, detailed discussions were held on the Council preparing itself for external borrowing by the end of the financial year, whilst interest rates were at an historic low; and lending monies to other local authorities as set out in the report.
- 1.7 The Performance and Audit Scrutiny Committee on 18 November 2021 scrutinised the report. In particular detailed discussions were held on external borrowing and what was the Council's trigger point in borrowing externally, as inflation was on the rise and interest rates remained historically low.

1.8 The Committee suggested the Council needed to achieve interest rate certainty as soon as practicable and should be looking to lock in the low borrowing rates, externalising the Council's underlying need to borrow.

1.9 The Performance and Audit Scrutiny Committee has put forward recommendations as set out on page one and two of this report.

## **2. Alternative options that have been considered**

2.1 Not applicable.

## **3. Consultation and engagement undertaken**

3.1 Not applicable.

## **4. Risks associated with the proposals**

4.1 Not applicable.

## **5. Implications arising from the proposals**

5.1 Financial: See Report number: [FRS/WS/21/005](#)

## **6. Appendices referenced in this report**

6.1 [Appendix 1](#) - Arlingclose Economic and Interest Rate Forecast

## **7. Background documents associated with this report**

7.1 Report number: [FRS/WS/21/005](#)



# West Suffolk Local Council Tax Reduction Scheme (LCTRS): 2022 to 2023

<b>Report number:</b>	<b>CAB/WS/21/058</b>	
<b>Report to and dates:</b>	<b>Cabinet</b>	7 December 2021
	<b>Council</b>	14 December 2021
<b>Cabinet member:</b>	Councillor Sarah Broughton Portfolio Holder for Resources and Property Telephone: 07929 305787 Email: <a href="mailto:sarah.broughton@westsuffolk.gov.uk">sarah.broughton@westsuffolk.gov.uk</a>	
<b>Lead officer:</b>	Rachael Mann Director Resources and Property Telephone: 01638 719245 Email: <a href="mailto:rachael.mann@westsuffolk.gov.uk">rachael.mann@westsuffolk.gov.uk</a>  Adrian Mills Assistant Head of ARP Telephone: 07984 255437 Email: <a href="mailto:adrian.mills@angliarevenues.gov.uk">adrian.mills@angliarevenues.gov.uk</a>	

**Decisions Plan:** The decision made as a result of this report will usually be published within 48 hours. This item will be referred to Council for a final decision and is, therefore, not subject to call-in. This item is included on the Decisions Plan.

**Wards impacted:** All Wards

**Recommendations:     It is recommended that Cabinet:**

- 1.       reviews the Local Council Tax Reduction (LCTRS) Scheme for 2022 to 2023 as outlined in this report.**
- 2.       agrees to recommend to Council to make the changes to the scheme outlined in section 2 of Report number: CAB/WS/21/058, and as detailed in Appendix C.**

## 1. Context to this report

- 1.1 Each year the Council is required to review its Local Council Tax Reduction Scheme (LCTRS). This report provides an annual review of the 2021 to 2022 scheme and proposes to make changes to the scheme for 2022 to 2023.
- 1.2 We are now in the ninth year of LCTRS; a locally set scheme that replaced the previous nationally set Council Tax Benefit (CTB) scheme from April 2013.
- 1.3 In 2013 to 2014 the Council took advantage of a one-off Government grant that compensated in part for the reduction in Government funding for the working age scheme that year. This meant that the maximum LCTRS awarded was the 91.5 per cent.
- 1.4 Since then, the West Suffolk scheme has developed in the following way:

2014 to 2018	Original scheme retained, except that allowances and premiums (the amounts of income from state-administered benefits such as Job Seekers' Allowance) were increased in line with other benefits such as Housing Benefit.
2018 to 2019	The Council consulted on a proposal to harmonise the scheme with Department for Work and Pensions (DWP) welfare reforms introduced for Housing Benefit and LCTRS for pensioners and introduced closer links to Universal Credit data share for claims, thereby removing the requirement to make a separate claim. This was subsequently approved and introduced.
2019 to 2020	2018 to 2019 scheme retained.
2020 to 2021	Introduction of a fluctuating earnings rule to the treatment of Universal Credit (UC). A weekly tolerance level of £15 (£65 monthly) was introduced to reduce the number of monthly reassessments impacting customers every time a revised Universal Credit notification was received.
2021 to 2022	2020 to 2021 scheme retained

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

- 1.6 Where councils decide that they wish to amend their schemes they need to consult preceptors and stakeholders prior to a wider consultation to inform a final scheme design by 28 February of the preceding financial year.
- 1.7 The current West Suffolk Working Age LCTRS scheme provides a maximum benefit of 91.5 per cent for working age claimants and the scheme also fully protects war pensioners. The aim in designing the scheme was to achieve a balance in charging an amount of Council Tax to encourage customers back into work whilst setting the amount charged at an affordable and recoverable level during the year.
- 1.8 A separate statutory scheme applies to pensioners who can receive up to a maximum 100 per cent reduction of their Council Tax bill.
- 1.9 When reviewing the scheme in 2020 for the 2021 to 2022 year it was decided to retain the existing scheme into 2021 to 2022 as it was felt it would bring stability to customers' household budgets as they recovered or managed the impact of COVID-19. It was, however, agreed that a fuller review should be undertaken the following year to take into account learning from COVID-19, by considering a range of options for consultation, which has led to these proposals.
- 1.10 Anglia Revenues Partnership (ARP) have identified some further improvements that could be made, the main drivers for which are a streamlined customer journey; certainty and consistency of entitlement; reduced information requirements on customers; and better use of DWP and Her Majesty's Revenue and Customs (HMRC) data. These proposals are set out in section 2 of this report.
- 1.11 A portfolio holder decision was taken on 22 September 2021 to consult on the proposals. The consultation ran from 4 October to 5 November 2021. Major preceptors have responded and were content with the proposals. Four responses were received to the consultation and the key points raised are covered in section 4.1 below.

## **2. Proposals**

- 2.1 The proposed changes to the West Suffolk Local Council Tax Reduction Scheme that it is proposed should take effect from 1 April 2022 are as follows. If implemented, these changes would affect:
  - 1. the threshold for how much capital a customer can own (for example, savings) and still be entitled to a Council Tax reduction

2. the impact that living with non-dependent adult friends or family members has on the Council Tax reduction that a customer receives
3. the relationship between the application processes for Universal Credit (UC) and for Local Council Tax Reduction
4. the way in which fluctuations in a customer's earnings are taken into account in LCTRS

2.2 **Proposal 1**

It is proposed to lower the 'capital threshold' for Local Council Tax Reduction from £16,000 to £10,000 and remove the requirement to pay a tariff on savings over £6,000.

- 2.3 The capital threshold is the amount of capital (for example, savings) that a customer can own and still receive a reduction on their council tax. This proposal is intended both to ensure support is focused on those customers who most need it and also to remove the need for customers to provide evidence (where there is an over £250 change to their capital) of their capital in order for 'tariff income' to be calculated. ('Tariff income' is a measure that the Government uses for all benefits to calculate how much income a customer could theoretically earn from their capital, even if they don't earn it).

2.4 **Impact of proposal 1**

This proposal would result in:

- A simplified scheme reducing the burden on customer and evidence requirements
- Reduced number of claim adjustments as there would be no requirement to notify changes in capital of £250 or more
- More streamlined customer experience and reduced processing times for universal credit claims as tariff income details are not provided in DWP data share records

Targeting help to those most in need as those with less capital will receive increased awards and those who no longer qualify will have more than £10,000 capital.

- 2.5 Simplification would enable ARP to provide quicker decisions to customers, as the need to manually calculate tariff income would be removed. This option focuses on improved customer journey and although indicating some savings it is likely to be relatively cost neutral.
- 2.6 Modelling suggests that this proposal would have the following impact on customers:

- Customers with capital above £10,000 will no longer be entitled to LCTRS (estimated 63 individuals). This represents 91.5 per cent of every council tax band. These customers would re-enter LCTRS if their capital fell below £10,000. ARP would also have the discretion to use discretionary hardship to support individuals facing difficulties.
- Customers who gain receive on average of £61.72 more LCTRS each year ranging from £10.40 to £145.60 (estimated 13 individuals).

2.7 **Proposal 2**

It is proposed to set a fixed deduction of £7.40 on the amount of Council Tax reduction a customer on 'non-passported benefits' (see definition below) is entitled to if they live with non-dependent adult family members or friends. At the moment, the amount of deduction has to be calculated individually and can cause problems when the non-dependent family members or friends refuse to, or forget to, let the customer know about changes in their circumstances.

2.8 Non-passported benefits is a DWP term. 'Passported' means people in receipt of DWP prescribed benefits; the income-based elements of Income Support, Jobseekers Allowance and Employment Support Allowance for whom a council does not have to undertake a separate means-tested exercise and evidence gather to determine Council Tax Support or Housing Benefit. 'Non passported' means a council must undertake that separate exercise, usually because people have earnings or income exceeding those benefit thresholds. 'Passported' customers automatically receive full Council Tax Support up to the non contribution rate (91.5 per cent for West Suffolk residents) or full Housing Benefit, whilst non-passported customers will have to make some contribution towards the 91.5 per cent charge of their Council Tax; both cohorts must pay the minimum 8.5 per cent as required within West Suffolk's scheme.

2.9 The proposed change would speed up benefits claims and reduce the number of adjustments needed every time an adult household member's income changed; would provide certainty over LCTRS entitlement; and would also reduce the potential for mistakes which can lead to arrears. Customers who are entitled to a severe disability premium would not be affected by this change and would continue to be exempt from non-dependent deductions.

2.10 This proposal would result in:

- Reduced burden on customer and evidence requirements
- Reduced number of claim adjustments as there would be no requirement to notify changes in non-dependent income. This is something the customer is not always aware of or able to obtain verification of themselves

- The functionality to verify and receive automatic income updates from DWP and HMRC does not extend to non-dependents meaning verification is always a manual process and the onus is solely on the customer to identify and report changes for their adult household members
- More streamlined customer experience and quicker processing times for Universal Credit claims as DWP do not gather details of non-dependents' income and the responsibility on the Local Authority to obtain this missing information delays claim processing
- Harmonisation with Universal Credit where there is already a flat-rate non-dependent deduction

Delays in and failure to provide non-dependent income details results in incorrect LCTRS awards, often impacting Council Tax collection and arrears.

2.11 An administrative consequence of this proposal would be that ARP's ability to increase automation and provide decisions to customers in one day would be extended to those with non-dependents, as the need to request follow up details would be removed.

2.12 Modelling suggests that this proposal would have the following impact on customers:

For customers with a £7.40 deduction those that gain (around 109 people) will receive on average an additional £213.04 each year. This range is between £46.80 and £525.20. For customers with a £7.40 deduction and have reductions (around 126 people) the average decrease is £182.83 This range is between £174.20 and £522.60.

Meanwhile, there would be a much-reduced risk of incorrect LCTRS awards and arrears, due to the fixed rate.

ARP will offer the 126 customers adversely affected Emergency Hardship Payment to help bridge the gap during the first year.

2.13 **Proposal 3**

West Suffolk Council is proposing to simplify the application process for LCTRS by requiring all customers to apply to DWP rather than direct to the local authority. Whereas previously, customers submitted separate claims for LCTRS, the proposals would mean customers would in future only need to apply for benefits through DWP, who will automatically notify ARP if someone is eligible for LCTRS.

2.14 **Impact of proposal 3**

We expect this proposal will minimise customer engagement, improve speed of administration and improve processing times for customers by:

- Clarifying the customer journey by removing any confusion that a separate claim is required
- Reducing customer burden to provide evidence through making a non-UC claim
- Removing requirement for both DWP and ARP to verify same income details
- Maximising customer income by signposting customers to claim UC
- Makes full use of DWP data share functionality

There will be no financial impact on customers. Customers who complete a contact form will be advised to complete a Universal Credit application form, which will automatically trigger an application for LCTRS. There will be a fallback option where in exceptional circumstances, a customer could still apply direct to ARP.

**2.15 Proposal 4**

The council is proposing to adjust the current rule whereby customers' income can vary up to £65 a month (£15 a week) before a reassessment is required, to £100 a month. Since the £65 threshold was introduced in 2020, ARP have seen a significant reduction in adjustment notifications, direct debit amendments and refunds. It has also given customers greater certainty to enable them to manage their payments and household budgets.

