

Cabinet

Title	Agenda																								
Date	Tuesday 23 July 2024																								
Time	6.00 pm																								
Venue	Conference Chamber West Suffolk House Western Way Bury St Edmunds																								
Membership	<table> <tr> <td>Leader</td> <td>Cliff Waterman</td> </tr> <tr> <td>Deputy Leader</td> <td>Victor Lukaniuk</td> </tr> <tr> <td>Councillor</td> <td>Portfolio</td> </tr> <tr> <td>Donna Higgins</td> <td>Families and Communities</td> </tr> <tr> <td>Diane Hind</td> <td>Resources</td> </tr> <tr> <td>Gerald Kelly</td> <td>Governance and Regulatory</td> </tr> <tr> <td>Richard O'Driscoll</td> <td>Housing</td> </tr> <tr> <td>Ian Shipp</td> <td>Leisure</td> </tr> <tr> <td>David Taylor</td> <td>Operations</td> </tr> <tr> <td>Jim Thorndyke</td> <td>Planning</td> </tr> <tr> <td>Cliff Waterman</td> <td>Leader</td> </tr> <tr> <td>Indy Wijenayaka</td> <td>Growth</td> </tr> </table>	Leader	Cliff Waterman	Deputy Leader	Victor Lukaniuk	Councillor	Portfolio	Donna Higgins	Families and Communities	Diane Hind	Resources	Gerald Kelly	Governance and Regulatory	Richard O'Driscoll	Housing	Ian Shipp	Leisure	David Taylor	Operations	Jim Thorndyke	Planning	Cliff Waterman	Leader	Indy Wijenayaka	Growth
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Interests – declaration and restriction on participation	Members are reminded of their responsibility to declare any disclosable pecuniary interest, other registerable or non-registerable 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.																								
Quorum	Four Members																								
Committee administrator	Claire Skoyles Democratic Services Officer Telephone 01284 757176 Email democratic.services@westsuffolk.gov.uk																								

Public information



Venue	Conference Chamber, West Suffolk House, Western Way, Bury St Edmunds IP33 3YU
Contact information	Telephone: 01284 757176 Email: democratic.services@westsuffolk.gov.uk Website: www.westsuffolk.gov.uk
Access to agenda and reports before the meeting	The agenda and reports will be available to view at least five clear days before the meeting on our website.
Attendance at meetings	<p>This meeting is being held in person in order to comply with the Local Government Act 1972. 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.</p> <p>As a local authority, we have a corporate and social responsibility for the safety of our staff, our councillors and visiting members of the public. We, therefore, request that you exercise personal responsibility and do not attend the meeting if you feel at all unwell.</p> <p>West Suffolk Council continues to promote good hygiene practices with hand sanitiser and wipes being available in the meeting room. Attendees are also able to wear face coverings, should they wish to</p>
Public participation	<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. We 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.</p> <p>There is an overall time limit of 15 minutes for public speaking, which may be extended at the Chair's discretion.</p>
Accessibility	If you have any difficulties in accessing the meeting, the agenda and accompanying reports, including for reasons of a

	<p>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.</p>
Recording of meetings	<p>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).</p> <p>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.</p>
Personal information	<p>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: https://www.westsuffolk.gov.uk/Council/Data_and_information/howweuseinformation.cfm or call Customer Services: 01284 763233 and ask to speak to the Information Governance Officer.</p>

Agenda

Procedural matters

1. **Apologies for absence**
2. **Declarations of interest**

Members are reminded of their responsibility to declare any disclosable pecuniary interest, other registerable or non-registerable 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

3. **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.

4. **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 or telephoning 01284 757176 or in person by telling the Committee Administrator present at the meeting. **We 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.

Key decisions

- | | | |
|-----------|--|------------------|
| 5. | Advanced Manufacturing and Engineering Centre Project
Report number: CAB/WS/24/034
Portfolio holder: Councillor Indy Wijenayaka
Lead officers: Julie Baird and Andrea Mayley | 1 - 14 |
| 6. | Market Development Plan 2024
Report number: CAB/WS/24/035
Portfolio holder: Councillor Indy Wijenayaka
Lead officer: Julie Baird | 15 - 116 |
| 7. | Acquisition of property for use as temporary accommodation
Report number: CAB/WS/24/036
Portfolio holders: Councillor Diane Hind and Richard O'Driscoll
Lead officers: Rachael Mann, Jen Eves and Jill Korwin | 117 - 124 |

Non key decisions

- | | | |
|------------|---|------------------|
| 8. | Draft West Suffolk Annual Report 2023 to 2024
Report number: CAB/WS/24/037
Leader of the Council: Councillor Cliff Waterman
Lead officer: Ian Gallin | 125 - 150 |
| 9. | West Suffolk Environment and Climate Change Update Report: 2024
Report number: CAB/WS/24/038
Portfolio holder: Councillor Gerald Kelly
Lead officer: Jill Korwin | 151 - 202 |
| 10. | Gambling Policy Statement update
Report number: CAB/WS/24/039
Portfolio holder: Councillor Gerald Kelly
Lead officer: Jen Eves | 203 - 268 |
| 11. | Use of Chief Executive urgency powers: acquisition of property
Under Part 3, Section 5, Scheme of Delegation to Officers, paragraph 14 of the Council's Constitution, it states:

`Where, in the opinion of the Chief Executive, by reason of limitation of time or urgency, a decision is required on any matter, after such consultation as they consider necessary (or as is required by the Council's Budget and Policy Framework | |

Procedure Rules in Part 4 of the Constitution), they shall have power to make a decision provided that any such decision shall be reported to the next meeting of the Cabinet, appropriate Committee or Council unless there is a need for confidentiality, in which case the reporting of the decision may be deferred until the need for confidentiality expires.'

On 12 June 2024, the Chief Executive exercised his urgency powers and made a decision to enable at public auction, to bid for and acquire, if successful, the freehold interest of a parcel of land and property known as Stourview Medical Centre in Haverhill.

The decision made at the time was exempt due to its commercial sensitivity; however, that exemption has now been lifted.

The decision taken was specifically:

1. To approve for the Service Manager for Property to bid on behalf of the Council at public auction to acquire land and property at Stourview Medical Centre in Haverhill. The auction to take place at 2pm on Wednesday 12 June 2024 at Cheffins Auction House, Cambridge. The bidding to be carried out in person.
2. Approve the purchase of the freehold interest of land and property at Stourview Medical Centre for a maximum of £305,000 (three hundred and five thousand pounds), excluding VAT, fees and Stamp Duty Land Tax, to be funded from the Investing in Growth fund.
3. Establish a capital budget of £318,900 (three hundred and eighteen thousand, nine hundred) to be made available to facilitate the purchase, including fees and Stamp Duty Land Tax, to be funded from the Investing in Growth fund.
4. Establish a capital budget of £50,000 (Fifty Thousand Pounds) to fund the cost of any immediate repairs and maintenance; and (any balance from the max bid price will also be made available if required for necessary works to relet).
5. Establish a revenue budget of £15,000 (Fifteen Thousand Pounds), for the period of 1 year to cover the holding costs of the building, as detailed in the supporting business case.
6. That should the purchase be made, the Council's Section 151 Officer will make the necessary changes to the Council's prudential indicators as a result of (2), (3), (4) and (5) above.

The decision was made in consultation with the Leader of the Council; Portfolio Holder for Resources; Haverhill ward members;

Group Leaders; Scrutiny Chairs; the Monitoring Officer and Section 151 Officer.

For further details, see Officer Decision Record published [here](#)

Recommendation:

In accordance with the Constitution, Cabinet is requested to **note** the use of the Chief Executive's urgency powers in respect of making the decision outlined above.

Part 2 – exempt

None

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Advanced Manufacturing and Engineering Centre Project

Report number:	CAB/WS/24/034	
Report to and date:	Cabinet	23 July 2024
Cabinet member:	Councillor Indy Wijenayaka Portfolio Holder for Growth Email: indy.wijenayaka@westsuffolk.gov.uk	
Lead officers:	<p>Julie Baird Director – Planning and Growth Tel: 01284 757613 Email: democratic.services@westsuffolk.gov.uk</p> <p>Andrea Mayley Service Manager (Economic Development and Growth) Tel: 01284 757343 Email: democratic.services@westsuffolk.gov.uk</p>	

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**

Recommendation: **It is recommended that Cabinet:**

- 1. Notes the current position and deliverability challenges of the AME project as set out in section 2 of Report number: CAB/WS/24/034.**

- 2. Taking into account the risks set out in section 5 of Report number: CAB/WS/24/034, agrees for the AME project to progress to the next Gateway (gateway 4), utilising up to £450,000 from accumulated funding generated from Pot B Enterprise Zone receipts.**

1. Context to this report

- 1.1 According to a recent report by Oxford Economics and the Manufacturing Technologies Association, 'making things' accounts for 34.5 percent of all UK goods and services exports. In addition, the median wage in this sector is £31,300 – which is 11 percent higher than the national median wage. The industry is worth £518 billion and supports 7.3 million UK jobs directly and across the supply chain/communities it operates in. (Source: Product Engineering Solutions Media April 2024 [Report highlights true impact of UK manufacturing on GDP - PES Media](#))
- 1.2 West Suffolk Strategic Priorities 2024-2028 make a commitment to Sustainable Growth and recognise the importance of "supporting new and existing businesses to grow". The priorities set out a focus on "attracting higher skilled enterprises to support wage growth" for the benefit of our local communities.
- 1.3 Advanced Manufacturing and Engineering (AME) is a key growth sector for West Suffolk. According to 2022 data, 9.2 percent of employees work in manufacturing in West Suffolk compared to 7.5 percent nationally.
- 1.4 The West Suffolk Manufacturing Group, set up by the Council in 2019 has been nurtured into a strong networking and information group which regularly sees over thirty independent businesses attend its meetings. Businesses have reported that attending these meetings has introduced them to other companies, opportunities and enabled them to learn different skills. One business estimated that attendance at "the group has allowed us to explore and take advantage of opportunities estimated at £800K".
- 1.5 For over ten years the Council has worked closely with the Nationally renowned Hethel Engineering Centre. Working with the team of experts at Hethel Innovation we have explored opportunities for West Suffolk AME businesses to provide business growth support such as enabling businesses to diversify their products and income streams. Hethel has been a key partner helping to deliver events in the annual West Suffolk Business Festival and are a key supporter of the WS Manufacturing Group. To this end, Hethel has been a key partner in the development and connectivity of the AME sector in Norfolk and Suffolk.
- 1.6 The business case for this project was originally approved at Council in December 2021 (Report number COU/WS/21/016 refers). This included the allocation of a £12.1 million capital budget funded from the Investing in Growth Fund through prudential borrowing. This budget included for the purchase of 6.8 acres of land at Suffolk Business Park which has already taken place. The financial case included details of the unique way this project was to be funded with an annual income from the Suffolk Park Enterprise Zone (EZ) over a 25 year (total) lifetime.

- 1.7 External factors relating to Brexit, Covid, global conflicts, inflation, access to construction materials and interest costs etc have adversely affected the affordability of UK construction projects. As a result, the current cost plan for the AME centre project estimates a total figure of £16.1 million, however after value engineering it is felt that a sum of £15.1 million should be achievable. This is £3 million over the original £12.1 million capital budget. The total cost over the life of the project (17 years to match the remaining time of the EZ) is around £22 million, which is made up of £15.1 million capital cost and £7 million in interest payable. The predicted total sum available from Pot B (see paragraph 2.3 for an explanation of the Pots) has increased recently but is still only approximately £15 million in total, this is insufficient to cover the cost increases and the associated borrowing costs and therefore the project is on hold since October 2023.
- 1.8 During this time the project team has been working with Suffolk County Council (SCC) and New Anglia Local Enterprise Partnership (LEP) to secure additional funding from Pot C to add to Pot B, to cover this shortfall. As a result of those discussions and to maintain progress, the budget for 2024 to 2025 included provision to increase the capital budget to 15.1 million subject to agreement to use of the addition EZ receipts through increasing the size of Pot B.

2. Current AME Centre project update

2.1 The Council has purchased 6.8 acres of land at Suffolk Business Park to develop an 80,000 sq ft AME Centre in two phases. The first phase of the centre has been designed to RIBA Stage 3 and includes:

- Self-contained but linked, flexible workshop units
- A Hub building with café, meeting rooms, offices etc.
- Car parking, landscaping, HGV access
- Opportunity for business support and networking events for the wider AME community

2.2 Including the cost of the land, there has been £3.9 million spend to date on the project from the initial £12.1 million budget allocation.

2.3 The Centre can be funded from the locally retained business rates generated from the Suffolk Park Enterprise Zone (EZ) adjacent. However, to achieve this, additional income from the business rates needs to be added to the retained rates that WSC have rights over. This fund (made up of 100 percent retained business rates) is split into three parts:

- Pot A (5 percent SCC and 20 percent WSC) replicates the amounts that Suffolk County Council (SCC) and WSC usually receive from business rates. These amounts form part of the council's general budgets to fund the delivery of services and are therefore already committed.
- Pot B (35 percent) is retained by WSC for local economic development initiatives (and has been agreed to be used to fund this AME centre)
- Pot C (40 percent) is retained collectively by the Suffolk local authorities (prior to April 2024 it was retained by New Anglia LEP and is now retained by SCC). At the time of writing, the decision-making process relating to the spending of Pot C is yet to be determined.

2.4 The intention is that once built, the AME centre will be managed and operated by a leading business support agency with a track record of delivering and supporting growth to AME companies. This is a game changing opportunity for the local economy. The centre can become the heart of an emerging AME cluster, providing access for companies to a range of support and physical space encouraging their journey into growth. Ultimately, local people will have access to higher value jobs, careers and skills in a key growth sector.

2.5 There are a number of outcomes that this project can deliver including:

Maximising previous investment – West Suffolk Council worked in partnership to deliver the Eastern Relief Road (Rougham Tower Avenue) including contributing £3 million to bring it forward. This opened up the 72 hectares of employment land including the 14 hectare Enterprise Zone. All of this work increased economic activity along A14 corridor and beyond.

Supporting the growth of a key sector within West Suffolk – currently there is a general lack of small and medium employment space due to the fact that this size of unit is not as commercially viable. Incubation centres like the proposed AME centre often require public subsidy. The Carter Jonas study stated that “AME centre will provide a range of workshop units providing space not readily available in the market and on flexible terms that businesses will be seeking”.

Creating a catalyst for an AME cluster – The industry is worth £518 billion and supports 7.3 million UK jobs (Oxford Economics). There are a number of companies already at Suffolk Business Park and in West Suffolk more generally that can be galvanised into a sector cluster.

Increasing average salaries and aspirations – the median wage in this sector is £31,300 – which is 11 percent higher than the national median wage (Oxford Economics).

Providing a nucleus for advice and networking for new and existing AME businesses.

Increasing the pipeline to address skills gaps with Eastern Education Group and universities, sustaining more apprenticeships and careers in this sector.

Maximising investment in the existing AME business network which aims to support business growth in this sector.

- 2.6 A Business Case for the purchase of the land and the development of phase 1 was approved in December 2021. At this point the approved budget for the scheme was £12.1 million which was to be funded entirely from Pot B income. It is worth noting that Pot B income is guaranteed for 25 years (from 2016) in total and is only received by the Council annually – therefore the Council is required to borrow the up front capital sum needed to build the centre and to use the income from Pot B to cover both the capital cost and borrowing costs over the remaining life of the EZ (rates retained until March 2041).
- 2.7 More recently, as part of the 2024 to 2025 budget setting process, it was agreed to increase the £12.1m budget to up to £15.1 million if required and provided that the scheme still achieved a break-even position for the Council through retaining further rates from Pot C.
- 2.8 The project is currently at the end of Gateway Stage 3 and the first stage tender is complete with the contract being ready to be awarded to the contractor. In addition, the scheme is ready to be submitted for planning approval and favourable pre application advice has been received from the Local Planning Authority.
- 2.9 There are cost and time implications to be considered from this further delay. However, the current cost plan estimates a total figure of £16.1 million (£15.1 million with value engineering) which is £3 million over the original £12.1 million budget and whilst the predicted total sum available from Pot B has increased to circa £15 million in total across its 25 years, this is insufficient to cover the cost increases and the associated borrowing costs (£7 million) and therefore the project is on hold.

- 2.10 It is important to note that the cost increases on this project are not due to internal factors but matters out of the control of the Council. Factors relating to Brexit, Covid, global conflicts etc have affected inflation, access to construction materials and interest costs. The design team has worked to look for opportunities to value engineer the scheme to bring it closer to budget and it is recognised that once appointed, the contractor will assist with value engineering bringing the overall construction cost (including the land) closer to £15.1 million. It is worth noting that it has been a number of months since the costs have been tested and further work will be needed to bring cost certainty.
- 2.11 Discussions have been ongoing firstly with New Anglia Local Enterprise Partnership (LEP) until its demise in March this year and also with SCC regarding the possibility of the Council accessing additional funding for this project from Pot C of the retained business rates. Unfortunately, these discussions have been delayed by the lengthy transition arrangements relating to the establishment of the new Business Board which will take on many of the responsibilities previously in the domain of the LEP. These delays have a further negative impact upon the project's cost plan.
- 2.12 It is now clear that the decision as to whether the Council is able to access the funding it needs to progress this project from Pot C, will be taken by the SCC Cabinet and the new Business Board. We continue to work with the post LEP structure hosted by SCC, and headed by the Suffolk Business Board, to ensure there is the necessary support to deliver the AME Centre.
- 2.13 Work is currently taking place to define a revised economic strategy and priorities for Suffolk, under the Business Board. Whilst this work is in relatively early days, it is already clear that the AME sector will be a key component and future priority, and that the strategy will recognise the critical role district schemes and projects will play in delivering the strategy. The AME centre project is therefore expected to be well aligned to intentions of the strategy, and we understand SCC and the Business Board will be keen to ensure the scheme has a regional visibility and benefit that stretches beyond the West Suffolk district boundary.
- 2.14 With regard to the requirement for additional funding for the scheme, both councils are working together to access additional funding from Pot C to ensure the project is fully funded prior to any construction contract being entered into. This work is progressing well and SCC officers are further briefing their members over the coming weeks to set out the detailed requirements, ahead of formal decision making process. SCC remains supportive of the scheme but is seeking to work through further details as regards mix of funding requirement (grant vs annual support), timings of investment etc, to ensure the scheme offers the best value for money.
- 2.15 In addition, SCC will continue working with the Council to ensure the future funding proposal clears the requirements of the government subsidy control

regime. An application for review has been submitted and this process is expected to take eight weeks.

- 2.16 Capital projects such as this one are organised into a series of Gateways which enable the Council to review progress and take appropriate decisions before moving the project forward. The Gateways roughly align to the RIBA (Royal Institute of British Architects) stages which are the way the construction industry understands the work packages. This project has completed Gateway 3 and has been on hold for over a year now and this delay is adversely affecting the costs of bringing the project forward. Gateway 4 is approximately 11 months long and would enable the project to be taken through to planning permission and would result in the first stage contractor being appointed. As the construction project is split into two stages, the first stage only commits the Council to detailed design and brings greater cost certainty. A decision to proceed into Gateway 4 only commits the Council to up to £450,000 of Pot B (already accounted for in the project costs). Also, SCC has agreed to fund half of this cost which is helpful in terms of reducing the financial liability and also in terms of showing SCC's commitment to the project.
- 2.17 The Council is already in receipt of Pot B funding from the retained business rates on the Enterprise Zone and it could choose to use this funding to restart the project and take it through the next gateway. This would have the effect of minimising cost increases and enables sufficient time to secure additional funding from Pot C. However, without the confirmation of funding to support the full £15.1 million there is no guarantee that the project will complete and therefore there is a risk that the costs incurred to date and going into the next gateway would be abortive.

3. Proposals within this report

- 3.1 It is recommended that West Suffolk Council (WSC), taking into account the risk of abortive costs, supports the use of Pot B of up to £450,000 to fund the next project gateway to enable the scheme to restart and be taken through Planning. SCC has confirmed that it will fund half of these costs to enable the project to recommence. At the same time, both councils are working together to access additional funding from Pot C to ensure the project is fully funded prior to any construction contract being entered into. The £450,000 amount (maximum) would be funded from the Pot B already controlled by WSC. SCC has its own access to finance for this sum.

4. Financial considerations

- 4.1 The £450,000 would be from Pot B retained business rates that the Council has already received, therefore the financial exposure of proceeding to the next stage is quite low. Further, SCC has agreed to fund half of these costs. There is however an opportunity cost to underwriting these costs if the project were not to go ahead, as this funding from Pot B would not be available for other initiatives.

- 4.2 The table below details the current financial position of the scheme on Suffolk Business Park, although as the project has been on hold for over nine months the capital estimates need to be revisited to ensure they are achievable, this will be tested as part of the next gateway.

AME Units at SBP	£
Capital Estimates	
Build Costs incl contingency (after Value Engineering)	10,643,000
Fees	1,010,453
Land purchase cost incl SDLT and legal fees	3,447,547
Total Estimated Capital Cost	15,101,000
Annual Revenue Implications	
Initial Rental Income	221,700
Initial Landlord costs	(151,010)
Borrowing Costs	(1,299,727)
Total Estimated Annual Surplus / (Deficit)	(1,229,037)
Forecast Average Annual Income from Pot B	874,618
Total Lifetime Surplus / (Deficit) - 17 years	(7,132,800)

As can be seen from the table above, there is a forecast initial annual deficit of £1.23 million before applying funding from Pot B. The forecast average annual income from Pot B is just under £875,000, so does therefore not cover the current forecast deficits. This leads to a lifetime deficit (over the remaining life of the Enterprise Zone) of £7.13 million.

5. Risks

- 5.1 There are a number of risks relating to the proposal to forward fund the next gateway of the project. The first of these is that even after all the work we have put into negotiations with firstly the LEP and now SCC, the decision is to not allow access to Pot C, or to only allow a smaller contribution than required.

Mitigation

Significant levels of work have gone into the assessment of the cost/benefit ratio to enable a persuasive argument to be presented to the Pot C decision making body. Further SCC has shown commitment to the project by agreeing to fund half of the costs of restarting and entering into Gateway 4.

- 5.2 There are several risks that relate to further delay, these include difficulties in bringing the design team back together, having to restart the design from scratch, construction costs increasing, interest rates fluctuating, and additional legal requirements/changes in policy.

Mitigation

Restart the project as soon as possible as per the recommendations of this report.

- 5.3 The focus upon costs can also bring risks to the central outcome for this project. The opportunity here is to create a step change for the local economy and the AME sector specifically. If a centre is built but there is no interest from centre operators/no independent body to run the centre for us, we will potentially have day to day revenue issues and not deliver against our ambitions for the AME sector.

Mitigation

Loss of economic value that the project will deliver can be mitigated by engaging with centre operators to ensure that there are options for the centre to be run and for the delivery to match the economic expectations.

6. Alternative options that have been considered

- 6.1 Several other options have been considered and discounted. The first of these is described as Option 2 and is for the project to stay on hold until the decision regarding access to additional funding from Pot C is known.
- 6.2 This option would enable the project to be taken forward at some point in the future when there is certainty as to whether additional funding will be allocated from Pot C to cover the gap. This option is considered to have a slightly higher financial ask in total, through increased construction and design team costs, for the Council compared to the preferred option due to the extended project delay. This option however avoids the risk of further abortive costs if gap funding for the project is not secured.
- 6.3 There are potential implications as a result of further delay to the project. Inflationary costs continue to rise and the funding gap is very likely to worsen. We have already seen that legislative changes have had an adverse impact upon costs with the new Building Safety Act requiring the project to employ a Principal Designer. Further delay may result in the need to undertake some of the preliminary surveys again, as they are only valid for a set period. In addition, we have already seen that some of the existing Design Team have been reallocated to other projects and there is a risk that when this project recommences, we may not have access to the same team (and therefore the same project knowledge) to pick up from where we left.
- 6.4 The third option considered was for West Suffolk Council to allocate the additional funding from the Strategic Priorities and Medium Term Financial Strategy (SP&MTFS) reserve to enable the current project to be taken forward regardless of whether we are able to access funding from Pot C or

not. If we used the funds accumulated in Pot B to upfront fund some of the capital costs, then the amount required from the SP&MTFS reserve would be circa £3.5 million based on current build cost and interest rate assumptions.

- 6.5 This option has the advantage of enabling the project to restart and thereby reducing exposure to further cost increases. However, this option would result in a significant allocation of the SP&MTFS reserves being spent on this one project, the remaining fund balance uncommitted is likely to then be around £0.5 million for the delivery of the agreed Strategic Priorities across the term 2024 to 2028.
- 6.6 It is worth noting that the Council is already contributing over and above the Pot B allocation as described in the original business cases through holding the delivery and operational risk associated with this project.
- 6.7 The fourth option was for work to continue to gain additional funding for the project from Pot C with a view to developing a scheme for Olding Road instead of Suffolk Business Park and or provide the land at Olding Road as our contribution towards the project funding gap.
- 6.8 This option could be to retain part of the warehouse or to completely demolish the warehouse and redevelop instead. Olding Road has the potential to accommodate a similar size of centre as proposed at Suffolk Business Park (SBP) along with a similar amount of space for a possible phase 2. Whilst Olding Road is physically close to West Suffolk College and this could be an advantage for fostering relationships, it is the case that any provider on either site will be required to work with West Suffolk College and other regional colleges to help deliver clear skills outcomes.
- 6.9 The proposed uses accord with planning policy as well as the land allocation of the current and emerging Local Plan. However, delivering the same outcomes from an AME centre on the Olding Road site relies on our ability to secure a sector specific operator who can provide the added value needed to support the businesses. At this stage there is a risk that we have not sufficiently tested this location with potential operators. There are limited specialist providers for the AME sector and therefore we may be limited in who we can secure to run the centre for us. Therefore, the potential to achieve the outcomes in terms of targeted business support and networking may be reduced. We could end up with a different type of incubation centre, which is already provided for locally. This option would require work to bring partners on board and to develop a narrative regarding the potential offer and benefits of this location.
- 6.10 High level cost estimates for this option suggest that the capital cost could be in the region of circa £13.8 million. This is lower than the £15.1 million on SBP, however this is only due to the fact that Olding Road has no land costs attached to it, the actual construction costs are expected to be higher on Olding Road than the construction costs on SBP. This lower capital cost also does not close the funding gap of the project by itself, so this option would also require additional funding from other sources to make it break even.