2.16 A review of the current rule suggests that if the threshold was increased from £65 to £100 a month, it would further improve financial certainty for customers and streamline the process.

2.17 ARP will continue to have discretion to review exceptional cases and override the rule, however, this has not been necessary since the £65 threshold was introduced, because most cases have monthly fluctuations which even out any impact over the course of a year.

**2.18 Impact of proposal 4**

In April 2020 a tolerance rule of £65 per month was introduced which meant we no longer reassessed income changes of less than £15 per week for UC customers.

2.19 UC is designed to be paid monthly, calculated on the customer's circumstances, including Real Time Information (RTI) earnings data from HM Revenue and Customs. Given customers' circumstances, especially earnings, fluctuate, this leads to significant volumes of monthly revised UC awards sent to the Council by the DWP.

2.20 Due to the tolerance rule such customers have seen a reduction by one third in Council Tax adjustment notifications, as well as a reduction in direct debit amendments and the need to request a refund. This has provided greater certainty to customers to enable to



them to manage their payments and household budgets, with it being well received and working as expected.

- 2.21 The introduction of a fluctuating earnings rule has been particularly beneficial given the significant increase in the COVID-19 workload for Anglia Revenues Partnership, which peaked at a 500 per cent increase compared to the same point last year, before reducing to 200 per cent and now starting to return to normal levels.
- 2.22 A review of the tolerance rule suggests increasing the figure from £65 per month to £100 per month would further reduce the need for re-assessments from a third to a half, thereby providing more customers with stable payment arrangements, fewer adjustments and improved financial certainty. By retaining the discretion to review exceptional cases we will be able to override the rule in the case of a single beneficial change being reported. However, ARP are yet to see a case where discretion has been needed with the current £65 tolerance, given most cases have monthly fluctuations reported which evens out any impact of applying the tolerance over the course of a year.

### **3. Alternative options that have been considered**

- 3.1 Two further options were considered. These were a) increasing the contribution rate to more than 8.5 per cent; and b) capping LCTRS entitlement to Band D liability.
- 3.2 For both options, the possible increase in council tax collected for the Council is considered to be less than the additional costs of recovery (additional staff, postage and enquiries to customer services), including the inability to recover the debt in year by deduction from DWP benefits and therefore this is not recommended.

### **4. Consultation and engagement undertaken**

- 4.1 A short consultation exercise took place from 4 October to 5 November 2021.
- 4.2 The consultation took the form of an online survey, asking stakeholders for their views on the proposals and any unforeseen impacts. The link to the survey was sent to all councillors; made available on the Council and ARP websites; and sent to stakeholders working with individuals who are likely to be affected by the proposals or who represent residents with a protected characteristic, for example, CAB, debt and money management services and local disability groups. Major preceptors were consulted on the proposals by letter.

- 4.3 Major preceptors did not raise any objection to the proposals. Four responses were received to the online consultation. The key points raised are addressed in the table below.
- 4.4 A table of the points raised in consultation and West Suffolk Council's response is attached at Appendix A. While each of the responses received is important and helpful in ensuring the scheme is properly designed without unintended consequences, it should be noted that the points raised came from just two respondents.

## **5. Risks associated with the proposals**

- 5.1 The main risk to the Council of continuing with the current scheme is a loss in Council Tax income, if an appropriate balance is not struck between the setting of the contribution rate and the likely impact on customers' ability to pay. However, as outlined in the Alternative Options section above, it is considered that the current balance should be continued.

## **6. Implications arising from the proposals**

### **6.1 Financial**

The financial implications for customers are set out in the above sections.

The impact on Council Tax revenues is expected to be minimal. The proposals are likely to have a range of the following impacts, which are likely to offset one another in terms of their impact on overall revenue:

- Some small increases in contributions by Council Tax payers
- Some small decreases in contributions by Council Tax payers
- Some small increases in arrears where contributions are increased
- Some small decreases in arrears due to greater financial certainty
- Some small increases in Exceptional Hardship Payments
- Reductions in corrections in awards, leading to less likelihood of arrears

In each of the above cases, the number of customers affected, and therefore the revenue implications, are likely to be extremely small. The impacts will be monitored carefully throughout the year, in order to inform design of the 2023 to 2024 scheme.

Based on existing caseload the overall savings anticipated from the proposed changes is around £16,000.

**6.2 Legal Compliance**

The Council is proceeding in line with the relevant Government requirements for scheme renewal and consultation.

**6.3 Personal Data Processing**

No changes to how customers' personal data are collected and handled by West Suffolk Council are proposed.

**6.4 Equalities**

Groups representing individuals sharing a protected characteristic were sent the link to the consultation. No equalities issues were raised in response to the following consultation question: "Is there anything else you would like to tell us about these proposals, including any impacts they might have on particular groups, especially those who share a protected characteristic under the Equalities Act 2010?" An Equalities Impact Assessment is attached at Appendix B.

**6.5 Crime and Disorder**

The scheme will continue to be operated in line with the Council's and Anglia Revenues Partnership's Anti-Fraud and Anti-Corruption policies.

**6.6 Environment or Sustainability**

No impact

**6.7 HR or Staffing**

Continuing with the current scheme should minimise any additional impacts on Anglia Revenues Partnership staff.

**6.8 Changes to existing policies**

The new scheme will replace the 2021 to 2022 scheme from 1 April 2022.

**6.9 External organisations (such as businesses, community groups)**

We would not expect the proposals to have any new impacts on external organisations. No issues were raised by stakeholder groups during the consultation.

**7. Appendices referenced in this report**

7.1 Appendix A – Summary of consultation responses and West Suffolk Council responses to points raised.

7.2 Appendix B – Equalities Impact Assessment.

- 7.3 Appendix C – Draft West Suffolk Local Council Tax Reduction Scheme  
[not attached in printed form - provided as an [electronic link](#) only]

**8. Background documents associated with this report**

- 8.1 [Decision - Review of the Local Council Tax Reduction Scheme 2022-2023 and Decision to Consult \(westsuffolk.gov.uk\)](#)

## Appendix A: Responses to consultation on proposed changes to West Suffolk Local Council Tax Reduction Scheme 2022-23

	Question	Consultees' responses	West Suffolk Council response
1	<b>Proposal 1.</b> Do you agree with the proposal to lower the 'capital threshold' for Local Council Tax Reduction from £16,000 to £10,000, and remove the requirement to pay a tariff on savings over £6,000.	<p>Agree – 2, Don't know – 1, Disagree – 1</p> <p>The respondent who disagreed said:</p> <p>"This is not a high savings figure and the removal of the tariff will create a 'Cliff edge' approach"</p>	<p>This change is specifically intended to help simplify the scheme, improve the customer experience, reduce the need for reporting changes to capital of £250 or more and the burden of evidence provision. It also ensures we target help to those most in need as those with less capital will receive increased awards and those who no longer qualify will have more than £10,000 capital. As with all means tested schemes there is a level where customers' savings or income results preclude assistance. If customers savings decrease below this level £10,000 a customer may make a further claim for LCTRS assistance.</p>
2	<b>Proposal 2.</b> Do you agree with the proposal to set a fixed deduction for customers with non-dependent adult friends or family members in the same household?	<p>Agree – 2, Disagree – 1, Disagree strongly – 1</p> <p>The respondents who disagreed said:</p> <p>"This is an increase for most claimants as far as we can see"</p> <p>"From the wider document it suggests those on basic uc are not counted as passported benefits as you cant tell if they are on basic UC or have some work. This will penalise increasing numbers of</p>	<p>The proposed change would mean that around 109 customers will gain from the change (2% of claimants) and 126 will experience reductions (2.27%)</p> <p>The proposal is to retain a nil deduction for non-dependents in receipt of passported benefits (or UC with no earnings) but introduces a fixed rate deduction of £7.40 for other non-dependents.</p> <p>We would also retain the existing protections for customers in receipt of disability benefits meaning they would be exempt from any</p>

	Question	Consultees' responses	West Suffolk Council response
		uc claimants on exactly the same income as JSA claimants etc and the amounts are very hard to find each week for under 25s in particular who have very low UC. I understood those with PIP living or DLA care are exempt from non-dep deductions not just those with an SDP. SDP's are very rare as the presence of a non-dep normally leads to the removal of non-existence of a severe disability premium, is this the correct eligibility clause"	deductions (regardless of their non-dependent's circumstances):  Deductions are not made if a claimant or their partner: <ul style="list-style-type: none"> <li>• is receiving attendance allowance</li> <li>• is registered as blind</li> <li>• is receiving <u>Disability Living Allowance</u> (the care component)</li> <li>• is receiving the <u>Personal Independence Payment</u> (the daily living component)</li> </ul>
3-4	Based on data about average deductions for current claimants, the council is proposing a fixed rate deduction of £7.40 for claimants whose benefits are not 'passported'. Do you agree that this is the right amount?	Yes – 2. No – 2  The two respondents who answered No said that the amount was too high and commented as follows:  "Current amount is lower"  "it is a lot to find on those of very basic income, UC jobseekers under 25 if not passported often have income of under £50 per week once deductions and advances are taken off and to find £7.40 for their parents council tax is a lot and unfair in relation to those passported"	The nil deduction will apply to those on passported benefits including those on UC with no earnings
5	<b>Proposal 3.</b> Do you agree with the proposal to simplify the application process for	Agree – 1, Don't know – 1, Disagree – 1, Strongly disagree – 1	We are not placing any additional pressure on DWP – we already receive data for new UC claimants directly from DWP and treat

	<b>Question</b>	<b>Consultees' responses</b>	<b>West Suffolk Council response</b>
	<p>LCTRS by requiring all customers to apply to the Department for Work and Pensions (DWP) rather than direct to the local authority. Whereas previously, customers submitted separate claims for LCTRS, the proposals would mean customers would in-future only need to apply for benefits through DWP, who will automatically notify ARP if someone is eligible for the LCTRS.</p>	<p>The two respondents who disagreed said:</p> <p>"No this is not a function DWP. Responsibility LCTRS should sit with those that are charging and assessing it. DWP is too anonymous and queries re eligibility will be difficult to address. Seems too much being off loaded to DWP. Generally those that are vulnerable in some way are entitled to LCTRS and this will be yet another way for them blinded and blocked with bureaucracy"</p> <p>"I am concerned that lots of people miss out on ctr eligibility under the present system if they do not initially qualify for ctr under uc and they do not reclaim if income drops further. . People claim UC too early or before their maternity pay drops or a baby is born or have one off double wages or bonuses that nil q them for ctr and expect uc to adjust ctr the next month which it doesnt. Also this approach may lead to people claiming uc unnecessarily as many changes do not need to lead to UC and anyone can make a new claim for ctr. CTR applications should be freely available and methods of declaring changes of circumstance. Also will this work also for pensioners who are not on pension credit. If not , will there be two confusing systems for claiming ctr"</p>	<p>this as a new claim in its own right (removing the need for a duplicate claim through the local authority). This change is to help reduce the number of duplicate claims still received.</p> <p>This change will mean that we only accept new claims through the ARP website from those in receipt of legacy benefits or war pensions. Anyone else will be signposted to claim UC in the first instance or advised that they do not need to complete a form if they have claimed UC already and are waiting its outcome. The numbers ARP will be signposting are minimal with modelling showing we would only signpost around four customers each quarter and three of these would have qualified for UC so we would be helping not maximise their income.</p> <p>Anyone already in receipt of UC or who has previously made an unsuccessful claim for UC will be able to make a quick and easy re-claim through a short declaration form on the ARP website.</p> <p>There will be a fallback option where in exceptional circumstances, a customer could still apply direct to ARP.</p> <p>We will still provide customer assistance with eligibility questions.</p>

	Question	Consultees' responses	West Suffolk Council response
6	<b>Proposal 4.</b> Do you agree with the proposal to increase the threshold for income changes that affect Local Council Tax Reduction from £65 to £100?	Agree – 3, Disagree – 1  "My main query is not with the increase but it does need to be heavily publicised that you can ask for discretion if wages drop in the other direction"	
7	Anything else about the proposals.	We feel claims should last for two months of nil award as ending after one takes no account of error or blips in income.  I would be mindful of using current data only as increasing numbers will go to UC over time. Also i believe their is reduced take-up of low level ctr entitlements in the current system and these changes will bring about even fewer claims. Nil entitlement claims for ctr need to be kept open at least two months in case someone has simply had two 4 weeks payslips in a month or has claimed too early	We will have a simple online declaration that a customer can complete if they have a change in their UC which may mean they become entitled to the Local Council Tax Reduction Scheme, to enable us to review their entitlement without the need for a full fresh claim.