There are some unknown utility and highway capacity issues as well as other risks that require further investigation for this use in this location.

- 6.11 The fifth option considered was for us to “Do nothing” or to put the project on hold indefinitely or until costs reduce or additional funding can be found. This would be to effectively mothball the current project until interest rates have had a chance to reduce and Pot B to increase with time. This option carries the risk that costs do not reduce in time and that costs actually increase further – viability of the project may therefore never be achieved.
- 6.12 Mothballing the current project would mean that the projects costs incurred to date would likely be abortive costs. The total of the costs incurred to date on the project (not including the land purchase) is £444k, which would be funded from the accumulated balance of Pot B. The Council would also need to manage the borrowing costs associated with the land purchase within its current treasury management budgets until such a time that the project was to recommence, or another use was found for the land.
- 6.13 The final alternative option considered was for the development of small business units on Suffolk Business Park (SBP) within the original £12.1 million budget. This option has the benefit of not requiring a decision on Pot C. However, the land purchased at SBP is subject to a legal covenant and it may be necessary to renegotiate the proposed use with the original landowner. The development of basic employment units would be beneficial to the local economy in terms of providing a supply of smaller units of which there is a shortage locally. This option would not provide the level of support for the AME sector and would not result in a step change for the local economy. In addition, it is important to note that the use of funding over £10 million is now subject to Subsidy Control Regulations and the new scheme would be scrutinised (as are the other options but may be harder to satisfy under this option). Another disadvantage of this option would be that the Council would have to either run the units itself or try to find an operator.
- 6.14 The financial viability of this option is untested as work is required to understand what a scheme within the overall £12.1 million budget would look like, and therefore what the likely income and expenditure levels generated from the scheme would be.

7. Consultation and engagement undertaken

- 7.1 In 2021 the Council commissioned Hethel Innovation to survey local AME businesses to help build up a picture of local demand for an AME Centre. The survey revealed that 92 percent of the respondents agreed with the statement "I have plans to expand my business within the next three years". Further, nine businesses planned to recruit more staff, and a further five were investing in business growth. When asked, 'What are your priorities when choosing a physical space for your business?' respondents commented:

- Cost and fit with products manufactured
- Proximity to Bury St Edmunds and on a business park ideally
- Factory layout and infrastructure
- Facilities, comfort, and environment
- All buildings are on our land
- Size, cost, location
- Suitability
- Location
- Departmental integration

7.2 Local businesses and commercial property agents were also consulted with regard to land and premises requirements as part of the Employment Land Review study which was evidence supporting the emerging West Suffolk Local Plan.

7.3 A further commission was awarded to Hethel Innovation to support the Council in the development of the design for the AME centre. It was recognised at an early stage that the performance of such a centre is strongly related to its design and appearance.

7.4 In August 2023 Carter Jonas were instructed by the Council to undertake an assessment to support decisions relating to how such a centre would be managed going forward and what the commercial market view of likely levels of rent could be. This work supported the updating of the financial case.

7.5 All of the above engagement was undertaken with Suffolk Business Park as the identified location for the proposed centre. If Option 4 is preferred, there may be the need to undertake additional engagement and intelligence to ensure the business case is still sound.

8. Background documents associated with this report

8.1 Proposed Incubation Units item at Council 14 December 2021: Report number [COU/WS/21/016](#)

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Market Development Plan 2024

Report number:	CAB/WS/24/035	
Report to and date:	Cabinet	23 July 2024
Cabinet member:	Councillor Indy Wijenayaka Portfolio Holder for Growth Email: indy.wijenayaka@westsuffolk.gov.uk	
Lead officer:	Julie Baird Director – Planning and Growth Tel: 01284 757613 Email: democratic.services@westsuffolk.gov.uk	

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

Recommendation: It is recommended that Cabinet adopts the Market Development Plan, as contained in Appendix A to Report number: CAB/WS/24/035, and allocates £290,000 from the Strategic Priorities and MTF Reserve, and £10,000 from UK Shared Prosperity Fund (UKSPF) over three years to implement the measures.

1. Context to this report

- 1.1 Markets are currently operated by West Suffolk Council across the six towns (Brandon, Bury St Edmunds, Clare, Haverhill, Mildenhall and Newmarket) between twice weekly and monthly with approximately 123 permanent traders between them.
- 1.2 In 2021 a review of markets investigated the role of West Suffolk Council, considering how to align the operation of the markets to the council's strategic vision and support their development to meet the corporate priorities. A Market Review Action Plan "Creating Successful Markets" was developed which outlined measures such as improving communications, marketing to reviewing fees and waste provision and creating town specific development plans.
- 1.3 Markets are currently in a period of transition in the same way that the high street is evolving to a new way of operating and changing shopping habits meaning that further intervention and support is required.
- 1.4 Across the towns there is a need for the markets to be developed rather than serviced, by working with town stakeholders and the traders, both old and new, to reinvigorate and increase the contribution that markets can make to town centres. This will involve initiatives to expand the offer, attract new customers, promote the stalls and the places they locate, and protect the history and heritage of the markets.
- 1.5 In order to support this transition, in April 2024 an internally developed development plan for West Suffolk markets was commissioned, building on the previous Market Review Action Plan (2021) and following the previously agreed outline summary of a proposed development plan.
- 1.6 West Suffolk Council's Strategic Priorities 2024 to 2028 identifies sustainable growth as one of the four priority areas. Within this area is a focus to "continue to support West Suffolk's local high streets and markets as the vibrant centres of thriving local communities." It also sets out a wider engagement strategy with plans for improving our town and village high streets and town centres, including markets.
- 1.7 This engagement focus, with local stakeholders traders and the public, has allowed the 2021 Market Review to be built upon further by returning to local stakeholders, traders and the public to understand more about the challenges and opportunities in each town to ensure that the correct measures are proposed, developed, and implemented in each town.

- 1.8 The results from the recent engagement activity supported the findings of the 2021 Market Review: overall, market users are satisfied with the location, timings and frequency of the markets and they visit to support local businesses, to shop for groceries and to enjoy the outdoors, however there are clear individual differences between the towns.
- 1.9 The overall engagement approach resulted in proposed actions and initiatives for markets – both in terms of an overarching strategic approach as well as bespoke actions for individual towns. These have been integrated into the appropriate development plan.

2. The Market Development Plan

- 2.1 The Plan is available in Appendix A attached to this report and is provided with additional information such as the action plan and survey summary if further detail is required.
- 2.2 This Market Development Plan builds upon the 2021 Market Review with the production of town-specific development plans for each of our markets.
- 2.3 With the aim of improving the way that markets are operated based on lessons learned, the market review and the invaluable input from our residents, traders, and visitors of the market, these frameworks, supported by an overarching plan, outline a variety of measures and initiatives ranging from short to long term timescales with bespoke place-based interventions.
- 2.4 West Suffolk's towns vary in size and offer. These differences are evident in their markets, from a small monthly market in Clare to a large twice weekly market in Bury St Edmunds.
- 2.5 These markets have different needs, requirements, and ways of operating, which are observations made in the 2021 Market Review. A range of other challenges have been identified, such as:
- The way markets are operated.
 - The changing nature of retail.
 - The Market Licence Regulations.
 - The type of market in each town.
 - Market locations.
 - Attracting new traders and customers.
 - Adverse weather policies.
 - Engagement with traders and town stakeholders.
- 2.6 Taking all of the information from the 2021 Market Review in addition to the breadth of information from the 2024 engagement sessions

and surveys an overarching framework and individual town plans, set out improvements and initiatives to be carried out by a dedicated markets team that will focus on developing our markets under the following themes:

- Supporting businesses.
- Providing an experience.
- Marketing the markets.
- Working with the community.
- Caring for the environment.

2.7 The “Markets Matter” Development Plan sets out a three-year ambition for the future of our markets with the individual needs of the towns, their traders, and their residents at its heart with a vision objective to:

- Shift the focus from servicing to active development.
- Support and nurture the markets.
- Protect and preserve.
- Provide a space for vibrant markets.
- Engage with partners and stakeholders.
- Encourage more sustainability.
- Be resilient and adaptive.

2.8 A key element of this development plan will be to evaluate the impact of the actions over time. This is to ensure that the measures implemented are successful and making a difference, and to consider if a different approach is needed in some circumstances.

2.9 This evaluation will involve a mixture of qualitative and quantitative data to gain an insight into the following key measures identified through our engagement.

- A wider variety of traders operating in more towns.
- Raised awareness of West Suffolk markets from marketing and promotions.
- Reduced environmental impact of markets.
- A positive community narrative around the markets.
- Increased footfall to our markets and town centres.
- More traders engaging in business support.
- Higher trader satisfaction.

2.10 Regular engagement with members, town stakeholders, traders and shoppers will also be a key element to ensuring the success of the markets.

2.11 The Market Development Plan will return to members of Cabinet after the first six months to provide an update on progress and any new initiatives. Following this period, ongoing monitoring and review will take place.

3. Delivering the Plan

- 3.1 To deliver this plan, West Suffolk Council would need to make some key internal changes to move the responsibility for running markets from the Operations service to the Economic Development service. The Operations team will be contracted to deliver support on an individual town/event need basis.
- 3.2 Markets currently operate at a cost to West Suffolk Council around £80,000 to £100,000 per annum and it is proposed that Cabinet support an investment into the implementation of the Market Development Plan of £300,000 over three years.
- 3.3 This funding will support:
- Additional market officers and market admin support.
 - Development funding to support initiatives.
 - Marketing resources.
- 3.4 It is anticipated that as the markets begin to grow as a result of this new approach, the income from markets will move closer towards closing the gap as we work towards more financial sustainability from markets.

4. Alternative options that have been considered

- 4.1 West Suffolk could continue to operate markets as they are currently, however the markets will continue the way there are now or move further into decline. This plan brings a clear focus and new investment.

5. Consultation and engagement undertaken

- 5.1 Engagement was undertaken with local stakeholders in the six towns across West Suffolk as part of the development of the plan, in addition to town and district councillors, market traders and the general public through an online survey.
- 5.2 The online survey received a total of 189 responses and the data is summarised in Appendix 2 of the Market Development Plan (Appendix A).
- 5.3 Each town was offered an engagement session online, hosted by the Portfolio Holder for Growth, to discuss the markets, strengths and weaknesses and the aspirations for the respective towns. These sessions were attended by town and district councillors in addition to other town stakeholders.

5.4 A final session was also held specifically for market traders.

6. Risks associated with the proposals

6.1 There is a risk that the new staff structure is not suitable; however support will be in place to ensure that it works in a way that the development plan can be implemented.

6.2 There may be initiatives that have been included in the plan that are not achievable either at all or in the timeframe allocated; however the key to the delivery of the plan is engagement with stakeholders and traders and expectations will be managed through engagement.

6.3 After the three years there may not be any improvement or changes to markets and the income has not started to close the investment gap; however regular monitoring on progress will be undertaken throughout this development plan to ensure issues are addressed as they occur.

6.4 There is a risk that the external factors affecting markets continue to deepen faster than the changes we make to our markets. The town centre trading environment is under significant pressures, not least by online retailing and these elements are outside of our control. However, one of the aims of the plan is for markets to evolve and adapt to new patterns of retailing and to provide relevance into the future by attracting new and younger customers.

7. Appendices referenced in this report

7.1 Appendix A: The Market Development Plan (including Appendices 1 and 2 attached to the plan itself.)

8. Background documents associated with this report

8.1 Report number: [OAS/WS/22/008](#): The Market Review

“Markets Matter”

West Suffolk Markets Development Plan 2024

Executive Summary

1. Introduction

2. Challenges & Opportunities

3. Engagement

4. The Vision

5. The Development Plan

6. Evaluation

Appendices

Appendix 1: Market Development Plans

Appendix 2: Market Survey Summary 2024

Executive summary

In July 2022 Cabinet approved the action plan recommended by the Overview & Scrutiny Markets Review Working Group

In April 2024 West Suffolk Cabinet continued to show support for the action plan by requesting that a Market Development Plan be created to support the transition of West Suffolk markets into the future.

Building on the existing Market Review, with an emphasis on how we develop individual market offers, engagement was conducted with residents, traders, and visitors to each of the six markets to support previous finding and further inform the development plan.

The results showed that shoppers, visitors, and traders continue to care about the markets and want to see them thrive with increased events, variety of stalls, increased environmental awareness and a pleasant and friendly atmosphere.

The “Markets Matter” Development Plan sets out a three-year ambition for the future of our markets with the individual needs of the towns, their traders, and their residents at its heart with a vision objective to shift the focus from servicing to active development; support and nurture the markets; protect and preserve; provide a vibrant space; engage with partners and stakeholders, encourage more sustainability; and be resilient and adaptive.

An overarching framework and individual town plans, set out improvements and initiatives to be carried out by a dedicated markets team that will focus on developing our markets such as encouraging more traders through initiatives offering more variety, themed markets, more events, increased support for traders, and more community and engagement.

Actions Summary

- Assemble the dedicated markets team
- Provide a more robust customer service experience for traders inc. business support
- Market officers to use social media platforms to promote markets
- Review and update the market licence regulations geared towards growth
- Develop a clear Inclement Weather Policy for traders
- Encourage local businesses to use the market as a shop front
- Expand the Young Trader Markets
- Provide additional seating, music and activities
- Explore new themed and events markets
- Explore new initiatives to retain existing and attract new traders
- Improve the appearance of the town centre and market area

Appendix A

Measuring the impact of this plan will be a key element with regular monitoring and local engagement to ensure that the plan remains suitable and impactful for each town.

1. Introduction

West Suffolk is home to six key market towns with strong rural communities surrounding them. The six regular markets in towns across the district are supplemented by a variety of event markets from Makers Markets to Young Trader competitions. These markets are steeped in history, with Bury St Edmunds tracing its market back to the times of William the Conqueror, Newmarket holding a market for over 800 years and Mildenhall market having been granted a royal charter in 1412. The rules and regulations for the markets are set and enforced by West Suffolk Council and were last reviewed in 2019.

Markets are currently operated by West Suffolk Council across the six towns (Brandon, Bury St Edmunds, Clare, Haverhill, Mildenhall and Newmarket) and are operated between twice weekly and monthly with c. 123 permanent traders between them.

Makers Markets are operated between March and December in Bury St Edmunds, Haverhill and Newmarket with additional events leading up to Christmas. They represent an opportunity for independent businesses and talented local residents to showcase their locally produced food, drink, and other merchandise. A farmers' market is also delivered under contract in Bury St Edmunds by Suffolk Market Events between March and December.

Across the towns there is a need for the markets to be developed rather than serviced by working with the traders, both old and new, to expand the offer, attract new customers, promote the offer, and protect the history and heritage of the markets.

In 2022 a review of markets investigated the role of West Suffolk Council, considering how to align the operation of the markets to the council's strategic vision and support their development to meet the corporate priorities. A Market Review Action plan "Creating Successful Markets" was developed which outlined measures to improve the markets, such as improving communications, marketing to reviewing fees and waste provision and creating town specific development plans.

This Market Development Plan builds upon the 2022 Market Review with the production of town-specific development plans for our markets.

With the aim of improving the way that markets are operated based on lessons learned, the market review and the invaluable input from our residents, traders, and visitors of the market, these frameworks, supported by an overarching plan, outline a variety of measures and initiatives ranging from short to long term timescales with bespoke place-based interventions.

By delivering these changes and providing increased and individualised support to our towns we will support West Suffolk markets into the future, with the resilience to further adapt and evolve over time.

2. Challenges and opportunities

West Suffolk Council's Strategic Priorities 2024-28 identifies sustainable growth as one of the four priority areas. Within this area is a focus to "continue to support West Suffolk's local high streets and markets as the vibrant centres of thriving local communities." It also sets out a wider engagement strategy with plans for improving our town and village high streets and town centres, including markets.

This engagement focus has allowed the Market Review 2022 to be built upon further by returning to local stakeholders, traders and the public to understand more about the challenges and opportunities in each town to ensure that the correct measures are proposed, developed, and implemented in each town.

West Suffolk's towns vary in size and offer. These differences are evident in their markets, from a small monthly market in Clare to a large twice weekly market in Bury St Edmunds.

These markets have different needs, requirements, and ways of operating, which are observations made in the 2022 Market Review. A range of other challenges have been identified, such as:

- a. **The way markets are operated.** With a primary focus to date on servicing the markets there has been less resource available to develop the markets and the traders which presents a key opportunity to shift this approach to develop thriving markets.
- b. **The changing nature of retail.** In some towns markets are not as frequently used as others in addition to the reliance and convenience of online retail and the role of markets in 2024 needs to be understood.
- c. **The Market Licence Regulations.** These regulations require updating to suit the role of markets in 2024 and beyond and the way in which traders.
- d. **The type of market in each town.**
- e. **Market locations.** Traders and residents in some towns highlighted that some markets could perform better and be more attractive if they were situated in a different location in the town.
- f. **Attracting new traders and customers.** A lack of variety and stall numbers was a criticism across a number of markets and there is an opportunity to broaden the offer and support new businesses across the markets.
- g. **Adverse weather policies.** The weather has caused issue for traders in recent years with high winds in particular causing early or total closures of the market affecting their incomes and a clear approach is needed.
- h. **Engagement with traders and town stakeholders.** The engagement with traders and towns has operated through several channels and has often caused mix messaging but there is an enthusiasm in the towns for clearer and greater engagement.

Appendix A

In order to protect and preserve West Suffolk markets the Council will undertake this shift, increase its investment in markets, and in partnership with the towns, drive the Markets Matter vision, detailed in section 4.

This change presents an opportunity to shift the way in which markets are operated across West Suffolk from servicing to development for the benefit of all, to provide a vibrant space for markets and communities which are resilient to future challenges.

3. Engagement

The purpose of the engagement was to gather the views, insights, and opinions from a wide range of people in order to inform the Market Development Plan. The work started with the council's 2022 Market Review, with an emphasis on how we develop individual market offers and building on the characteristics and potential customers for each of our six towns.

The council ran an online survey from 14 May to 31 May 2024 and received a total of 189 responses.

It was communicated through local stakeholders, the press and targeted social media posts inviting traders and the communities to "Have Your Say! Markets Matter!"

In addition to the survey, a series of stakeholder sessions were held to gather the thoughts of local stakeholders in each town with the opportunity to discuss the questions posed in the survey and to offer their wider insights and opinions. A session was held for each town on MS Teams between 21 and 24 May 2024.

Survey findings

The engagement supported the findings of the 2022 Market Review: overall, market users are satisfied with the location, timings and frequency of the markets and they visit to support local businesses, to shop for groceries and to enjoy the outdoors, however there are clear individual differences between the towns.

While Brandon, Clare and Bury St Edmunds reported high satisfaction rates of the market, visitors, and traders in Haverhill and Mildenhall were dissatisfied. A number of challenges and opportunities were highlighted and considered as part of the action plan creation with these individual issues at its heart.

The engagement sessions provided more in-depth feedback from town stakeholders, highlighting that markets need to be protected and preserved, are key to their local communities and that the shift in focus from 'servicing' to 'developing' is what the markets need.

In addition to the desire for the markets to become more environmentally friendly and sustainable, the demand for an increase in event and special markets remains high.

It was clear from the recent survey that marketing and promotion of the markets has increased, with fewer respondents noting this as a negative. However, physical promotion, such as signage, was considered an issue in several towns.

The traders also reported on the positives of trading in West Suffolk, such as the camaraderie with fellow traders, interacting with customers and being part of the community. Nonetheless, traders wanted more support around trading in adverse

weather, increased support, as well as updated rules and regulations to suit trading in 2024.

The overall engagement approach resulted in proposed actions and initiatives for markets – both in terms of an overarching strategic approach as well as bespoke actions for individual towns. These have been integrated into the appropriate development plan.

The summary report from the public engagement survey is available in appendix 2.

4. The Vision - “Markets Matter”

Markets provide a space for businesses to start and grow, to provide local goods and act as a hub for communities. Markets are in a period of transition and support is needed for future development, led by West Suffolk Council but supported in partnership by local stakeholders, traders and visitors across the towns.

Building on the success of West Suffolk Markets and to support them into the future we want the following outcomes:

A wider variety of traders and events operating in the towns

This will provide a draw to attract new customers to the market, which in turn will entice new traders to operate across the district.

More traders engaging in business support

Our traders will continue to be nurtured and developed by signposting them to appropriate business support and funding opportunities to support their business growth ambitions.

Increased awareness of West Suffolk markets

With a focus on the history, heritage and uniqueness of each town, more people locally and further afield will associate West Suffolk as the home of thriving market towns.

A positive community narrative around the markets

Traders and communities will speak positively about the markets, encouraging others to visit and trade and enjoy the social environment created by the markets.

Increased footfall to our markets and town centres

The thriving markets and associated events will provide a key draw for visitors into our town centres providing an increase in footfall which will benefit both the market and neighbouring town centre businesses.

Reduced environmental impact from the markets

Working with traders there will be a reduction in the waste generated from the market, which requires disposal, and these positive behaviours will be rewarded.

5. The Development Plan

Building on the 2022 Market Review in addition to the 2024 engagement, the Markets Matter development plan proposes a variety of actions and initiatives under the following themes:

- Supporting businesses
- Working with the community
- Marketing the markets
- Providing an experience
- Caring for the environment

The development plan has an overarching framework applicable to all West Suffolk markets in addition to providing place specific plans that set out a tailored approach to suit each individual town. These actions have been developed through engagement and best practice and will act as a roadmap for the markets team to work with traders, local stakeholders, and communities.

The key objectives of the development plan are to:

- a. **Shift the focus** from servicing the market to actively developing it with new markets, initiatives with additional resource.
- b. **Support and nurture the markets** by attracting new traders and support the existing.
- c. **Protect and preserve** the value, history, and heritage of the markets, by focussing on the individual towns.
- d. **Provide a space for vibrant markets** to serve our communities with a positive narrative.
- e. **Engage with partners and stakeholders** in each town in the practical delivery and promotion of our markets.
- f. **Encourage more sustainability** and environmental awareness by rewarding good trading behaviours and reducing waste.
- g. **Be resilient and adaptive** to change by regular evaluating and monitoring to ensure the appropriate support is in place.

The overarching framework and development plans for each individual town are set out in further detail in appendix 1.

6. Evaluation

A key element of this development plan will be to evaluate the impact of the actions over time. This is to ensure that the measures implemented are successful and making a difference, and to consider if a different approach is needed in some circumstances.

This evaluation will involve a mixture of qualitative and quantitative data to gain an insight into the following key measures identified through our engagement.

- A wider variety of traders operating in more towns.
- Raised awareness of West Suffolk markets from marketing and promotions.
- Reduced environmental impact of markets.
- A positive community narrative around the markets.
- Increased footfall to our markets and town centres.
- More traders engaging in business support.
- Higher trader satisfaction

Regular engagement with members, town stakeholders, traders and shoppers will also be a key element to ensuring the success of the markets.

The proposed timeframes in the plans are based on the key actions that are required to implement the specific town initiatives in addition to the resource available and reported urgency from the engagement sessions. These are subject to change through member and local consultation.

Markets Matter is not intended to be a short-term fix to address the issues raised during 2024 but will be a 'living' document and subject to regular updates and modifications.

The market development plan will return to members of Cabinet after the first six months to provide an update on progress and any new initiatives. A regular update will then be provided as appropriate as progress is made.

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West Suffolk

The development plan has an overarching framework applicable to all West Suffolk markets. These actions have been developed through feedback and best practice and will act as a roadmap for the markets team to work with traders, local stakeholders, and communities.

The recent engagement through the survey and town stakeholder engagement has provided reinforcement to previous issues in addition to providing new insight to some perceived shortcomings of the offer and barriers faced by new and existing traders.

This information has been used to introduce actions to address these and will be regularly monitored and added to over time.