## Appendix B: West Suffolk Council Local Council Tax Reduction Scheme 2022-23

### Equality screening form

#### Step 1: The changes being proposed

What changes are being proposed? For example, in policy, service, charging, location.

Changes to the West Suffolk Council Local Council Tax Reduction Scheme 2022-23. The four proposed changes are as follows:

#### Proposal 1

It is proposed to lower the 'capital threshold' for Local Council Tax Reduction from £16,000 to £10,000 and remove the requirement to pay a tariff on savings over £6000.

#### Proposal 2

It is proposed to set a fixed deduction of £7.40 on the amount of Council Tax reduction a customer on 'non-passported benefits' (see definition below) is entitled to if they live with non-dependent adult family members or friends. At the moment, the amount of deduction has to be calculated individually and can cause problems when the non-dependent family members or friends refuse to, or forget to, let the customer know about changes in their circumstances.

#### Proposal 3

West Suffolk Council is proposing to simplify the application process for LCTRS by requiring all customers to apply to DWP rather than direct to the local authority. Whereas previously, customers submitted separate claims for LCTRS, the proposals would mean customers would in future only need to apply for benefits through DWP, who will automatically notify ARP if someone is eligible for LCTRS.

#### Proposal 4

The council is proposing to adjust the current rule whereby customers' income can vary up to £65 a month (£15 a week) before a reassessment is required, to £100 a month. Since the £65 threshold was introduced in 2020, ARP have seen a significant reduction in adjustment notifications, direct debit amendments and refunds. It has also given customers greater certainty to enable them to manage their payments and household budgets.

**Step 1a. Who will the changes have an impact on in general?** (For example, taxi drivers, customers, staff, owners of businesses)

**List the groups:**

Existing recipients of LCTRS

**Step 1b. What changes will each of the groups listed experience?**

**Impacts on specific groups:**

Based on modelling the proposed changes would impact those customers who have over £10,000 of savings. These customers would not qualify for LCTRS assistance.

	<p>Customers with savings of between £6,000 and £10,000 would be entitled to more LCTRS.</p> <p>The total number likely to be affected by these changes amounts to 76 customers.</p> <p>The proposed non-dependent fixed deduction change would enable customers to budget more easily because there would be less changes to customers' LCTRS entitlement.</p> <p>The total number of customers claims likely to be affected amounts to 225. Some customers will receive more LCTRS and some less based on the proposed changes.</p> <p>The increase amount within the Universal Credit tolerance rule should result in fewer adjustments to LCTRS awards.</p> <p>Both the capital and fixed deduction change will reduce the burden on the customer to provide evidence for ongoing LCTRS claims.</p>
Council tax payers not currently in receipt of LCTRS	No impact
Anglia Revenues Partnership staff	<p>The proposed changes should result in a reduction of staff time contacting customers as less evidence will be required.</p> <p>There are likely to be fewer benefit reassessments in relating to customers' savings, Universal Credit data re-assessments and non-dependent income variations.</p>
Carers and advocates of recipients of LCTRS	<p>These proposed changes do not affect this group specifically.</p> <p>These changes will reduce the burden on all customers to provide evidence in relation to changes concerning savings and adult non-dependents.</p>
Voluntary sector organisations providing advice and advocacy services	These proposed changes should result in fewer LCTRS adjustments letters in relation to capital changes, adult non-

	<p>dependents and Universal Credit data re-assessments. Customers may need less assistance with LCTRS claim changes notifications from the voluntary sector and advocacy services.</p> <p>The proposed simplification of the LCTRS claim process, the removal of having to provide evidence to both the DWP and the council should assist these services.</p> <p>The change to the claim LCTRS gateway should also help organisations help customers maximise incomes.</p>
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## Step 2: Impacts on specific groups

<p><b>Step 2a.</b> Within any of the groups you listed in Step 1, is there a <b>higher proportion of people with a protected characteristic</b> (see list below) that the populations of West Suffolk as a whole? (For example, users of Shopmobility are more likely to have a disability than the West Suffolk population)</p> <p><b>Describe how representation within the group affected differs from the West Suffolk population (use data if possible)</b></p>	<p><b>Step 2b.</b> Are there any elements of the decision or changes that will <b>impact differently</b> on people with a protected characteristic? (For example, people in rural areas with poor broadband may find it harder to access services if moved online.</p> <p><b>Describe how the change will impact differently on different groups, positively and negatively.</b></p>
<p>Recipients of LCTRS</p> <ul style="list-style-type: none"> <li>- Disability</li> </ul> <p>A greater proportion of disabled people are likely to receive council tax discount than non-disabled people, therefore the chances that the changes will negatively impact this group are higher.</p> <p>(Evidence sources: In 2016, the proportion of people without a disability in work was 79.9% and with a disability in work was 46.9%. This is a statistically significant difference. <a href="#">Department for Work and Pensions Equality Information (Customer Data) 2016 (publishing.service.gov.uk)</a></p> <p>In 2018, median pay was consistently higher for non-disabled employees than for disabled employees; in 2018, median pay for non-disabled employees was</p>	<p>The changes to the Council Tax Support Scheme may affect working age customers based on either capital, household income or Council Tax liability irrespective of disability.</p> <p>Existing protections for customers entitled to a severe disability premium would be retained meaning there would continue to be an exemption from non-dependent deductions.</p> <p>Further any applicant that cannot pay their liable council tax as a result of these changes will have access to the Exceptional Hardship fund and be treated in accordance with the Vulnerability policy.</p> <p>No mitigation is required</p>

£12.11 an hour whilst for disabled employees it was £10.63 an hour, resulting in a pay gap of 12.2% <a href="https://www.ons.gov.uk/peopleinwork/payandpensions/disabilitypaygapsintheuk">Disability pay gaps in the UK - Office for National Statistics (ons.gov.uk)</a>	
<p>Recipients of LCTRS</p> <ul style="list-style-type: none"> <li>- Age</li> </ul> <p>The proposed changes only affect working age customers.</p>	<p>The West Suffolk Council Tax Support Scheme is based in the national default scheme which was previously the Council Tax Benefit Scheme.</p> <p>The proposed changes may affect working age customers dependent on capital, household circumstances or Council Tax liability, not on the basis on age.</p> <p>Customers of pensionable age (this is defined by legislation and will change over time as the state retirement age changes upwards) will not be affected by these changes as the Government has specified that they must be protected.</p> <p>All information being published about the changes make reference to the changes only affecting working age customers. Households with children and young adults at school will continue to be supported by Child Benefit and maintenance being ignored in calculation Council Tax Support assessments.</p>
<p>Marriage and civil partnership:</p> <p>No evidence that the population in receipt of LCTRS has higher representation from individuals with protected characteristics under this strand.</p>	<p>The changes to the Council Tax Support Scheme may affect working age customers based on either capital, household income or Council Tax liability irrespective of marital or civil partnership status.</p> <p>No mitigation is required</p>
<p>Pregnancy and maternity:</p> <p>No evidence that the population in receipt of LCTRS has higher representation from individuals with protected characteristics under this strand.</p>	<p>The changes to the Council Tax Support Scheme may affect working age customers based on either capital, household income or Council Tax liability. There is no impact in relation to pregnancy and maternity. Applicable amounts and premiums remain unchanged.</p> <p>No mitigation required.</p>
Race:	The changes to the Council Tax Support Scheme may affect working age

<p>No evidence that the population in receipt of LCTRS has higher representation from individuals with protected characteristics under this strand.</p>	<p>customers based on either capital, household income or Council Tax liability There is no impact in relation to race of a person. Council Tax Support is a means tested benefit, race is not a factor of the scheme.</p> <p>No mitigation required.</p>
<p>Gender reassignment:</p> <p>No evidence that the population in receipt of LCTRS has higher representation from individuals with protected characteristics under this strand.</p>	<p>The changes to the Council Tax Support Scheme may affect working age customers based on either capital, household income or Council Tax liability irrespective of a person's gender reassignment.</p> <p>No mitigation is required.</p>
<p>Religion or belief:</p> <p>No evidence that the population in receipt of LCTRS has higher representation from individuals with protected characteristics under this strand.</p>	<p>The changes to the Council Tax Support Scheme may affect working age customers based on either capital, household income or Council Tax liability. There is no impact in relation to religion or belief of a person.</p> <p>No mitigation required.</p>
<p>Sex:</p> <p>No evidence that the population in receipt of LCTRS has higher representation from individuals with protected characteristics under this strand.</p>	<p>The changes to the Council Tax Support Scheme may affect working age customers based on either capital, household income or Council Tax liability. There is no impact in relation to the sex of person.</p> <p>No mitigation required.</p>
<p>Sexual orientation:</p> <p>No evidence that the population in receipt of LCTRS has higher representation from individuals with protected characteristics under this strand.</p>	<p>The changes to the Council Tax Support Scheme may affect working age customers based on either capital, household income or Council Tax liability. There is no impact in relation to sexual orientation of a person.</p> <p>No mitigation required.</p>
<p>Deprivation/Socioeconomic Disadvantage:</p> <p>A greater proportion of people on low incomes will receive council tax discount, therefore the chances that the changes will negatively impact this group are higher.</p>	<p>The changes to the Council Tax Support Scheme may affect working age customers based on either capital, household income or Council Tax liability. These proposed charges will result in some customers receiving more Council Tax Support and some receiving less. The proposed changes aim to target assistance to those customers who have under £10,000 capital and reduce the evidence requirement burden for</p>

	<p>customers. In addition, the proposed changes aim to provide stable payment arrangements and provide financial certainty by applying a standard rate nondependent deduction and increasing the amount used within the Universal Credit tolerance rule.</p> <p>Mitigation.</p> <p>To continue with the discretion to review exceptional cases to override the Universal Credit tolerance rule in the case of a single beneficial change being reported.</p> <p>Any applicant who cannot pay their liable council tax as a result of these changes will have access to the Exceptional Hardship fund and be treated in accordance with the Vulnerability policy.</p>
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### Step 3: Adjustments to the proposals

<p><b>Step 3a.</b> What are the views of the changes from those who are affected by them and what (if any) amendments would they like to see? Please note this engagement should precede formal consultation. For example, what do charities think of proposed changes to business rates relief?</p> <p><b>Record any feedback on the proposals that has been gathered</b></p>	<p><b>Step 3b.</b> Based on the feedback from 3a, can we alter the proposed changes so that the negative impacts are removed or reduced and the positive impacts maximised? For example, adjust eligibility criteria to exclude small charities from changes.</p> <p><b>What changes could be made to the proposals? If none, say why not.</b></p> <p><b>How can we ensure the proposals are communicated effectively to those affected?</b></p>
Appendix A to Cabinet paper which gives details of feedback received	No changes required
All consultations were conducted formally but included stakeholders and customers.	Effective communication of all of the changes will be required, including through the groups contacted as part of the consultation exercise.

**West Suffolk Council is committed to assessing the impact of our proposals on those with a protected characteristic** (that is age, disability, sex, pregnancy or maternity, marriage or civil partnership, race, religion, sexual orientation and gender re-assignment, as well as on families and those with caring responsibilities, people on

low income, people suffering rural isolation and those for whom English is not their first language).