Theme	Action	Timeframe	Comments
Supporting businesses	Assemble the dedicated markets team.	0-3 months	To ensure that markets are run from one dedicated team in Economic Development and Growth
Supporting businesses	Communicate the new development plan and approach to stakeholders and traders.	0-3 months	To ensure that partners and traders are all aware of the new way of working and the development plan objectives
Marketing the markets	Refresh the markets communication plan.	0-3 months	This will be regularly updated to ensure it remains current. There will also be an emphasis on individual town needs
Supporting businesses	Develop a relationship between	0-3 months	Market traders to be signposted to

Appendix 1: Market Development Plans

	markets and business support providers		business support providers such as Menta and Growth Hub to allow them access to advice and funding for growth
Supporting businesses	Set up a new method of communication for traders and market officers	0-3 months	To investigate a way for traders and market officers to easily communicate such as a WhatsApp group
Supporting businesses	Build a trader database to use for management, engagement, and promotion.	3-6 months	To consolidate all the information held relating to traders in one place that can be used to communicate and promote more effectively
Supporting businesses	Provide a more robust customer service experience for traders	3-6 month	Investigate the potential for West Suffolk customer services to support trader enquiries
Working with the community	Develop a West Suffolk towns and markets group.	3-6 months	Create a forum whereby interested parties from each of the towns can provide

Appendix 1: Market Development Plans

			feedback and insights from the towns and markets
Supporting Businesses	Update and promote the West Suffolk Market Start Up guide.	3-6 months	To ensure that the current guide is fit for purpose and includes all the information that a new trader needs
Supporting Businesses	Provide training for market officers to enable them to use social media platforms to promote markets.	3-6 months	To increase the amount of promotion that can be done on a market day and to provide additional support and engagement to traders
Working with the community	Investigate opportunities to provide activities and information on our markets to engage with hard-to-reach groups	3-6 months	By using partners such as Abbeycroft, SCC Libraries Service, Active Suffolk, Feel Good Suffolk.
Supporting Businesses	Explore incentives to encourage traders to become permanent.	6-9 months	Work with new and existing traders to understand any barriers to becoming permanent and explore incentives to mitigate these
Supporting Businesses	Carry out a review of the market licence	9-12 months	To refresh and update the MLR to reflect

Appendix 1: Market Development Plans

	regulations (MLR).		the way markets need to operate now and, in the future,
Supporting Businesses	Review current operational costs.	9-12 months	To review the cost of delivering markets and to look at potential ways to save to reinvest into the market
Supporting Businesses	Develop a clear Inclement Weather Policy.	9-12 months	To ensure that there is clear guidance on how markets operate in cases of severe weather warning and what measure can be put in place
Supporting Businesses	Investigate measures to further streamline admin and finance procedures.	9-12 months	To review the existing processes for managing the markets, bookings, and finances
Working with the community	Update and engage with local members and partners on strengths, weaknesses, and opportunities at their markets.	9-12 months	To provide regular update to town stakeholders on progress and to review and issues or feedback
Working with the community	Carry out periodic customer research	12-18 months	To regularly check in with users and non-users of the market to understand what measures are working

Appendix 1: Market Development Plans

Caring for the environment	Investigate a waste and recycling scheme by looking at best practice and consulting with traders how this could work.	12-18 months	To begin to reduce the environmental impact of waste on the market and to reduce the associated costs involved.
Supporting Businesses	Review the first year of the development plan	12-18 months	To evaluate the activity of the first 12 months of the development plan and report to members and stakeholders
Supporting Businesses	Investigate a gazebo hire and purchase scheme for new traders	12-18 months	To offer a scheme whereby a trader can rent a gazebo and in turn purchase over time
Working with the community	Formalise links with higher education and West Suffolk College	12-18 months	To work closer with West Suffolk College to provide opportunities for young people to start a business on the market and to engage with the local community
Caring for the environment	Design and implement a market sustainability plan	12-18 months	To create a mechanism whereby less waste is generated by the market to benefit the environment and future sustainability of the market

Appendix 1: Market Development Plans

Marketing the markets	Work with tourism partners in the east of England to promote our markets as a visitor attraction	12-18 months	To ensure that West Suffolk markets are a key attraction of West Suffolk towns and are promoted to visitors
Working with the community	Work with other local authorities and town councils on how to develop a Suffolk or East Anglian market brand	18-36 months	Develop links with neighbouring authorities to share best practice, cross promote and work together

Brandon

Survey Summary

- 16 commented on Brandon
- 33% visit once a week; 44% a few times a month
- 50% satisfied with the current market; 6% dissatisfied.
- Positives – good location and quality produce
- Negatives – not enough stalls or variety

Brandon market is situated on the market square in the heart of the town and operates a weekly market on a Thursday.

Only 10 minutes from the A11 and approximately 40 miles from both Cambridge and Norwich, with an hourly train service to both, Brandon is also a service centre for the local population and American air force families.

The market in Brandon faces issues such as a lower number of stall and issues around parking however this market has grown in recent years with traders feeling supported. There are opportunities to attract more traders with a wider variety of offers in addition to introducing more entertainment and exploring specialised event markets in partnership with the community.

Theme	Action	Timeframe	Comments
Marketing the markets	Review the existing signage for market promotion	0-3 months	To ensure that the signage in the town is performing correctly
Working with the community	Work with partners to review the Christmas offer for 2025	0-3 months	Investigate the potential for the market to be a part of any Christmas events in the town
Supporting Businesses	Add permanent traders to West Suffolk Markets website.	3-6 months	To provide a directory of traders on the market including contact details and links to websites and social media
Supporting Businesses	Organise regular trader meetings.	3-6 months	To provide regular opportunities for traders to contact the right people in the team to discuss

Appendix 1: Market Development Plans

			any issues regarding the market and future initiatives
Working with the community	Encourage local businesses to use the market as a shop front.	3-6 months	Build relationships with shops and businesses in and around the town to encourage them to promote their business through the market
Working with the community	Promote the market as a community market with free stalls.	3-6 months	Engage with local community groups and charities to provide an alternative offer to the market
Supporting Businesses	Explore initiatives to boost footfall and trader attendance in January and February	3-6 months	Initiatives such as "January Sales" for the market to drive footfall and boost trader for traders in the quieter months
Supporting Businesses	Add events and special markets to help reinstate the Saturday market.	6-9 months	To explore the demand from traders and visitors for an additional market on a Saturday
Providing an experience	Investigate and implement the appropriate event market(s) for the town	6-9 months	Working with traders and stakeholders to understand what type of event will be suitable for the town
Supporting Businesses	Review market regulations for Brandon.	9-12 months	To take into account the individual difference and needs of the town when making

Appendix 1: Market Development Plans

changes to the rules
and regulations

Supporting Businesses	Develop a clear Inclement Weather Policy for Brandon.	9-12 months	To take into account the individual difference and needs of the town when considering this policy
Supporting Businesses	Expand the Young Trader Markets to cover Brandon	12-18 month	To introduce a Young Trader market

Bury St Edmunds

Survey Summary

- 101 commented on Bury St Edmunds
- 36% visit once a week; 31% a few times a month
- 41% satisfied with the current market; 8% dissatisfied; 2% very dissatisfied
- Positives – good variety, friendly atmosphere, quality produce
- Negatives – too many food stalls, lack of choice, decline in stall numbers.

The 'jewel in the crown of Suffolk' and the home of Saint Edmund, the original patron Saint of England, Bury St Edmunds is the largest town in West Suffolk.

Bury St Edmunds market is held in the Buttermarket/Cornhill/Traverse area of the town centre and operates a twice weekly provisions market on a Wednesday and Saturday. A "makers market" is also held on the first Sunday of each month (March to December)

The engagement identified some issues around the perceived excess of food vendors on the market with several suggestions to increase the variety of the offer in the town. There are opportunities however to support young and new traders to the market with the reported comradery among existing traders and a friendly atmosphere.

Theme	Action	Timeframe	Comments
Working with the community	Work with the BID/DMO to promote the market	0-3 months	Continue the relationship with the BID and DMO to promote the market to residents and further afield as a visitor attraction
Working with the community	Work with partners to review the Christmas offer for 2025	0-3 months	Investigate the potential for the market to be a part of any Christmas events in the town
Supporting Businesses	Add permanent traders to West Suffolk Markets website.	3-6 months	To provide a directory of traders on the market including contact details and links to websites and social media
Supporting Businesses	Organise regular trader meetings.	3-6 months	To provide regular opportunities for traders to contact the right people in the team to discuss any issues regarding the market and future initiatives

Appendix 1: Market Development Plans

Working with the community	Encourage local businesses to use the market as a shop front.	3-6 months	Build relationships with shops and businesses in and around the town to encourage them to promote their business through the market
Working with the community	Promote the market as a community market with free stalls.	3-6 months	Engage with local community groups and charities to provide an alternative offer to the market
Providing an experience	Use the Food Area as a focal point of the market and promote special offers and meal deals.	3-6 months	To draw visitors to a dedicated food area of the market and provide seating etc.
Providing an experience	Review the existing signage for market promotion	3-6 months	Undertake a signage audit to ensure that the signage is suitable for the needs of the market
Supporting Businesses	Explore initiatives to boost footfall and trader attendance in January and February	3-6 months	To promote a "January sale" to the market to encourage visitors and to incentivise and reward traders that attend in these months
Providing an experience	Provide additional seating, music and activities	6-9 months	To expand the current offer to attract people to visit the market and enjoy the experience
Providing an experience	Investigate a market day map for Wednesday and Saturday permanent stalls	6-9 months	To produce a market map showing the locations of permanent traders and other attractions to support visitors
Supporting Businesses	Review market regulations for Bury St Edmunds.	9-12 months	To consider the individual difference and needs of the town when making

Appendix 1: Market Development Plans

changes to the rules and regulations

Supporting Businesses	Develop a clear Inclement Weather Policy for Bury St Edmunds.	9-12 months	To consider the individual difference and needs of the town when considering this policy
Supporting Businesses	Review the charging structure based on supply and demand	9-12 months	To investigate any potential measures to improve the current charging structure of both weekly markets
Supporting Businesses	Review Wednesday pitch fees and Saturday casual trader rates.	9-12 months	To understand the differences between Wednesday and Saturday traders to find a measure to boost Wednesday traders

Clare

Survey Summary

- 16 commented on Clare
- 89% visit once a week; 11% every few months.
- 44% satisfied with the current market; 19% neutral.
- Positives – quality stalls, parking availability
- Negatives – small number of stalls, lack of choice

Clare has a rich history and boasts the title of Suffolk’s smallest town. It is home to a grand wool church, a ruined castle and Clare Priory, one of the oldest religious houses in England. The thriving picturesque town hosts a monthly market, a range of independent shops, cafes and restaurants.

With its independent retailers and tourist attractions as well as historic surroundings it has plenty to offer businesses, visitors and people who wish to call it home.

The engagement identified that users of the Clare market were very satisfied although the market is small there could be opportunity to explore attracting a wider variety to attend. Similarly, traders were also satisfied (75%) although some issues around the public realm were identified and coordination with shop opening times could be addressed.

Theme	Action	Timeframe	Comments
Working with the community	Work closely with the Clare Business Association to promote the towns offer	0-3 months	Build a relationship with the CBA and the Visit Clare brand to promote the market as a visitor attraction
Providing an experience	Review the existing signage for market promotion	0-3 months	Undertake a signage audit to ensure that the signage is suitable for the needs of the market
Working with the community	Work with partners to review the Christmas offer for 2025	0-3 months	Investigate the potential for the market to be a part of any Christmas events in the town
Supporting Businesses	Add permanent traders to West Suffolk Markets website.	3-6 months	To provide a directory of traders on the market including contact details and links to websites and social media

Appendix 1: Market Development Plans

Supporting Businesses	Organise regular trader meetings.	3-6 months	To provide regular opportunities for traders to contact the right people in the team to discuss any issues regarding the market and future initiatives
Working with the community	Encourage local businesses to use the market as a shop front.	3-6 months	Build relationships with shops and businesses in and around the town to encourage them to promote their business through the market
Working with the community	Promote the market as a community market with free stalls.	3-6 months	Engage with local community groups and charities to provide an alternative offer to the market
Supporting Businesses	Explore initiatives to boost footfall and trader attendance in January and February	3-6 months	To promote a "January sale" to the market to encourage visitors and to incentivise and reward traders that attend in these months
Working with the community	Engage with residents for input on the market	6-9 months	Continue to "Markets Matter" conversation with the community to understand what they want from a market and what they can do to support it
Supporting Businesses	Review market regulations for Clare.	9-12 months	To take into account the individual difference and needs of the town when making changes to the rules and regulations
Supporting Businesses	Develop a clear Inclement Weather Policy for Clare.	9-12 months	To take into account the individual difference and needs of the town when considering this policy

Appendix 1: Market Development Plans

Providing an experience

Investigate and implement the appropriate event market for the town

9-12 months

Working with traders and stakeholders to understand what type of event market will be suitable for the town

Haverhill

Survey Summary

- 41 commented on Haverhill
- 11% visit twice a week; 31% once a week, 11% every few months
- 49% very dissatisfied with the current market; 5% satisfied.
- Positives – friendly regular traders, makers market, nothing to like
- Negatives – not enough stalls, too small, no variety

Haverhill is the second largest town in West Suffolk and the centre has two distinct parts with retail focused on High Street and service provision on Queen Street. The market is situated in Market Square in between these areas and is ideally located to attract the town centre footfall.

The market is held twice weekly in addition to a monthly makers market during the season which attracts many traders and footfall to the town.

The issues highlighted by the engagement focus on the perceived lack of stalls and variety on offer, however those stall that are available were reported to be friendly with good produce in addition to the makers market.

There are clear opportunities for Haverhill around attracting more traders and a variety of products to invigorate the positive feeling around the market and drive footfall in addition to providing more support for existing traders in the town.

Theme	Action	Timeframe	Comments
Working with the community	Continue a relationship with the town council events	0-3 months	To continue working in partnership to ensure that markets can add to other events that are delivered in the town
Working with the community	Offer local charities free trading to promote causes	0-3 months	To provide the opportunity for alternative stalls on the market to promote good local causes
Supporting Businesses	Regularly provide information to traders about business support and funding available	0-3 months	To support businesses that are looking to grow or expand by signposting them to the appropriate business support on offer
Working with the community	Work with partners to review the Christmas offer for 2025	0-3 months	Investigate the potential for the market to be a part of any Christmas events in the town

Appendix 1: Market Development Plans

Supporting Businesses	Add permanent traders to West Suffolk Markets website.	3-6 months	To provide a directory of traders on the market including contact details and links to websites and social media
Supporting Businesses	Organise regular trader meetings.	3-6 months	To provide regular opportunities for traders to contact the right people in the team to discuss any issues regarding the market and future initiatives
Working with the community	Encourage local businesses to use the market as a shop front.	3-6 months	Build relationships with shops and businesses in and around the town to encourage them to promote their business through the market
Working with the community	Promote the market as a community market with free stalls.	3-6 months	Engage with local community groups and charities to provide an alternative offer to the market
Marketing the markets	Investigate marketing opportunities to new housing sites	3-6 months	To develop a plan to attract residents to the new housing in and around Haverhill that report not to use the town centre
Working with the community	Work with local businesses in and out of town to use the market as a "shopfront"	3-6 months	Build relationships with shops and businesses in and around the town to encourage them to promote their business through the market
Providing an experience	Review the existing signage for market promotion	3-6 months	Undertake a signage audit to ensure that the signage is suitable for the needs of the market

Appendix 1: Market Development Plans

Supporting Businesses	Explore initiatives to boost footfall and trader attendance in January and February	3-6 months	To promote a "January sale" to the market to encourage visitors and to incentivise and reward traders that attend in these months
Providing an experience	Investigate vacant units for pop up/indoor markets	6-9 months	To investigate the potential for a market space outside of the regular market days utilising a vacant unit in the town centre
Supporting Businesses	Build on the success of Makers Markets with additional Saturday speciality	6-9 months	To review the demand for an additional speciality market in the town and understand the measures needed to deliver
Working with the community	Ensure the market is a part of any future High St redevelopment	6-9 months	By working closely with the project lead for Haverhill High St to ensure that the market is a consideration in this project
Supporting Businesses	Review market regulations for Haverhill.	9-12 months	To take into account the individual difference and needs of the town when making changes to the rules and regulations
Supporting Businesses	Develop a clear Inclement Weather Policy for Haverhill.	9-12 months	To take into account the individual difference and needs of the town when considering this policy
Providing an experience	Investigate and implement the appropriate event market for the town	9-12 months	Working with traders and stakeholders to understand what type of event market will be suitable for the town

Mildenhall

Survey Summary

- 27 commented on Mildenhall
- 48% visit once a week; 9% rarely
- 44% dissatisfied with the current market; 15% satisfied.
- Positives – good variety, friendly regular traders, location
- Negatives – lack of stalls, lack of variety and choice, too many food stalls

A traditional weekly market on Fridays has been held regularly since 1412, when a royal market charter was first granted. The market is still held in the Market Place every Friday.

There are plenty of regular stalls to explore including: local fruit and vegetables, fresh fish, authentic Thai food, key cutting and shoe repairs.

Mildenhall engagement identified several issues around the lack of stalls and offer available to customers but highlighted the opportunities to improve the market with better promotion in the town, increased support to new and existing traders in addition to working with the community.

Theme	Action	Timeframe	Comments
Providing an experience	Review the existing signage for market promotion	0-3 months	Undertake a signage audit to ensure that the signage is suitable for the needs of the market
Supporting Businesses	Revise the market plan to better use the space	0-3 months	Explore the use of the existing space and trial new layout solutions in consultation with the traders
Working with the community	Work with partners to review the Christmas offer for 2025	0-3 months	Investigate the potential for the market to be a part of any Christmas events in the town
Working with the community	Work with Mildenhall Town Council on market delivery	3-6 months	Investigate the potential for partnership working in relation to gazebo storage, set up and market promotion.
Supporting Businesses	Add permanent traders to West Suffolk Markets website.	3-6 months	To provide a directory of traders on the market including contact details

Appendix 1: Market Development Plans

and links to websites and social media

Supporting Businesses	Organise regular trader meetings.	3-6 months	To provide regular opportunities for traders to contact the right people in the team to discuss any issues regarding the market and future initiatives
Working with the community	Encourage local businesses to use the market as a shop front.	3-6 months	Build relationships with shops and businesses in and around the town to encourage them to promote their business through the market
Working with the community	Promote the market as a community market with free stalls.	3-6 months	Engage with local community groups and charities to provide an alternative offer to the market
Marketing the markets	Improve the awareness of the market to the USAFE	3-6 months	Build on the relationship with the bases in West Suffolk and develop a targeted marketing campaign to the families stationed there
Working with the community	Build relationships with local craft groups	3-6 months	Establish a relationship with local craft group to build a core group to trial makers markets in Mildenhall
Working with the community	Encourage local businesses to flexibly use the market as a shopfront	3-6 months	Build relationships with shops and businesses in and around the town to encourage them to promote their business through the market
Working with the community	Work with partners to highlight the tourist offer and	3-6 months	To create a package of attractions in Mildenhall and work with partners to

Appendix 1: Market Development Plans

	develop links with Mildenhall Museum.		promote what the town has to offer around the market and beyond
Supporting Businesses	Investigate a Friday Makers Market	3-6 months	Understand the demand and potential for a markers market on a Friday in Mildenhall
Marketing the markets	Work with Sainsburys on market promotions	3-6 months	To work in partnership to signpost customers to the market and investigate cross promotional offers
Supporting Businesses	Explore initiatives to boost footfall and trader attendance in January and February	3-6 months	To promote a "January sale" to the market to encourage visitors and to incentivise and reward traders that attend in these months
Providing an experience	Explore the potential for other types of trading such as "car boot" stalls	6-9 months	Understand the potential and demand to draw a new style of trading into the market to drive footfall to attract more permanent regular traders
Providing an experience	Investigate using additional space inside the shopping centre.	6-9 months	Work with property to understand the appetite of the landowners to use space in and around the shopping centre
Supporting Businesses	Review market regulations for Mildenhall.	9-12 months	To consider the individual difference and needs of the town when making changes to the rules and regulations
Supporting Businesses	Develop a clear Inclement Weather Policy for Mildenhall.	9-12 months	To consider the individual difference and needs of the town when considering this policy

Appendix 1: Market Development Plans

Providing an experience	Investigate and implement the appropriate event market for the town	9-12 months	Working with traders and stakeholders to understand what type of event market will be suitable for the town
Supporting Businesses	Expand the Young Trader Markets to cover Mildenhall	12-18 month	To introduce a Young Trader market

Newmarket

Survey Summary

- 20 commented on Newmarket
- 31% a few times a month; 6% once a month
- 65% very dissatisfied with the current market; 5% satisfied.
- Positives – friendly traders, convenient location, many noting ‘nothing to like’.
- Negatives – lack of stalls, inconvenient location, lack of variety.

The unique historic town and local area is a visitor attraction in itself with much to offer for all the family. It has a range of high-quality places to stay and eat, including independent retailers offering local goods.

The market square hosts the twice weekly market in addition to a monthly makers market

Newmarket had the highest dissatisfaction levels across all market towns, with 75 per cent of respondents selecting ‘very dissatisfied’ or ‘dissatisfied’ and the challenges raised focus on the lack and variety of the stall and the current location of the market on Market Square

There is opportunity in Newmarket to build the market trader base by improving the public realm of the current market to attract new and different types of traders while working in partnership with the town council to continue to work on a High St move in the future.

Theme	Action	Timeframe	Comments
Working with the community	Work with the Guineas to jointly promote events	0-3 months	To work in partnership to cross promote the market and the shopping centre and explore ways of working together
Working with the community	Work with the BID/DMO to promote the market	0-3 months	Continue the relationship with the BID and DMO to promote the market to residents and further afield as a visitor attraction
Providing an experience	Improve the appearance of the town centre	0-3 months	Utilising a set budget to improve the look and feel of the market square to attract more visitors and traders to a welcoming environment

Appendix 1: Market Development Plans

Providing an experience	Investigate with partners a lower speed limit for the High St	0-3 months	To understand the possibility and impact of lower speed limit on the high st on footfall and pedestrian movements
Working with the community	Work with partners to review the Christmas offer for 2025	0-3 months	Investigate the potential for the market to be a part of any Christmas events in the town
Working with the community	Work with NCF on market rejuvenation	0-3 months	The "Aligning Newmarket's stakeholders around a set of transformative interventions" report includes interventions around market rejuvenation and this should be done in collaboration
Providing an experience	Review the existing signage for market promotion	0-3 months	Undertake a signage audit to ensure that the signage is suitable for the needs of the market
Supporting Businesses	Add permanent traders to West Suffolk Markets website.	3-6 months	To provide a directory of traders on the market including contact details and links to websites and social media
Supporting Businesses	Organise regular trader meetings.	3-6 months	To provide regular opportunities for traders to contact the right people in the team to discuss any issues regarding the market and future initiatives
Working with the community	Encourage local businesses to use the market as a shop front.	3-6 months	Build relationships with shops and businesses in and around the town to encourage them to promote their business through the market

Appendix 1: Market Development Plans

Working with the community	Promote the market as a community market with free stalls.	3-6 months	Engage with local community groups and charities to provide an alternative offer to the market
Providing an experience	Investigate a market day "pick up point"	3-6 months	To allow a dedicated location for visitors to be dropped off and picked up with their goods from the market
Supporting Businesses	Explore initiatives to boost footfall and trader attendance in January and February	3-6 months	To promote a "January sale" to the market to encourage visitors and to incentivise and reward traders that attend in these months
Providing an experience	Investigate the frequency of the market up to 7 days	6-9 months	Understand the potential and interest for more frequent market days in the town
Providing an experience	Explore the potential for other types of trading such as "car boot" stalls	6-9 months	Understand the potential and demand to draw a new style of trading into the market to drive footfall to attract more permanent regular traders
Supporting Businesses	Review market regulations for Newmarket.	9-12 months	To take into account the individual difference and needs of the town when making changes to the rules and regulations
Supporting Businesses	Develop a clear Inclement Weather Policy for Newmarket.	9-12 months	To consider the individual difference and needs of the town when considering this policy
Providing an experience	Investigate and implement the appropriate event	9-12 months	Working with traders and stakeholders to understand what type of

Appendix 1: Market Development Plans

	market for the town		event market will be suitable for the town
Providing an experience	Revisit the Newmarket High St scheme	18-36 months	To return to investigate the potential of implementing the Newmarket High St market scheme from 2024

West Suffolk Council Market Development: consultation survey summary

Contents

West Suffolk Council Market Development: consultation survey summary	1
Executive summary	2
Methodology	5
Section 1: About the respondents.....	5
Respondent location	6
Gender	8
Age and health-disability	8
Equalities information.....	9
Section 2: Visiting the markets.	9
Insights across all markets.....	9
Section 3: Brandon market.....	11
Overall	11
West Suffolk residents.....	12
Market traders.....	14
Business group.....	17
Visitors to West Suffolk markets	18
Section 4: Bury St Edmunds market	18
Overall	18
West Suffolk residents.....	19
Market traders.....	24
Town, parish, district, or county councillor	30
Community group	30
Visitors to West Suffolk markets	31
Other	32
Section 5: Clare market	33
Overall	33
West Suffolk residents.....	34
Market traders.....	35
Visitors to West Suffolk markets	38
Section 6: Haverhill market	39
Overall	39
West Suffolk residents.....	40
Market traders.....	43
Visitors to West Suffolk markets	44
Section 7: Mildenhall market.....	44
Overall	44
West Suffolk residents.....	45
Market traders.....	48
Visitors to West Suffolk markets	49
Section 8: Newmarket market.....	49
Overall	49
West Suffolk residents.....	50
Market traders.....	53
Visitors to West Suffolk markets	53
Other	54

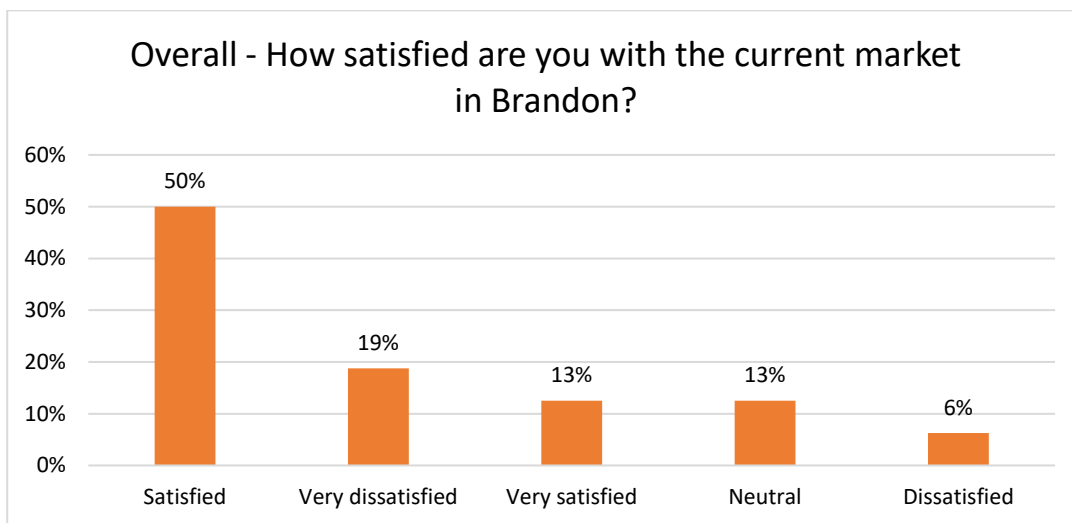
Equalities impact.....	54
Conclusion.....	54
Section 2: Visiting the markets.....	55
Section 3: Brandon market	55
Section 4: Bury St Edmunds market.....	55
Section 5: Clare market.....	56
Section 6: Haverhill market.....	56
Section 7: Mildenhall market.....	56
Section 8: Newmarket market.....	57