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# Housing priorities: progress update

<b>Report number:</b>	<b>CAB/WS/21/059</b>	
<b>Report to and date:</b>	<b>Cabinet</b>	7 December 2021
<b>Cabinet members:</b>	<p>Sara Mildmay-White Portfolio Holder for Housing and Strategic Health Telephone: 01359 270580 Email: <a href="mailto:sara.mildmay-white@westsuffolk.gov.uk">sara.mildmay-white@westsuffolk.gov.uk</a></p> <p>Andy Drummond Portfolio Holder for Regulatory and Environment Telephone: 01638 751411 Email: <a href="mailto:andy.drummond@westsuffolk.gov.uk">andy.drummond@westsuffolk.gov.uk</a></p> <p>Susan Glossop Portfolio Holder for Growth Telephone: 01284 728377 Email: <a href="mailto:susan.glossop@westsuffolk.gov.uk">susan.glossop@westsuffolk.gov.uk</a></p> <p>David Roach Portfolio Holder for Planning Telephone: 01440 768966 Email: <a href="mailto:david.roach@westsuffolk.gov.uk">david.roach@westsuffolk.gov.uk</a></p>	
<b>Lead officers:</b>	<p>Julie Baird Director (Planning and Growth) Telephone: 01284 757613 Email: <a href="mailto:julie.baird@westsuffolk.gov.uk">julie.baird@westsuffolk.gov.uk</a></p> <p>Jennifer Eves Director (HR, Governance and Regulatory) Telephone: 01284 757015 Email: <a href="mailto:jennifer.eves@westsuffolk.gov.uk">jennifer.eves@westsuffolk.gov.uk</a></p> <p>Davina Howes Director (Families and Communities) Telephone: 01284 757070 Email: <a href="mailto:davina.howes@westsuffolk.gov.uk">davina.howes@westsuffolk.gov.uk</a></p>	

<b>Decisions Plan:</b>	<b>The decision made as a result of this report will usually be published within 48 hours and cannot be actioned until five clear working days of the publication of the decision have elapsed. This item is included on the Decisions Plan</b>
<b>Wards impacted:</b>	<b>All wards</b>
<b>Recommendation:</b>	<b>It is recommended that, Cabinet:</b> <ol style="list-style-type: none"><li><b>1. approves an addendum to the Housing Strategy 2018-2023, as set out in Appendix A of Report number: CAB/WS/21/059</b></li><li><b>2. approves that the life of the Housing Strategy be extended to 2024</b></li><li><b>3. approves the revised Housing Strategy Implementation Plan, as set out in Appendix B of Report number: CAB/WS/21/059</b></li><li><b>4. notes progress against the Housing Delivery Action Plan (Appendix C)</b></li><li><b>5. notes progress against the Homelessness Reduction and Rough Sleeping Strategy Delivery Plan (Appendix D)</b></li></ol>

## 1. Context to this report

- 1.1 A review of the [Housing Strategy and Implementation Plan](#) has been undertaken during 2021, with progress against actions having been regularly carried out since it was adopted in 2018. Updates on progress against the [Housing Delivery Action Plan](#) and [Homelessness Reduction and Rough Sleeping Delivery Plan](#) have also been undertaken regularly since they were first adopted by Cabinet.

- 1.2 The opportunity is being taken to present the documents to Cabinet together in one report, setting out a progress update against our housing priorities. Details are provided in the report below and attached appendices.

### **The impact of working towards our housing priorities**

- 1.3 We know that good housing plays an important role in improving health and wellbeing of people in our area, and it is vital to realising our ambitions for economic growth. We are taking a proactive approach to supporting and promoting housing delivery within the district and to identifying housing need in the area, whether that be affordable housing or planning for accessible and adaptable homes. We have exceeded our housing delivery target of 95 per cent and delivered 112 per cent of the housing required in the Government's housing delivery test for the year 2020 to 2021, including 297 affordable homes. Through the local plan process our aim is to make sure that the right kind of homes are provided in the right places. This means that more people are being supported to access the housing they need to fulfil their future ambitions.
- 1.4 The standard of housing across the private rented sector is another area of focus and by working with landlords and tenants we are working hard to ensure people live in decent homes that can improve quality of life. We are also working with the most vulnerable households to improve energy efficiency standards and help those in fuel poverty live in warmer homes.
- 1.5 The Independent Living Suffolk service was established in December 2020 which helps people to live safely and independently in their own homes by putting adaptations in place through the delivery of Disabled Facilities Grants (DFG). The new service is working incredibly well compared to grants previously progressed through Orbit. It demonstrates the positive impact of introducing the fast-track DFG which has reduced the waiting time for adaptations by 50 per cent. Through the new service we have approved 107 DFGs in 2021 to 2022 (to date) compared with 72 in 2020 to 2021. The average time to complete a mandatory DFG has also reduced from 40 to 24 weeks for the same time period.
- 1.6 Since March 2020, 196 individuals have been accommodated through the government's 'everyone in' initiative which asked that local authorities secure accommodation for all rough sleepers to protect

them during pandemic. We have built on this approach and secured funding from a range of sources to help rough sleepers to access the support and accommodation they need to move towards sustainable accommodation and enjoy settled lives. Between 1 January and 30 September 2021, 1126 households have been provided with housing advice and support and we continue to have high homelessness prevention rates, which means more people are being supported to remain in their own homes when faced with homelessness. As the current situation constantly evolves through recovery from the pandemic, we are responding to households' needs as a result of the end of the moratorium on evictions at the end of May 2021, the end of furlough in September 2021 and the end of the Universal Credit uplift.

### **Looking to the future**

- 1.7 As set out in the appendices to this report, there remains a huge amount of work to be done. Housing affordability remains a big challenge in the local area, and recent events mean that households are facing more challenges than ever in terms of finding and sustaining tenancies that enable them to live full and settled lives. The Council remains committed to addressing these issues through the actions set out in the action plans described in the remainder of this report, which have now been refreshed to ensure they remain current and able to address the challenges faced.
- 1.8 We will continue to be proactive in our role as a local housing and planning authority, a regulator, an investor and local influencer to achieve our priorities for housing in West Suffolk. We will work with government, respond to consultations and drive change.
- 1.9 We continue to report regularly on progress against the Housing Strategy and the Homelessness Reduction and Rough Sleeping Strategy. The Housing Delivery Action Plan has now largely been completed with some action still ongoing.

## **2. Proposals within this report**

### **Addendum to the Housing Strategy and updated Implementation Plan**

- 2.1 The [Housing Strategy and Implementation Plan](#) was adopted by Cabinet in December 2018. As is good practice, regular reviews have been carried out since then. Cabinet considered a [year one review](#) of the Housing Strategy Implementation Plan in May 2020, which set out progress and focused on future priorities.
- 2.2 A mid-term review has been undertaken this year. As a result, an addendum to the Housing Strategy is attached as Appendix A to this report and the revised Implementation Plan is attached as Appendix B (access via electronic [link](#) only).

- 2.3 The addendum provides an update to the Housing Strategy 2018-2023. It sets out significant policy changes and events that have taken place since the Housing Strategy was first adopted, details the revised Implementation Plan and recommends that the life of the Housing Strategy be extended to 2024.
- 2.4 The actions in the Housing Strategy are progressed through the Implementation Plan (Appendix B to this report) that identifies the main tasks needed to increase and improve the provision of appropriate housing over the life of the strategy. As part of the mid-term review, we looked in detail at the actions contained in the Implementation Plan. It was concluded that the housing priorities remain relevant, however, some changes have been made to the actions and these have been detailed at Appendix B.

### **Progress against the Housing Delivery Action Plan**

- 2.5 The Council commissioned a Housing Delivery Study in 2018. The study set out actions that can be taken to boost overall housing delivery and provide greater choice in the types and tenures of new homes. This sits alongside the government's requirement that local authorities undertake a housing delivery test to understand whether they are delivering the required number of homes.
- 2.6 West Suffolk Council achieved a 105 per cent rate of delivery, against a target of 95 percent. Given this rate of delivery it was not a requirement to adopt an action plan, however, the Council agreed to take a proactive approach to housing delivery by preparing an action plan that is aligned to the Housing Strategy.
- 2.7 The progress made towards increasing housing delivery across West Suffolk is detailed at Appendix C (access via electronic [link](#) only) and many of the actions have now been completed.

### **Progress against the Homelessness Reduction and Rough Sleeping Strategy delivery plan**

- 2.8 In October 2019, Cabinet considered a [report](#) detailing progress against the delivery plan. This was formerly the Homelessness Reduction Strategy, however, actions to address rough sleeping were included following a government requirement. The Homelessness Reduction and Rough Sleeping Strategy was adopted in 2019.
- 2.9 The coronavirus pandemic has presented challenges to our work with rough sleepers and those threatened with homelessness. However, it has also created the opportunity to support and accommodate former rough sleepers in innovative new ways as we work towards pathways to sustainable accommodation. Appendix D attached (access via electronic [link](#) only) sets out progress towards delivering against the delivery plan.

### **3. Alternative options that have been considered**

- 3.1 To continue with the Housing Strategy and Implementation Plan, the Housing Delivery Action Plan and Homelessness Reduction and Rough Sleeping Strategy. This means that we would not be ensuring that the documents remain relevant and fit for purpose. We would also not have an understanding of the progress made, the priorities we need to focus on moving forward and any barriers that we need to unblock.

### **4. Consultation and engagement undertaken**

- 4.1 The Housing Strategy and Homelessness Reduction and Rough Sleeping Strategy were the subject of public and stakeholder consultation through a workshop and online survey. It was not necessary to consult on the mid-term review of the Housing Strategy.
- 4.2 The Housing Delivery Action Plan was produced following the [Housing Delivery Study](#) which was the subject of consultation by the consultants, Turley Economics.

### **5. Risks associated with the proposals**

- 5.1 Housing priorities not aligned with future housing needs across West Suffolk.

### **6. Implications arising from the proposals**

- 6.1 Equalities
- 6.1.1 Equality Impact Assessments (EqIAs) were completed for the Housing Strategy and the Homelessness Reduction and Rough Sleeping Strategy and it was not necessary to carry out EqIAs on the reviews.
- 6.2 Changes to existing policies
- 6.2.1 The Housing Strategy has not changed; however, an addendum has been prepared by way of an update since the Housing Strategy was first adopted in 2018.

### **7. Appendices referenced in this report**

- 7.1 Appendix A: Addendum to the Housing Strategy (**attached**)  
Appendix B: Revised Housing Strategy Implementation Plan (**access via electronic [link](#) only**)  
Appendix C: Progress against the Housing Delivery Action Plan (**access via electronic [link](#) only**)

Appendix D: Progress against the Homelessness Reduction and Rough Sleeping Strategy Delivery Plan  
(access via electronic [link](#) only)

## **8. Background documents associated with this report**

- 8.1 [West Suffolk Strategic Framework 2020-2024](#)  
[Housing Strategy and Implementation Plan 2018-2023](#)  
[Housing Delivery Action Plan](#)  
[Homelessness Reduction and Rough Sleeping Strategy 2018-2023](#)

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## West Suffolk Housing Strategy and Implementation Plan 2018-2023: addendum

### 1. Introduction

- 1.1 The [Housing Strategy and Implementation Plan](#) was adopted by Cabinet in December 2018. Since then, regular reviews of progress have been undertaken. This addendum sets out a formal review of the strategy taking into account progress made, ensuring the actions remain relevant and fit for purpose and the current situation in relation to housing post-pandemic.
- 1.2 The actions in the Housing Strategy are progressed through the [Implementation Plan](#) that identifies the main tasks that the council will take to help increase and improve the provision of appropriate housing over the life of the strategy.
- 1.3 As set out in the strategy, and as is good practice, we committed to reviewing the actions to ensure they remain relevant and are revised where appropriate. We have therefore undertaken this mid-term review to ensure we respond to the housing needs and continue to progress our housing priorities.

### 2. Our vision and housing priorities

- 2.1 [West Suffolk's Strategic Framework 2020-2024](#) sets out our vision for the local area and contains strategic priorities that we are committed to in order to deliver this vision. Our strategic priority that specifically focuses on housing is to provide:

**Increased and improved provision of appropriate housing in West Suffolk in both our towns and rural areas.**

- 2.2 Through the process of this mid-term review, our understanding of the local context and external pressures, we have determined that the priorities set out in the Housing Strategy 2018-2023 remain relevant, in order to deliver this strategic priority.
- 2.3 The 2020-24 West Suffolk Strategic Framework included a slightly amended set of housing priorities, as follows, but the Housing Strategy continues to support these, in a similar way to the priorities in place when the Strategy was adopted in 2018:

We will use our roles as a local housing and planning authority, a regulator, an investor and local influencer to:

- ensure a variety of new housing is provided in appropriate locations, that meets the needs of current and future generations
- improve the quality of housing and the local environment for our residents
- support people in accessing suitable housing, including by working in partnership to address their wider needs.

- 2.4 Further information about the review of our actions to deliver against these priorities is set out in section 4 of this document.

### **3. Changes since the Housing Strategy 2018-2023 was adopted**

#### **3.1 Coronavirus pandemic**

- 3.1.1 The coronavirus pandemic has had a significant impact on people's everyday lives and businesses globally and the housing sector and construction industry have not been immune to this.
- 3.1.2 Through our ongoing commitment to housing delivery, West Suffolk Council has an important role in recovery and will provide focus for our continued dialogue with the housing market and partners as the situation continues to evolve.

#### **3.2 The Suffolk-wide approach to recovery following the coronavirus pandemic**

- 3.2.1 During 2020 to 2021 Suffolk's Public Sector, including West Suffolk Council, worked together to agree a strategic approach for how Suffolk will recover from the coronavirus pandemic. Suffolk Public Sector Leaders' priorities are physical and mental health, town centres, housing and homelessness, young people and climate and environment. Through this commitment, the aim is to improve outcomes for all Suffolk people and to reduce inequalities.
- 3.2.2 The proposals are focused around collaborative work to maximise benefits and will sit alongside individual organisations' plans to support recovery among Suffolk residents and businesses and capitalising on available resources.

#### **3.3 Net zero carbon emissions by 2030**

- 3.3.1 In June 2020, West Suffolk Council agreed a net zero emissions target for its operations, to be achieved by 2030. We also need to address the need to improve energy efficiency in housing and we will continue to respond to government policy and work with developers, registered providers and private landlords as we work towards this.
- 3.3.2 West Suffolk is a partner in the [Suffolk Climate Emergency Plan](#) that contains specific goals that we have adopted around reducing carbon emissions in the housing sector. In West Suffolk, we are developing plans to:
- Ensure higher energy performance in new build homes (all new builds should be zero carbon by 2025) through the development of the West Suffolk Local Plan and by working with developers.
  - Home built under the Future Homes Standard should produce 75 to 80 per cent fewer carbon emissions compared with current levels and become net zero as the electricity grid continues to decarbonise.

**We will access funding alongside our Suffolk partners to:**

- Work with registered providers and private home-owners to improve their homes with energy efficiency measures;
- Enforce the Domestic Minimum Energy Efficiency Standard regulations which requires privately rented properties to have an Energy Performance Certificate E or better; and
- Bid for funding through the Green Homes Grant Local Authority Delivery (LAD) scheme to improve the efficiency of low-income households.

3.3.3 The West Suffolk Local Plan is due to be adopted in July 2024. We are developing policies so that we can work with developers and homeowners to design proposals and make decisions about more energy efficient housing as we respond to the climate change agenda. As we develop the Local Plan this will provide the context for the development of more detailed planning guidance.

### **3.4 Housing Needs Assessment**

3.4.1 A Housing Needs Assessment was adopted by the Cambridgeshire and West Suffolk district councils in 2021.

3.4.2 The assessment provides an understanding of West Suffolk's current and future housing market and how it relates to our housing growth and needs. It indicates how West Suffolk will respond to population increases through housing growth. It provides evidence to support the preparation of Local Plans, Neighbourhood Plans, and planning policies relating to the needs of groups with specific housing requirements to inform policy for the delivery of housing in West Suffolk between 2020 and 2040.

3.4.3 In particular, the assessment makes recommendations around the need for affordable housing, including social rent, the type of housing mix required, the needs of older and disabled persons, people who rent their homes, people who want to build their own homes and service families. Actions will be developed from the Housing Needs Assessment which ensure the council is focused on meeting the needs of our communities now and in the future.

### **3.5 Planning for the Future white paper**

3.5.1 The white paper was published in August 2020 along with a consultation on the proposals. We responded to the consultation and are preparing for what the proposed changes could mean for West Suffolk.

3.5.2 These reforms to the planning system aim to speed up the rate of delivery of new housing and modernise the planning system. The key changes are around the following areas:

- Planning for development
- Planning for beautiful and sustainable places
- Planning for infrastructure and connected places

3.5.3 As government's plans develop, we will continue to be proactive and press government on what this will mean for West Suffolk.

**4. Housing Strategy and Implementation Plan: mid-term review**

- 4.1 A review of the Housing Strategy and Implementation Plan has taken place throughout 2021. This has involved detailed discussions with services and staff from across the council.
- 4.2 The Housing Strategy priorities remain appropriate and relevant. They continue to provide future direction as we take into account the new challenges we are facing around the coronavirus pandemic, the net zero carbon emissions target and Planning for the Future White Paper.
- 4.3 The Implementation Plan (attached as Appendix B) has also been subject to a thorough review. We have looked in detail at each action to understand impacts and as a result whether it is still relevant and fit for purpose. We have also assessed how we should continue to report progress, whether any actions have been completed or should be combined and if they can be reported through other mechanisms.
- 4.4 The revised Implementation Plan sets out the actions that we are working towards in order to deliver against our priorities. The plan includes commentary around how we will move forward with our actions following the review. The actions that will be removed, and why they are being removed, are also set out in the plan. There are minor wording changes to some of the actions in order to improve clarity.
- 4.5 In order to streamline our reporting practices and to utilise existing reporting mechanisms, the Implementation Plan contains detail around certain actions being reported through alternative routes in the future. The reporting routes are detailed in section 5 below.
- 4.6 Following this review we are also proposing that the Housing Strategy should be extended to 2024. This means the Housing Strategy will be aligned with the Strategic Framework 2020-2024. Also, a new Housing Strategy beyond 2024 will commence at the same time as the West Suffolk Local Plan which is due to be adopted in 2024. However, we will continue to monitor any new government policy, such as the Planning for the Future White Paper, and assess whether an earlier review might be necessary.
- 4.7 We are also taking this opportunity to reflect on our progress against the Housing Strategy 2018-2023 and the challenges we face, as set out at 4.9 and 4.10 below.
- 4.8 Detailed information about how we are working to prevent and reduce homelessness and rough sleeping is set out in the West Suffolk Council [Homelessness Reduction and Rough Sleeping Strategy](#), attached as Appendix D to the Cabinet report with details of the delivery plan review. The council's Housing Strategy does not therefore contain specific actions to a reduce homelessness however there is a clear link between both strategies.

### Progress to date

4.9 We have made significant **progress** in a number of areas. The implementation plan contains detailed information and some key activities are listed below:

- Exceeded our Housing Delivery Test target of 95 per cent and achieved 112 per cent for the year 2020-21;
- Adoption of a Housing Delivery Action Plan (despite meeting our Housing Delivery Test target) in order to maintain our proactive approach to housing delivery which will enable more development where we want to meet local need;
- Continued progress on our commitment to develop a West Suffolk Local Plan by 2024. The next stage is consultation of preferred options in March 2022;
- Housing Needs Assessment finalised. This provides an understanding of the amount and type of housing that is needed across West Suffolk;
- Working towards the requirement that 25 per cent of all affordable homes delivered are First Homes, a type of discounted market sale housing;
- Barley Homes (council owned housing development company) has completed a development at Westmill Place in Haverhill and a Stonemill Park in Haverhill is due to be completed in early 2022;
- Build to Rent is being proactively progressed as an option to help meet local housing need;
- The Independent Living Suffolk (ILS) is in place which is a service provided by Suffolk County Council in partnership with local district and borough councils. Through this new model, in place since December 2020, local people are being supported to live safely, comfortably and independently in their own home for as long as possible;
- Continuing to improve standards in the private rented sector through innovative new ways of working with tenants and landlords;
- Providing effective advice, preventative and information services which has resulted in high homelessness prevention and relief rates and accommodating 196 individuals through the 'everyone in' initiative; and
- The Lettings Policy review has been completed with a revised and fit for purpose policy adopted across the Cambridge sub-region in summer 2021.

### Challenges

4.10 West Suffolk Council faces some **challenges** in achieving the priorities set out in the Housing Strategy. A number of these are outside of our direct control but we continue to liaise with and influence our partners. We are working to address challenges in the following areas:

- Increasing the rate of housing delivery. We are taking a proactive approach to exploring new ways of increasing the rate of housing delivery and being more creative in encouraging new types of housing that meets the current and future needs of our residents;
- Delivering the right amount of affordable housing to meet local needs, including social rented properties;
- Understanding the level of need around adapted accommodation and undertaking an assessment of accommodation currently available;
- Working with partners to reduce the number of empty homes which will provide more accommodation for those in housing need and improve these to a higher energy efficiency standard;
- Working with developers to achieve the Future Homes Standard by 2025 to ensure that all new homes are carbon zero-ready;
- Improve energy efficiency in existing housing by working with registered providers, the private rented sector and privately owned home-owners;

### **5. Reporting against our housing priorities**

- 5.1 We will use the following reporting mechanisms to evidence progress, and help us understand barriers, to deliver against our priorities.

#### **5.2 Housing Delivery Action Plan**

- 5.2.1 The council commissioned a Housing Delivery Study, published in March 2019, which informed West Suffolk's Housing Strategy and the [Housing Delivery Action Plan](#). The study set out a wide range of interventions that West Suffolk can use in an enabling role to increase the rate of housing delivery on existing and emerging sites and local plan housing allocations. It includes actions that can be taken to boost overall housing delivery and provide greater choice in the types and tenures of new homes.
- 5.2.2 Increasing the rate of housing delivery is a key priority in our Housing Strategy with actions included in the Implementation Plan. These actions have been monitored through the Housing Delivery Action Plan and remain a priority in the Housing Strategy.
- 5.2.3 Our approach supports government policy, where a target was set to deliver 300,000 new homes annually across the United Kingdom by the mid-2020s. Local authorities as well as central Government need to understand whether the required number of new houses are being delivered. As such, a Housing Delivery Test was introduced in July 2018 to measure local authority performance against central government set targets.
- 5.2.4 We recognise that we will need to deliver housing in partnership with both the private sector and other public sector partners, in order to speed up the rate of housing delivery, in the short, medium and long-term.

### **5.3 Climate Change and Environment Taskforce Action Plan**

- 5.3.1 West Suffolk Council declared a climate emergency and established a taskforce to help move forward with initiatives put in place to tackle climate change and reduce greenhouse gases. Our ambition is to reach net zero carbon emissions by 2030.
- 5.3.2 The taskforce focused on five main themes that includes housing (and planning). An [action plan](#) was developed that sets out a range of initiatives such as identifying rental properties that fail Minimum Energy Efficiency Standards (MEES) and ensuring properties are brought up to standards as well as using the local plan process to improve the environmental performance of new homes.

### **5.4 Rural Taskforce Action Plan**

- 5.4.1 Cabinet established this taskforce with a view to ensuring that the different issues facing residents, communities and businesses in more rural areas are taken into account by the council in all of its relevant future activities and decision making.
- 5.4.2 Following an engagement exercise, the taskforce identified three themes to focus on which included Appropriate and Affordable Housing. As West Suffolk Council develops the new local plan, the taskforce identified a number of actions to take forward as part of the plan such as space standards, design standards, housing mix and tenure, and sustainable heating solutions.

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### Decisions Plan

#### Key decisions and other executive decisions to be considered

**Date: 1 December 2021 to 31 March 2022**

**Publication date: 5 November 2021**

The following plan shows both the key decisions and other decisions/matters taken in private, that the Cabinet, portfolio holders, joint committees or officers under delegated authority, are intending to take up to 31 May 2022. This table is updated on a monthly rolling basis and provides at least 28 clear days' notice of the consideration of any key decisions and of the taking of any items in private.

Executive decisions are taken at public meetings of the Cabinet and by other bodies/individuals provided with executive decision-making powers. Some decisions and items may be taken in private during the parts of the meeting at which the public may be excluded, when it is likely that confidential or exempt information may be disclosed. This is indicated on the relevant meeting agenda and in the 'Reason for taking the item in private' column relevant to each item detailed on the plan.

Members of the public may wish to:

- make enquiries in respect of any of the intended decisions listed below; or
- receive copies of any of the documents in the public domain listed below; or
- receive copies of any other documents in the public domain relevant to those matters listed below which may be submitted to the decision taker; or
- make representations in relation to why meetings to consider the listed items intended for consideration in private should be open to the public.

In all instances, contact should be made with the named officer in the first instance, either on the telephone number listed against their name, or via email using the format [firstname.surname@westsuffolk.gov.uk](mailto:firstname.surname@westsuffolk.gov.uk) or via West Suffolk Council, West Suffolk House, Western Way, Bury St Edmunds, Suffolk, IP33 3YU or Mildenhall Hub, Sheldrick Way, Mildenhall, Suffolk IP28 7JX.