Executive summary

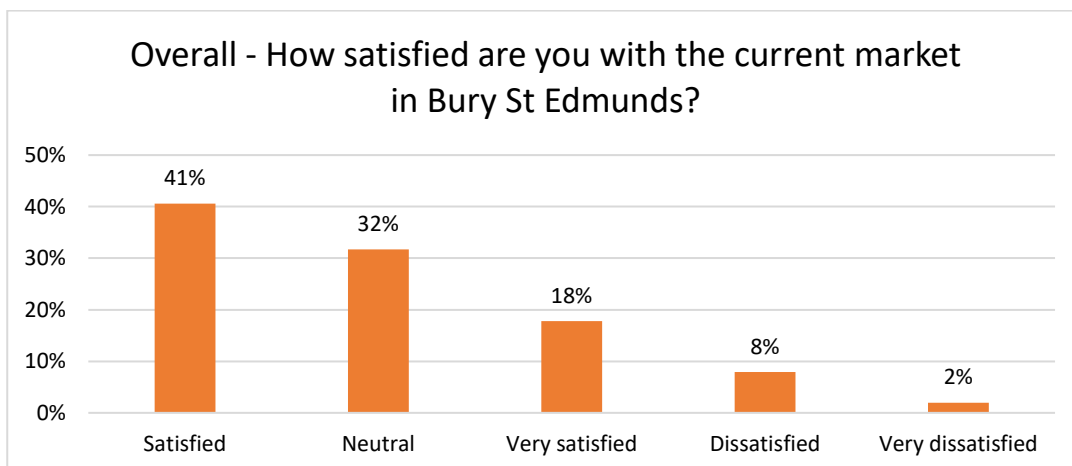
West Suffolk Council launched a public consultation between 14 May to 31 May 2024 to gather the views, insights and opinions from a wide range of people in order to inform the Market Development Plan 2024. This will build on the Council’s 2021 Market Review, with an emphasis on how we develop individual market offers, building on the characteristics and potential customers for each of our six towns. This engagement is being done in several ways, including this online survey. The feedback from this survey and engagement with stakeholders will be used to shape the plan. A total of 189 respondents took part in the survey online.

The following charts summarise the overall satisfaction levels to emerge from the Market Development Plan 2024 survey:

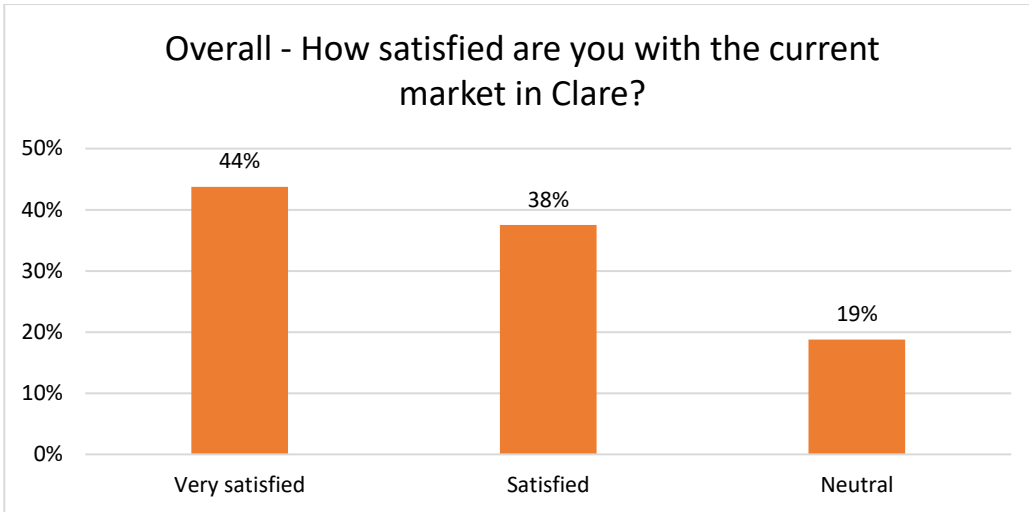
Brandon



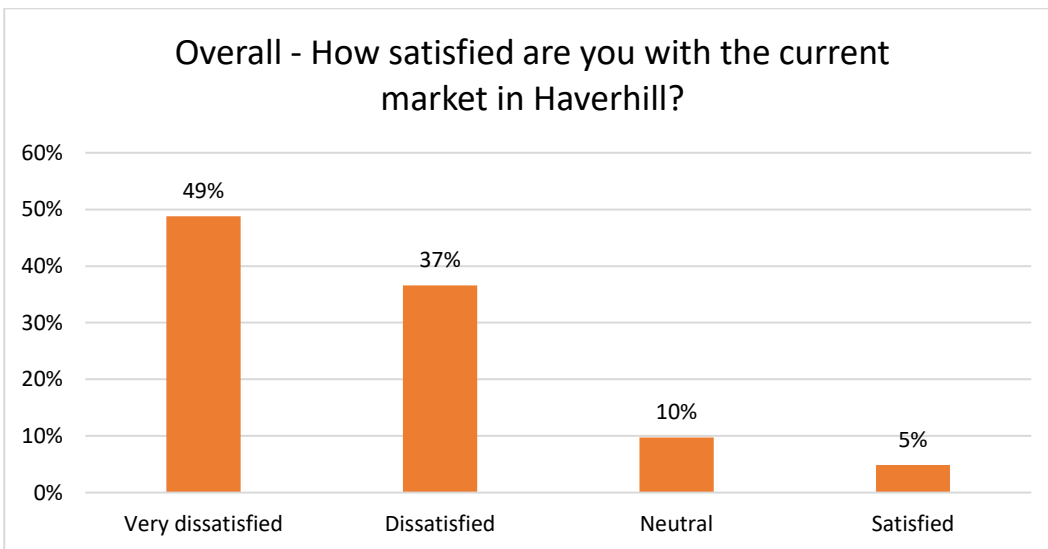
Bury St Edmunds



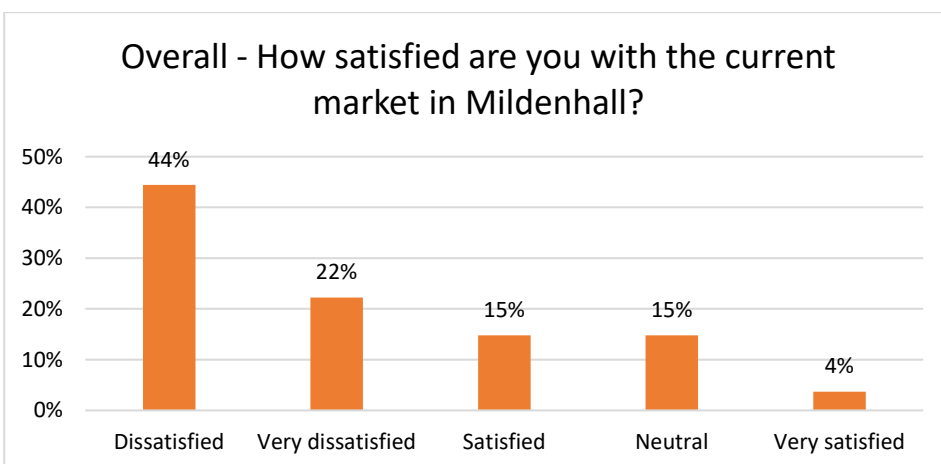
Clare



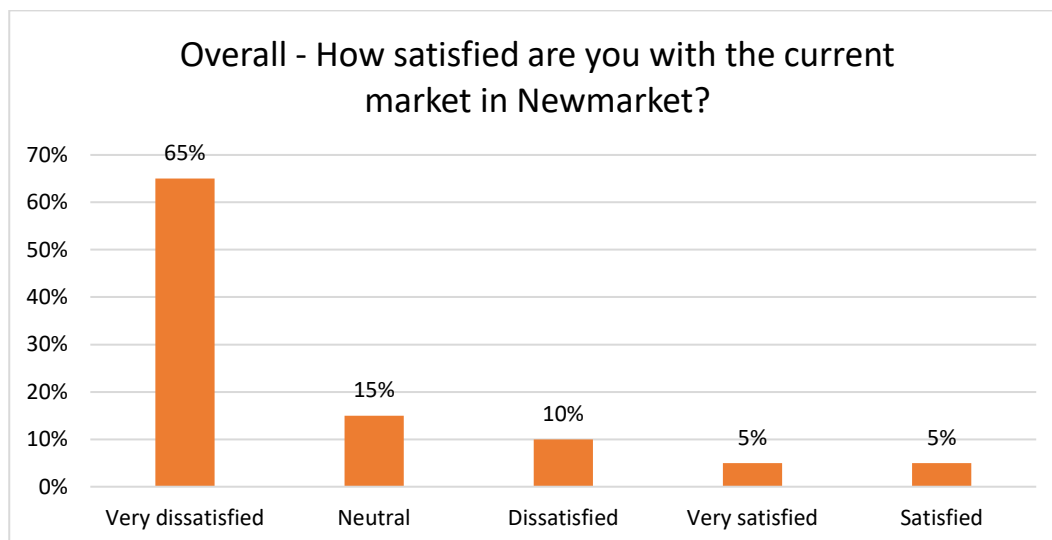
Haverhill



Mildenhall



Newmarket



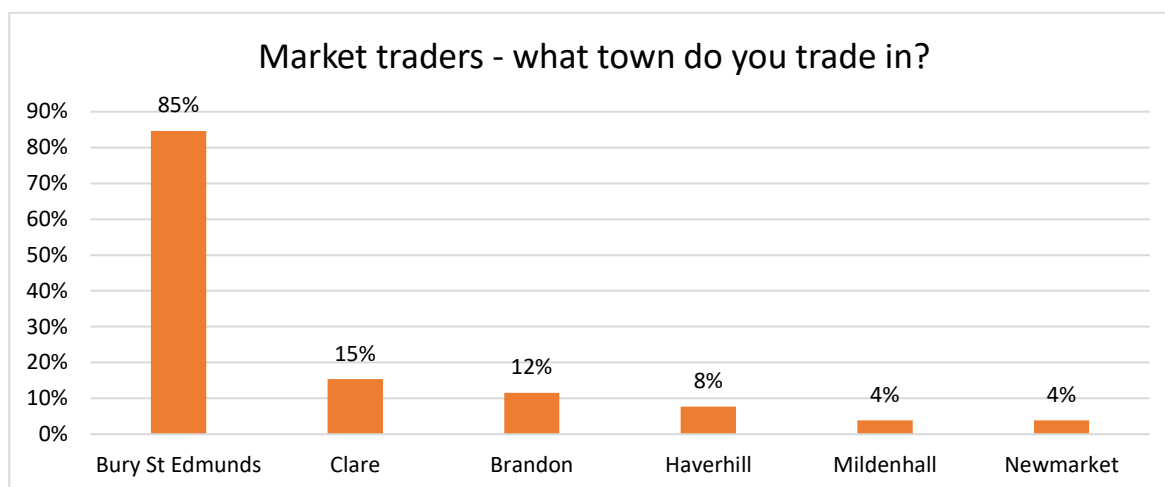
Methodology

6. An online survey was created, and was published through the media, West Suffolk Council website, social media, staff, councillors, and partner organisations. The council also undertook direct engagement with key stakeholders across the district, including market traders, visitors to the markets, community groups, a business groups and local councillors.
7. At the time the survey closed, 189 online responses had been submitted. This report outlines the results from the analysis of quantitative data and themes that can be drawn from the qualitative (free text) data.
8. Please note:
 - All questions are listed thematically to highlight the key findings of the consultation – which include multiple choice answers and free text responses on what they liked, disliked, areas of improvement and views on the future of the markets. Different questions were asked for market traders exclusively.
 - A sizeable part of this survey is comprised of free text responses. These have been analysed using standard manual techniques for free text analysis to examine respondent information and gauge support, which while highly effective are unable to fully eliminate any degree of judgement or subjectivity.