<b>Expected decision date</b>	<b>Subject and purpose of decision</b>	<b>Reason for taking item in private (see Note 1 for relevant exempt paragraphs)</b>	<b>Decision (D), Key Decision (KD) or Rec (R) to Council on date  (see Note 2 for Key Decision definitions)</b>	<b>Decision taker (see Note 3 for membership)</b>	<b>Portfolio holder contact details</b>	<b>Lead officer contact details</b>	<b>Documents to be submitted</b>
Page 82	<b>Council Tax Technical Changes 2022 to 2023</b> This item has been removed from the Decisions Plan as there is no decision to make. There are no Council Tax Technical Changes for the 2022 to 2023 year.				Sarah Broughton Resources and Property 07929 305787	Rachael Mann Director (Resources and Property) 01638 719245	
07/12/21  (deferred from 09/11/21)	<b>Local Council Tax Reduction Scheme 2022 to 2023</b> The Cabinet will be asked to consider proposals for potential revisions to the Local Council Tax Reduction Scheme prior to	Not applicable	(R) – Council 14/12/21	Cabinet/ Council	Sarah Broughton Resources and Property 07929 305787	Rachael Mann Director (Resources and Property) 01638 719245	Report to Cabinet with recommendations to Council.

Expected decision date	Subject and purpose of decision	Reason for taking item in private (see Note 1 for relevant exempt paragraphs)	Decision (D), Key Decision (KD) or Rec (R) to Council on date  (see Note 2 for Key Decision definitions)	Decision taker (see Note 3 for membership)	Portfolio holder contact details	Lead officer contact details	Documents to be submitted
	seeking its approval by Council.						
07/12/21 Page 83	<b>Delivering a Sustainable Budget 2022 to 2023 and Medium Term Financial Strategy 2022 to 2026</b> The Cabinet will be asked to consider recommendations of the Performance and Audit Scrutiny Committee for recommending to Council on proposals for achieving a sustainable budget in 2022 to 2023 and in the medium term.	Not applicable	(R) – Council 14/12/21	Cabinet/ Council	Sarah Broughton Resources and Property 07929 305787	Rachael Mann Director (Resources and Property) 01638 719245	Recommendations of the Performance and Audit Scrutiny Committee to Cabinet and Council.

Expected decision date	Subject and purpose of decision	Reason for taking item in private (see Note 1 for relevant exempt paragraphs)	Decision (D), Key Decision (KD) or Rec (R) to Council on date  (see Note 2 for Key Decision definitions)	Decision taker (see Note 3 for membership)	Portfolio holder contact details	Lead officer contact details	Documents to be submitted
07/12/21  Page 84	<b>Financial Resilience Report – September 2021</b> The Cabinet will be asked to consider the recommendations of the Performance and Audit Scrutiny Committee regarding seeking approval for the Financial Resilience activities between 1 April 2021 and 30 September 2021.	Not applicable	(R) – Council 14/12/21	Cabinet / Council	Sarah Broughton Resources and Property 07929 305787	Rachael Mann Director (Resources and Property) 01638 719245	Recommendations of the Performance and Audit Scrutiny Committee to Cabinet and Council.
07/12/21	<b>Revenues Collection Performance and Write Offs</b> The Cabinet will be asked to consider writing-off outstanding	Exempt appendices: paragraphs 1 and 2	(KD)	Cabinet	Sarah Broughton Resources and Property 07929 305787	Rachael Mann Director (Resources and Property) 01638 719245	Report to Cabinet with exempt appendices.

Expected decision date	Subject and purpose of decision	Reason for taking item in private (see Note 1 for relevant exempt paragraphs)	Decision (D), Key Decision (KD) or Rec (R) to Council on date  (see Note 2 for Key Decision definitions)	Decision taker (see Note 3 for membership)	Portfolio holder contact details	Lead officer contact details	Documents to be submitted
	debts, as detailed in the exempt appendices.						
07/12/21 (new) 85	<b>Housing Priorities: Progress Update</b> Following a detailed review, the Cabinet will be asked to approve and/or note the following in relation to Housing, one of the Council's key strategic priorities:  1. an addendum to the Housing Strategy 2018-2023 and that its life be extended to 2024	Not applicable	(D)	Cabinet	Sara Mildmay-White Housing and Strategic Health 01359 270580  Andy Drummond Regulatory and Environment 07710 027343  Susan Glossop Growth 01284 728377	Julie Baird Director (Planning and Growth) 01284 757613  Jen Eves Director (HR, Governance and Regulatory) 01284 757015  Davina Howes Director (Families and Communities) 01284 757070	Report to Cabinet with several appendices attached.

Expected decision date	Subject and purpose of decision	Reason for taking item in private (see Note 1 for relevant exempt paragraphs)	Decision (D), Key Decision (KD) or Rec (R) to Council on date  (see Note 2 for Key Decision definitions)	Decision taker (see Note 3 for membership)	Portfolio holder contact details	Lead officer contact details	Documents to be submitted
Page 86	2. the revised Housing Strategy Implementation Plan  3. note progress against the Housing Delivery Action Plan  4. note progress against the Homelessness Reduction and Rough Sleeping Strategy Delivery Plan.				David Roach Planning 07889 510003		
07/12/21  (new)	<b>Barley Homes Business Plan 2021</b> The Cabinet will be asked to consider a new business plan for Barley Homes and	Exempt appendices: paragraph 3	(KD)  This could potentially lead to a recommend-	Cabinet (and potentially Council)	Sara Mildmay-White Housing and Strategic Health 01359 270580	Julie Baird Director (Planning and Growth) 01284 757613	Report to Cabinet with exempt appendices, with potential recommendations to Council.

Expected decision date	Subject and purpose of decision	Reason for taking item in private (see Note 1 for relevant exempt paragraphs)	Decision (D), Key Decision (KD) or Rec (R) to Council on date  (see Note 2 for Key Decision definitions)	Decision taker (see Note 3 for membership)	Portfolio holder contact details	Lead officer contact details	Documents to be submitted
Page 87	potential associated funding requests. Although it is anticipated to be a key decision of Cabinet, this may require a recommendation to Council for approval.		ation to Council on 14/12/21, depending on whether a significant increase in budget is required.				
07/12/21 (new)	<b>Arrangements for the Appointment of External Auditors for West Suffolk Council</b> The Cabinet will be asked to consider and recommend to Council, the recommendations of the Performance and Audit Scrutiny Committee in respect	Not applicable	(R) – Council 14/12/21	Cabinet / Council	Sarah Broughton Resources and Property 07929 305787	Rachael Mann Director (Resources and Property) 01638 719245	Recommendations of the Performance and Audit Scrutiny Committee to Cabinet and Council.

Expected decision date	Subject and purpose of decision	Reason for taking item in private (see Note 1 for relevant exempt paragraphs)	Decision (D), Key Decision (KD) or Rec (R) to Council on date  (see Note 2 for Key Decision definitions)	Decision taker (see Note 3 for membership)	Portfolio holder contact details	Lead officer contact details	Documents to be submitted
Page 88	of the proposed arrangements for appointing external auditors to audit the accounts of West Suffolk Council. Such arrangements include the consideration of whether West Suffolk Council should 'opt in' to the Public Sector Audit Appointments (PSAA) audit regime.						
08/02/22 (deferred from 11/01/22)	<b>Applications for Community Chest 2022 to 2023</b> The Cabinet will be asked to consider the recommendations of	Not applicable	(KD); however, some funding allocations may be	Cabinet	Robert Everitt Families and Communities 01284 769000	Davina Howes Director (Families and Communities) 01284 757070	Recommendations of the West Suffolk Grant Working Party to Cabinet.



Expected decision date	Subject and purpose of decision	Reason for taking item in private (see Note 1 for relevant exempt paragraphs)	Decision (D), Key Decision (KD) or Rec (R) to Council on date  (see Note 2 for Key Decision definitions)	Decision taker (see Note 3 for membership)	Portfolio holder contact details	Lead officer contact details	Documents to be submitted
Page 89	the West Suffolk Grant Working Party in respect of the levels of funding (if any) to be awarded to applicants to the Community Chest funding scheme for 2022 to 2023 and in some cases, 2023 to 2024.		subject to the budget setting process.				
08/02/22	<b>Delivering a Sustainable Budget 2022 to 2023 and Medium Term Financial Strategy 2022 to 2026</b> The Cabinet will be asked to consider recommendations of	Not applicable	(R) – Council 22/02/22  Unless separate proposals are recommended by	Cabinet	Sarah Broughton Resources and Property 07929 305787	Rachael Mann Director (Resources and Property) 01638 719245	Recommendations of the Performance and Audit Scrutiny Committee to Cabinet and Council.

Expected decision date	Subject and purpose of decision	Reason for taking item in private (see Note 1 for relevant exempt paragraphs)	Decision (D), Key Decision (KD) or Rec (R) to Council on date  (see Note 2 for Key Decision definitions)	Decision taker (see Note 3 for membership)	Portfolio holder contact details	Lead officer contact details	Documents to be submitted
Page 90	the Performance and Audit Scrutiny Committee for recommending to Council on proposals for achieving a sustainable budget in 2022 to 2023 and in the medium term.		Cabinet, consideration by Council will take place as part of the separate budget setting paper on 22/02/22				
08/02/22	<b>Budget and Council Tax Setting 2022 to 2023 and Medium Term Financial Strategy 2022 to 2026</b> The Cabinet will be asked to consider the proposals for the 2021 to 2022 budget and	Not applicable	(R) – Council 22/02/22  Unless separate proposals are recommended by Cabinet,	Cabinet/ Council	Sarah Broughton Resources and Property 07929 305787	Rachael Mann Director (Resources and Property) 01638 719245	Report to Cabinet with recommendations to Council.

Expected decision date	Subject and purpose of decision	Reason for taking item in private (see Note 1 for relevant exempt paragraphs)	Decision (D), Key Decision (KD) or Rec (R) to Council on date  (see Note 2 for Key Decision definitions)	Decision taker (see Note 3 for membership)	Portfolio holder contact details	Lead officer contact details	Documents to be submitted
Page 91	Medium Term Financial Strategy 2022 to 2026 for West Suffolk Council, prior to its approval by Council. This report includes the Minimum Revenues Provision (MRP) Policy and Prudential Indicators.		consideration by Council will take place as part of the separate budget setting paper on 22/02/22				
08/02/22	<b>Financial Resilience - Strategy Statement 2022 to 2023 and Treasury Management Code of Practice</b> The Cabinet will be asked to recommend to Council, approval of	Not applicable	(R) – Council 22/02/22	Cabinet/ Council	Sarah Broughton Resources and Property 07929 305787	Rachael Mann Director (Resources and Property) 01638 719245	Recommendations of the Performance and Audit Scrutiny Committee to Cabinet and Council.

Expected decision date	Subject and purpose of decision	Reason for taking item in private (see Note 1 for relevant exempt paragraphs)	Decision (D), Key Decision (KD) or Rec (R) to Council on date  (see Note 2 for Key Decision definitions)	Decision taker (see Note 3 for membership)	Portfolio holder contact details	Lead officer contact details	Documents to be submitted
Page 92	the Strategy Statement 2022 to 2023 and Treasury Management Code of Practice for West Suffolk Council, which must be undertaken before the start of each financial year.						
08/02/22	<b>Financial Resilience Report – December 2021</b> The Cabinet will be asked to consider the recommendations of the Performance and Audit Scrutiny Committee regarding seeking approval for the Financial Resilience	Not applicable	(R) – Council 22/02/22	Cabinet / Council	Sarah Broughton Resources and Property 07929 305787	Rachael Mann Director (Resources and Property) 01638 719245	Recommendations of the Performance and Audit Scrutiny Committee to Cabinet and Council.

Expected decision date	Subject and purpose of decision	Reason for taking item in private (see Note 1 for relevant exempt paragraphs)	Decision (D), Key Decision (KD) or Rec (R) to Council on date  (see Note 2 for Key Decision definitions)	Decision taker (see Note 3 for membership)	Portfolio holder contact details	Lead officer contact details	Documents to be submitted
	activities between 1 April 2021 and 31 December 2021.						
15/03/22 Page 93	<b>Revenues Collection Performance and Write Offs</b> The Cabinet will be asked to consider writing-off outstanding debts, as detailed in the exempt appendices.	Exempt appendices: paragraphs 1 and 2	(KD)	Cabinet	Sarah Broughton Resources and Property 07929 305787	Rachael Mann Director (Resources and Property) 01638 719245	Report to Cabinet with exempt appendices.

## **Note 1: Definition of exempt information and relevant paragraphs of the Local Government Act 1972**

### **In accordance with Section 100(A)(4) of the Local Government Act 1972 (as amended)**

The public may be excluded from all or part of the meeting during the consideration of items of business on the grounds that it involves the likely disclosure of exempt information defined in Schedule 12(A) of the Act, as follows:

1. Information relating to any individual.
2. Information which is likely to reveal the identity of an individual.
3. Information relating to the financial or business affairs of any particular person (including the authority holding that information).
4. Information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or office holders under, the authority.
5. Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.
6. Information which reveals that the authority proposes –
  - a. to give under any enactment a notice under or by virtue of which requirements are imposed on a person; or
  - b. to make an order or direction under any enactment.
7. Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

### **In accordance with Section 100A(3) (a) and (b) of the Local Government Act 1972 (as amended)**

Confidential information is also not for public access, but the difference between this and exempt information is that a Government department, legal opinion or the court has prohibited its disclosure in the public domain. Should confidential information require consideration in private, this will be detailed in this Decisions Plan.

## Note 2: Key decision definition

A key decision is an executive decision that either:

- a. Results in new expenditure, or a reduced income or savings of more than £100k in any one year that has not otherwise been included in the Council's revenue or capital budgets.
- b. Comprises or includes the making, approval or publication of a draft or final scheme, which is not a routine business decision, that may require, either directly or in the event of objections, the approval of a Minister of the Crown.
- c. Results in the formation of a new company, limited liability partnership or joint venture.
- d. Has a potentially detrimental impact on communities outside of West Suffolk District.
- e. Is a decision that is significant in terms of its effect on communities living or working in a definable local community in the District, or on one or more wards, in that it will:
  - i. Have a long-term, lasting impact on that community; or
  - ii. Restrict the ability of individual businesses or residents in that area to undertake particular activities; or
  - iii. Removes the provision of a service or facility for that community; or
  - iv. Increases the charges payable by members of the community to provide a service or facility by more than 5%; or
  - v. Have the potential to create significant local controversy or reputational damage to the Council
- f. A matter that the decision maker considers to be a key decision.
- g. Any matters that fall under the scope of e. above must be subject to consultation with the local Member(s) in Wards that are likely to be impacted by the decision prior to the decision being made.

### **Note 3: Membership of bodies making key decisions**

#### **a. Membership of West Suffolk Council's Cabinet and their portfolios**

<b>Cabinet Member</b>	<b>Portfolio</b>
John Griffiths	Leader of the Council
Sara Mildmay-White	Deputy Leader of the Council and Housing and Strategic Health
Sarah Broughton	Portfolio Holder for Resources and Property
Carol Bull	Portfolio Holder for Governance
Andy Drummond	Portfolio Holder for Regulatory and Environment
Robert Everitt	Portfolio Holder for Families and Communities
Susan Glossop	Portfolio Holder for Growth
Jo Rayner	Portfolio Holder for Leisure, Culture and Community Hubs
David Roach	Portfolio Holder for Planning
Peter Stevens	Portfolio Holder for Operations



**b. Membership of the Anglia Revenues Partnership Joint Committee (made up of Breckland Council, East Cambridgeshire District Council, East Suffolk Council, Fenland District Council and West Suffolk Council)**

<b>Member Council</b>	<b>Full representative</b>	<b>Substitute representative</b>
Breckland	Philip Cowen	Sam Chapman-Allen and Paul Claussen
East Cambridgeshire	David Ambrose-Smith	David Brown and Joshua Schumann
East Suffolk	Maurice Cook	To be confirmed
Fenland	Jan French	David Connor and Kim French
West Suffolk	Sarah Broughton	Sara Mildmay-White

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# Revenues Collection Performance and Write-Offs

<b>Report number:</b>	<b>CAB/WS/21/061</b>	
<b>Report to and date:</b>	<b>Cabinet</b>	7 December 2021
<b>Cabinet member:</b>	Sarah Broughton Portfolio Holder Resources and Property Telephone: 07929 305787 Email: <a href="mailto:sarah.broughton@westsuffolk.gov.uk">sarah.broughton@westsuffolk.gov.uk</a>	
<b>Lead officer:</b>	Rachael Mann Director (Resources and Property) Telephone: 01638 719245 Email: <a href="mailto:rachael.mann@westsuffolk.gov.uk">rachael.mann@westsuffolk.gov.uk</a>	

**Decisions Plan:** The decision made as a result of this report will usually be published within 48 hours and cannot be actioned until five clear working days of the publication of the decision have elapsed. This item is included on the Decisions Plan but is no longer a Key Decision as previously advised.

**Wards impacted:** All wards

**Recommendation:** It is recommended that the write-off of the amounts detailed in the Exempt Appendices to Report number: CAB/WS/21/061, be approved, as follows:

- 1. Exempt Appendix 1: Council Tax totalling £5,918.07**
- 2. Exempt Appendix 2: Business Rates totalling £37,868.71**
- 3. Exempt Appendix 3: Housing Benefit Overpayment totalling £25,257.78**

## 1. Context to this report

- 1.1 The Revenues Section collects outstanding debts in accordance with either statutory guidelines or Council agreed procedures.
- 1.2 When all these procedures have been exhausted the outstanding debt is written off using the delegated authority of the Director, Resources and Property for debts up to £4,999.99 or by Cabinet for debts over £5,000.
- 1.3 It is best practice to monitor the recovery procedures for outstanding debts regularly and, when appropriate, write off irrecoverable debts.
- 1.4 Provision for irrecoverable debts is included both in the Collection Fund and the General Fund and writing off debts that are known to be irrecoverable ensures that staff are focussed on achieving good collection levels in respect of the recoverable debt.
- 1.5 As at 31 October 2021, the Council Tax percentage of debt written off during 2021 to 2022 for all previous years is 0.30 percent.
- 1.6 As at 31 October 2021, the business rates percentage of debt written off during 2021 to 2022 for all previous years is 0.20 percent.

## 2. Proposals within this report

- 2.1 To review the current revenue collection performance and to consider writing off outstanding debts, as detailed in the exempt appendices.
- 2.2 Provision is made in the accounts for non-recovery but the total amounts to be written off are as follows with full details shown in **Exempt Appendix 1 for Council Tax totalling £5,918.07; Exempt Appendix 2 for Business Rates totalling £37,868.71 and Exempt Appendix 3 for Housing Benefit Overpayment totalling £25,257.78.**
- 2.3 As at 1 April 2021, the total National Non-Domestic Rates (NNDR) billed by Anglia Revenues Partnership (ARP) on behalf of West Suffolk Council (as the billing Authority) is £42.8 million per annum. The collection rate as at 31 October 2021 was 60.29 percent against a profiled target of 60.12 percent.
- 2.4 It should be noted that reliefs introduced by central Government in response to the COVID-19 pandemic (many of which provided 100 percent relief for 2020 to 2021) have been extended to the end of June 2021 at which point the remainder of the year will be discounted

by 66 percent. Any accounts eligible will be rebilled in July 2021 for an increased amount which will adjust the net collectable debt.

- 2.5 As at 1 April 2021, the total Council Tax billed by Anglia Revenues Partnership on behalf of West Suffolk Council (includes the County Council, Police and Parish precept elements) is £104.9 million per annum. The collection rate as at 31 October 2021 was 65.18 percent against a profiled target of 64.93 percent.
- 2.6 West Suffolk residents seeking support with paying their council tax because of the impact of the COVID-19 pandemic were offered the opportunity to reprofile their payment plans for 2020 to 2021. This has had the effect of moving some recovery activity into 2021 to 2022 where final instalments were set very late in the financial year

### **3. Alternative options that have been considered**

- 3.1 There is an extensive and supportive recovery process prior to the engagement of an enforcement agency. The Council currently uses the services of the ARP Enforcement Agency to assist in the collection of business rates and Council Tax and also has on-line tracing facilities. Although this service was suspended during the lockdown and up to more recently, enforcement is now reinstated in line with government guidance. It is not considered appropriate to pass the debts on to another agency.
- 3.2 It should be noted that in the event that a written-off debt becomes recoverable, the amount is written back on, and enforcement procedures are re-established. This might happen, for example, if someone has gone away with no trace, and then they are unexpectedly 'found' again, through whatever route.

### **4. Consultation and engagement undertaken**

- 4.1 Leadership Team and the Portfolio Holder for Resources and Property have been consulted with on the proposed write-offs.

### **5. Risks associated with the proposals**

- 5.1 Low Risk - Debts are written off which could have been collected  
Control - Extensive recovery procedures are in place to ensure that all possible mechanisms are exhausted before a debt is written off.

Medium Risk – Impact of the COVID-19 pandemic on recovery of debts and the increase in bankruptcies, IVA, CVA's are likely to impact this years' collection rates. Close monitoring is taking place and support provided where possible.

## **6. Implications arising from the proposals**

- 6.1 Financial as above
- 6.2 Legal Compliance
  - the recovery procedures followed have been previously agreed; writing off uncollectable debt allows staff to focus recovery action on debt which is recoverable.
- 6.3 Personal Data Processing
  - no changes to the way we process personal data.
- 6.4 Equalities
  - the application of predetermined recovery procedures ensures that everybody is treated consistently.
  - failure to collect any debt impacts on either the levels of service provision or the levels of charges.
  - all available remedies are used to recover the debt before write-off is considered.
  - the provision of services by the Council applies to everyone in the area.
- 6.5 Crime and Disorder – not applicable
- 6.6 Environment or Sustainability – not applicable
- 6.7 HR or Staffing– not applicable
- 6.8 Changes to existing policies – not applicable
- 6.9 External organisations (such as businesses, community groups)  
No significant implications on 6.1 to 6.8 as a result of this report

## **7. Appendices referenced in this report**

- 7.1 Exempt Appendix 1 – Council Tax  
Exempt Appendix 2 – Business Rates  
Exempt Appendix 3 – Housing Benefit Overpayment

## **8. Background documents associated with this report**

- 8.1 None

# Barley Homes: Business Plan 2021

<b>Report number:</b>	<b>CAB/WS/21/062</b>	
<b>Report to and date:</b>	<b>Cabinet</b>	7 December 2021
<b>Cabinet member:</b>	Councillor Sara Mildmay-White Portfolio Holder for Housing and Strategic Health Telephone: 01359 270580 Email: <a href="mailto:sara.mildmay-white@westsuffolk.gov.uk">sara.mildmay-white@westsuffolk.gov.uk</a>	
<b>Lead officer:</b>	Julie Baird Director (Planning and Growth) Telephone: 01284 757613 Email: <a href="mailto:julie.baird@westsuffolk.gov.uk">julie.baird@westsuffolk.gov.uk</a>	

**Decisions Plan:** The decision made as a result of this report will usually be published within 48 hours and cannot be actioned until five clear working days of the publication of the decision have elapsed. This item is included on the Decisions Plan.

**Wards impacted:** All wards

**Recommendations:** It is recommended that Cabinet:

1. notes the progress update for Barley Homes and steps outlined in this report to secure its medium term pipeline of sites.
2. Approves the Barley Homes Business Plan 2021, attached as Exempt Appendix A to Report number: CAB/WS/21/062.

## **1. Context to this report**

- 1.1 Each year Barley Homes Limited, the Council's wholly owned Housing Company, produces its annual business plan setting out its development plans for the forthcoming year and medium term against the investment facility made available to it. The total investment facility now available to Barley Homes Limited is a £14.25 million revolving loan/equity facility funded through a mixture of capital receipts (which supports the equity element) and the Investing in our Growth Agenda fund.
- 1.2 Since the Business Plan was approved by Council in December 2020, as reported via the Annual Report 2020 (on the [Barley Homes website](#)) the company has made good progress in achieving its aims and progressed the sites set out in its Business Plan at Stonemill Park (formerly Castle Hill) and Westmill Place (formerly Westfield), Haverhill, for the delivery of 63 homes, of which 19 are affordable. All homes at Westmill Place were completed during the summer of 2021 and sold with residents moving in shortly afterwards and throughout September and October. Stonemill Park has progressed well with homes being available on the market in early 2022.
- 1.4 Following the agreement of the 2020 business plan, progress has been made on the two new sites identified at that time, at School Lane, Great Barton and Kingshall Street, Rougham. We are also continuing to explore options to deliver at College Heath Road at Mildenhall.
- 1.5 A number of future sites are being explored by Barley Homes and the Council as part of the ongoing process of supplying Barley Homes with a viable development pipeline. A viable development pipeline will enable Barley Homes to continue to utilise the agreed £14.25m investment fund which then provides financial returns to the Council through loan interest receipts and dividend payments. The annual business planning process has not highlighted a need to revise the total investment fund. As there is no further funding required for the investment fund for Barley Homes, the approval of the 2021 business plan sits as an executive function of the Cabinet.
- 1.6 **The purpose of this report**
  - 1.6.1 The propose of this report is to present the 2021 Business Plan to Cabinet for agreement. The Business Plan outlines the progress with the committed sites and associated financial implications.



## **2. Proposals within this report**

### **2.1 The development of the Business Plan 2021**

- 2.1.1 The proposed business plan (Exempt Appendix A) focuses on Barley Homes' completion of the development of Stonemill Park, Haverhill as well as work to bring forward the site at Kingshall Street, Rougham. It also outlines the work the Council and Barley Homes is engaged with to progress the sites at School Lane, Great Barton and College Heath Road, Mildenhall.
- 2.1.2 This work has been set in the context of the Council's strategic framework and Medium-Term Financial Strategy (MTFS).
- 2.1.3 In presenting the 2021 Business Plan, officers developed a set of appraisal criteria in order to evaluate potential sites (as referenced in the Cabinet report CAB/WS/019/41, paragraphs 3.16 and 3.17). Sites are selected based on this criteria and then progressed within the Business Plan. This appraisal criteria continued to be used for potential new pipeline sites assessed throughout 2021 to ensure there is a consistent approach. Barley Homes and the Council are continuing to work up a number of sites, at this stage no additional named pipeline sites have been added to the business plan however this position may change as sites are appraised. The Shareholder Advisory Group will consider the addition of new named sites joining the business plan during the course of the year against that appraisal criteria, so long as their inclusion enables Barley Homes peak debt to remain within the overall agreed £14.25 million investment fund available.
- 2.1.4 The 2020 Business Plan identified we were undertaking detailed work for College Heath Road at Mildenhall to refine the numbers, next steps and timescales. Whilst progress has since been made, we are still exploring options for how Barley Homes might achieve the best outcomes on this site. Excluding CHR at this stage, the three sites in the Business Plan including Stonemill Park will generate a steady build out rate, delivering (subject to the planning process) 79 homes between November 2021 and 2024 to 2025.

### **2.2 Land assembly and planning**

- 2.2.1 The Mildenhall site is currently in the ownership of both West Suffolk Council and Suffolk County Council. West Suffolk Council has progressed with land assembly, as set out in the 2021 Business Plan the site is now in ownership of West Suffolk Council and Suffolk County Council with the former NHS site now in West Suffolk ownership. We are in the process of exploring funding opportunities,

as well as working with the Market to facilitate delivery of a policy compliant development on this site.

- 2.2.2 The parcel of land at Great Barton totaling 1.91 hectares came into West Suffolk Council ownership in February 2021.

The Council has progressed pre-planning work for this parcel of land, which has been allocated in the former St Edmundsbury adopted Local Plan. This has been progressed in parallel with work on the adjacent “triangle” site with Suffolk County Council.

Representations were made to the Great Barton Neighbourhood Plan which has now been adopted by West Suffolk Council following the community referendum (22 June 2021).

Work is now progressing on the Development Brief, which the Neighbourhood Plan Inspector identified will be key in defining the total amount of housing which can be delivered on both sites. The Development Brief will be assessed against the local and neighbourhood plans. Further engagement with stakeholders and the local community will shape the outcomes for this site as part of the Development Brief process. Barley Homes will pursue planning for approximately 40 houses on the purchased 1.91 hectare site. This will be done in parallel with Suffolk County Council to prepare a Development Brief. The Development Brief will help provide continuity across both development sites.

- 2.2.3 The Council has progressed with the purchase of the site in Rougham and is currently working on the exchange of contracts anticipated for November 2021. The site has outline planning permission for up to 13 units and is approximately 1.8 acres (0.74 hectares)

- 2.2.4 In addition to these sites, present opportunities being evaluated include sites emerging from the one public estate programme; sites for sale on the open market, and sites which have not been developed yet or may have stalled.

## 2.3 **Financial implications for West Suffolk Council**

- 2.3.1 The likely interest receivable on the loans to Barley Homes will be assessed and factored into the Council’s financial plans as part of the annual budget setting process for 2022 to 2023 and across the medium term, taking into account the already assumed one percent return from the Investing in our Growth Agenda fund.

- 2.3.2 It has been previously agreed that any dividend income (profit distribution) would only become part of the Council’s medium term financial plans once there is greater certainty on the returns to be achieved from Barley Homes as sites progress. This position has

been reached for the two Haverhill sites and budget assumptions will be updated as part of the 2022-23 budget setting process.

2.3.3 The investment for the delivery of the two initial Haverhill sites, plus the pipeline sites and the expected returns to be achieved are summarised in section 6.2 of the Barley Homes Business Plan (Exempt Appendix A). It is important to note that all of the figures contained in the business plan are based on the current modelling including desk top appraisals so there may be variations in both the costs and receipts in the final scheme delivery, as planning is sought and a contractor is procured. A sensitivity and risk analysis for Barley Homes has been undertaken and is included within the Business Plan (sections 10.3).

2.3.4 The total investment facility required by Barley Homes over the next five years has not changed since previous agreed levels as a result of this Business Plan. This total investment facility would allow Barley Homes to cover its peak funding requirement, as well as allowing for any cash flow risk through a contingency for slippage in sales or build out rates.

2.3.5 As detailed in the Business Plan (and previous Business Plans) all of the development loan funding will be repaid by Barley Homes. As highlighted above, the Council funds Barley Homes through a mixture of loans (debt) and shareholdings (equity). The current level of equity that West Suffolk has in Barley Homes is £600,100. For clarity, the equity elements of the investment facilitates delivery of the Business Plan and supports the viability of Barley Homes as a standalone company but does not generate an annual financial return for the Council in its own right. It is reflected as an asset in West Suffolk Council's balance sheet.

2.3.6 In the previous Business Plan 2020, West Suffolk allocated an additional revenue budget of £60,000 giving a total budget of £410,000 to facilitate the spend required to gain planning permission on the allocated sites, along with feasibility appraisals on further pipeline sites. There will be no requirement for additional revenue funding for the 2021 business plan. Any additional revenue funding to support further pipeline sites during the year over and above the allocation provided will be considered from the revenue Investing in our Growth Agenda reserve under delegation.

## 2.4 **Operational and governance implications for West Suffolk Council**

2.4.1 As part of the ongoing management of the company Barley Homes will make arrangements to review its operational processes over the next few months. This will ensure that it continues to be fit for purpose. It was expected to review this position in 2020, however it

recommended we undertake this in 2021 to 2022 as we move towards recovery with COVID 19 and any impacts from this and Brexit are more certain.

- 2.4.2 Meanwhile the company will continue to operate under the established day-to-day operating model and governance structure for Barley Homes. The expectations in terms of the working relationship between the Council and Barley Homes are contained in the Business Plans 2018, 2019 and 2020.
- 2.4.3 Unfortunately, due to the coronavirus restrictions, it was not feasible to hold the Barley Homes AGM this year, however a copy of the company's annual report was made available to members. Otherwise, the governance arrangements continue to reflect recognised good practice.

### **3. Alternative options that have been considered**

- 3.1 The exempt business plan sets out how Barley Homes, working with the Council, has evaluated potential development opportunities. Opportunities that do not meet the criteria, based on the principles set out in 2.1.2 and 2.1.3 above, and the evaluation method established in the 2019 report CAB/WS/19/041 have been discounted.

### **4. Consultation and engagement undertaken**

- 4.1 The proposals within this report have been developed in consultation with the Shareholder Advisory Group, namely the Leader of Council, Portfolio Holder for Housing and Strategic Health, and Portfolio Holder for Resources and Property. Their meetings are attended by the Chair of Overview and Scrutiny Committee and the Chair of Performance and Audit Scrutiny Committee.

### **5. Risks associated with the proposals**

- 5.1 A formal risk assessment is provided in Appendix B, house prices and build costs remain a significant risk to any housing development, and thus the Council's ability to obtain a financial return from Barley Homes. Similarly, the impact of COVID-19, proposed changes to planning policy, current market conditions and the exit from the European Union remain a risk and will need to be monitored closely.
- 5.2 Local, regional and national trends are frequently monitored to evaluate potential changes and how these may impact on costs and levels of returns achievable from developments. Should a significant negative change in trend emerge, options will be assessed to

evaluate the way forward and if necessary, further reports provided on the recommended way forward.

## **6. Implications arising from the proposals**

### **6.1 Crime and disorder**

Bringing empty brownfield sites can play a role in managing anti-social behaviour. Although there were no known current risks with the sites in this context.

### **6.2 HR / Staffing**

As part of its Investing in Growth Agenda, the Council has invested in resources who have the expertise to develop a housing pipeline. As appropriate Barley Homes commission required in-house skills by service level agreement.

### **6.3 Impact on other organisations (for example, community groups, businesses, partner organisations)**

It is envisaged that local communities and parish councils will be engaged as part of the planning and development processes.

Where necessary consultation with community groups will shape the development.

## **7. Appendices referenced in this report**

7.1 Exempt Appendix A: Barley Homes Business Plan 2021

7.2 Appendix B: West Suffolk Council Risk Assessment

## **8. Background documents associated with this report**

8.1 Business Case for Establishment of a Housing Development Company:

[COU/SE/15/031](#) (SEBC)

[COU/FH/15/036](#) (FHDC)

8.2 Barley Homes – 5 year business plan:

[OAS/SE/16/028](#) (SEBC)

[OAS/FH/16/030](#) (FHDC)

8.3 Barley Homes Group Annual Report 2018:

[OAS/SE/18/004](#) (SEBC)

[OAS/FH/18/004](#) (FHDC)

[Barley Homes Group Annual Report 2019](#)

[Barley Homes Group Annual Report 2020](#)

- 8.4 Barley Homes Interim Business Plan 2018:  
[CAB/JT/18/032](#) (Joint Executive (Cabinet) Committee)
- 8.5 Barley Homes Business Plan 2019:  
[CAB/WS/19/041](#) (Cabinet)
- 8.6 Barley Homes Business Plan 2020:  
[CAB/WS/20/079](#) (Cabinet)

## Appendix B Risk Assessment: Barley Homes Business Plan 2021

<b>Risk area</b>	<b>Inherent level of risk</b> (before controls)	<b>Controls</b>	<b>Residual risk</b> (after controls)
Increased exposure to risks associated with Barley Homes by virtue of investment growth fund, when combined with external shock factors such as (Covid-19 and Brexit) create additional pressures on the deliverability of the Council's budget	High	The current Covid-19 crisis has created increased pressure on the Council's budget and necessitated the use of general fund reserves in order to support the achievement of a balanced budget. A prudent approach has been taken to the recognition of revenue from Barley Homes, to ensure that the Council's budget are not under undue pressure should the risks below in relation to Barley Homes materialise.	Medium
Assumptions in the Business Plan are not achievable or realistic	High	The revised values have been produced based on independent advice received by the Council (This has been updated using latest construction cost and market value estimates) alongside additional external advice commissioned by West Suffolk Council, including cost Consultants and valuation services. Given the nature of the housing market, the risks associated are inherently high, however regular reviews of development appraisals will be carried out by the council and Barley Homes to monitor the overall risk level, as the scheme progress through planning and development.	Medium

Insufficient regular monitoring of performance of Barley Homes against Business Plan by shareholders	Medium	<p>The governance arrangements for Barley Homes are now well established, in particular robust quarterly reviews of progress through to the Shareholder Advisory Group.</p> <p>West Suffolk Council have an officer responsible for liaison with Barley Homes directors and working closely with them to ensure Barley Homes are meeting their targets.</p>	Low
Uncertainty over costs and income in the housing market, particularly in light of Brexit mean the Business Plan is not achievable	High	<p>Sensitivity analysis undertaken during the appraisal stage giving fluctuation market values.</p> <p>Also see risk section of Barley Homes Business plan</p>	Medium
Further viability challenges emerge on sites or difficulty with land assembly mean sites cannot be delivered	High	The Council will seek to explore options to develop sites where such challenge emerges, for example seeking funding from external sources to resolve viability challenges or compulsory purchase to ensure sites are developed	Medium



Changes in public sector borrowing rates or government policy towards local authority investment mean anticipated returns cannot be achieved	Medium	The Council is working with the LGA to lobby government to ensure that any further changes to public sector rates are minimised. Potential alternative funding such as the Municipal Borrowing Agency would be explored if necessary. The treasury have indicated that they intend to review local authority investment activity however no announcements have been made.	Medium
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