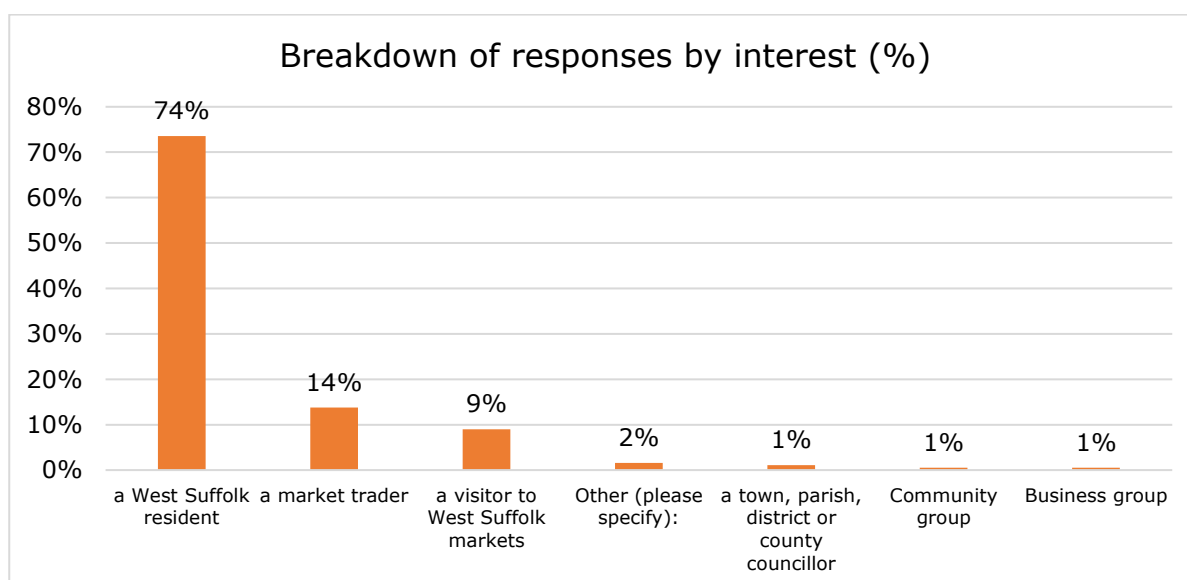
Section 1: About the respondents

9. Of a total of 189 respondents to the survey, the largest group of respondents were West Suffolk residents at 139 (74 per cent), followed by market traders at 26 (14 per cent).
10. All markets traders provided further details on which town they currently trade in.

11. 85 per cent (22) of market traders trade in Bury St Edmunds, 15 per cent (4) in Clare, 12 per cent (3) in Brandon, 8 per cent (2) in Haverhill, 4 per cent in both Mildenhall (1) and Newmarket (1).

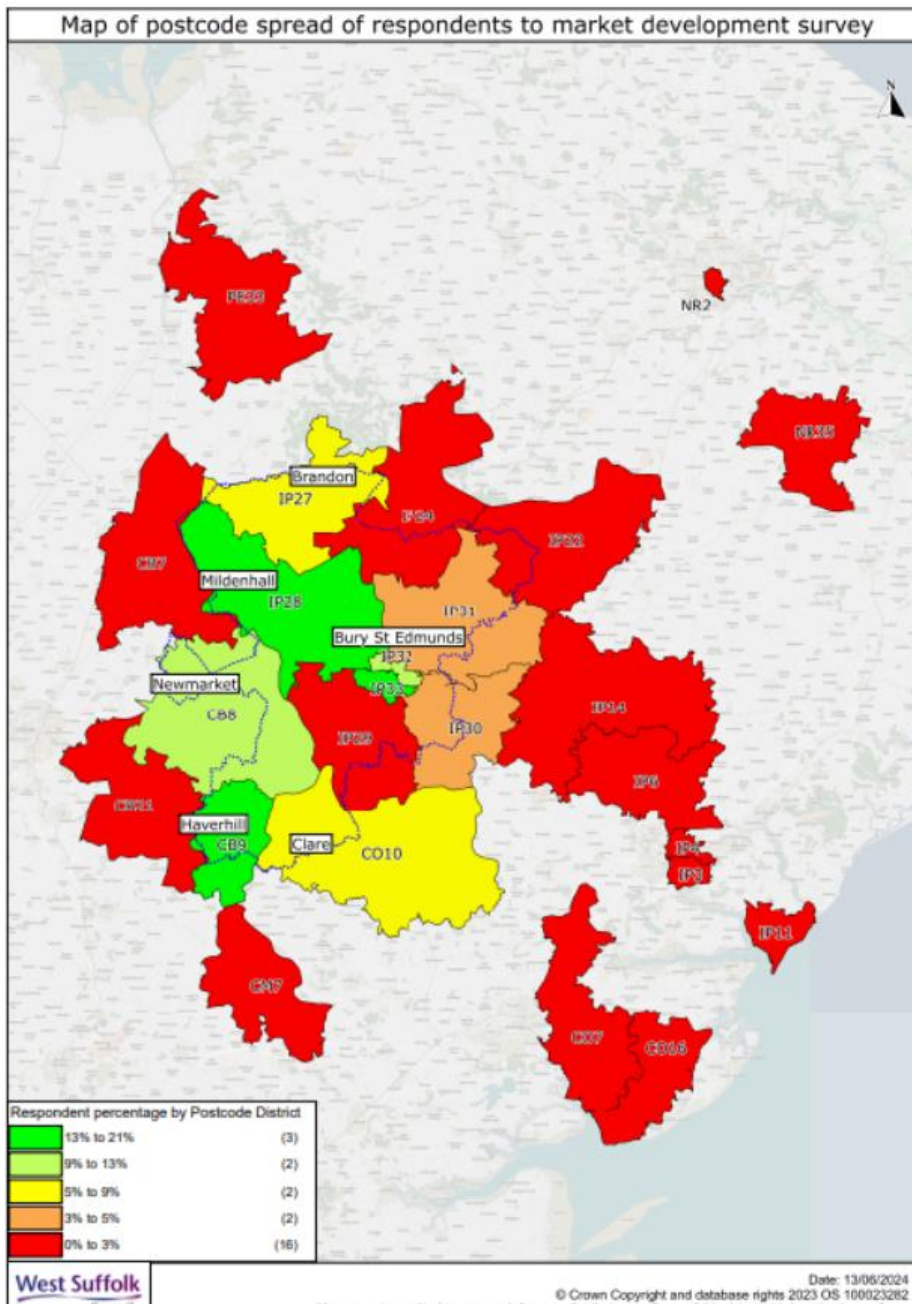


12. 17 (9 per cent) identified as visitors to West Suffolk markets.
13. 2 (1 per cent) respondents identified as councillors.
14. 1 (0.5 per cent) identified as a community group, being Suffolk Bitcoin.
15. 1 (0.5 per cent) responded as a representative of a business group, being the 'Facebook group for Brandon'.
16. A further 3 (2 per cent) responded as 'other' including a West Suffolk Council staff employee, a potential trader and a resident outside of West Suffolk.

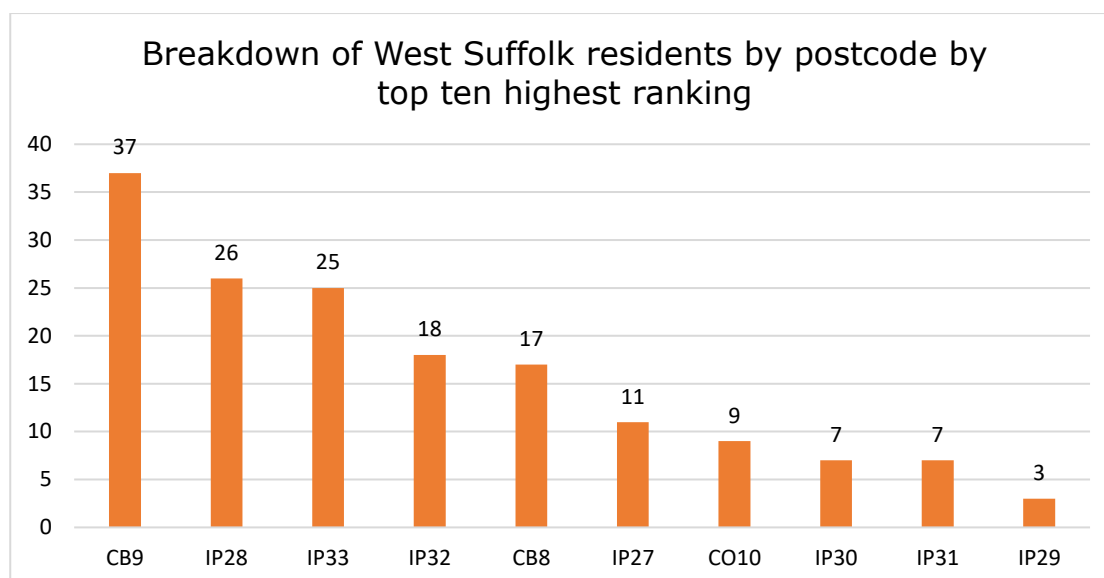


Respondent location

17. Out of the total respondents, 179 (95 per cent) provided veritable postcodes. Response distribution by postcode district is shown on the map below.



18. Out of the 179 respondents who provided a postcode, 139 (74 per cent) identified as West Suffolk residents with 49 per cent living in CB9, IP33 and IP28 postcodes.



Gender

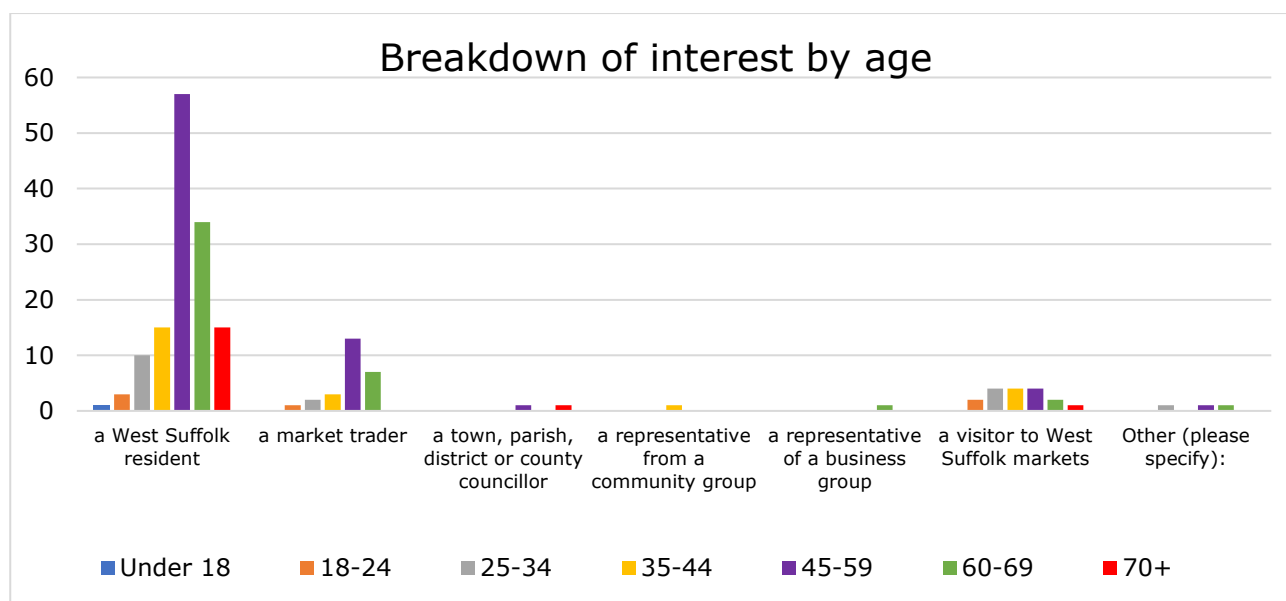
20. 182 respondents described their gender. Out of the total responses, the survey was completed by mostly female respondents, representing 64 per cent of the total. Male respondents represented 31 per cent, with 4 per cent stating that they would 'prefer not to say' and 0.5 per cent stating 'in another way'.

Age and health-disability

21. Out of 189 respondents, 185 provided their age category. The age breakdown (see table below) shows a larger proportion of older people completed the survey in comparison to those under 24; ages 45 to 70+ represent 75 per cent of the total.

Age breakdown of respondents		
Age categories	Percentage (%) in each category	West Suffolk Percentage (%) 2020
0-17	0.5	21.2
18-24	3.2	6.8
25-34	9.1	13.3
35-44	12.4	12
45-59	41	19.4
60-69	24.3	11
70+	9.2	16.4

22. A breakdown of the interest by age are as below.



23. Out of 189, 181 answered whether they have any long-standing illness, disability, or infirmity. 151 (83 per cent) answered 'No', and 39 (17 per cent) answered 'Yes'. The disability breakdown (see table below) shows a distribution proportionate to the West Suffolk population.

Long standing illness, disability, or infirmity breakdown of respondents		
Categories	Percentage (%) in each category	West Suffolk Percentage (%) 2021 (under the Equality Act)
Disabled	17	16.3
Not disabled	83	83.7

Equalities information

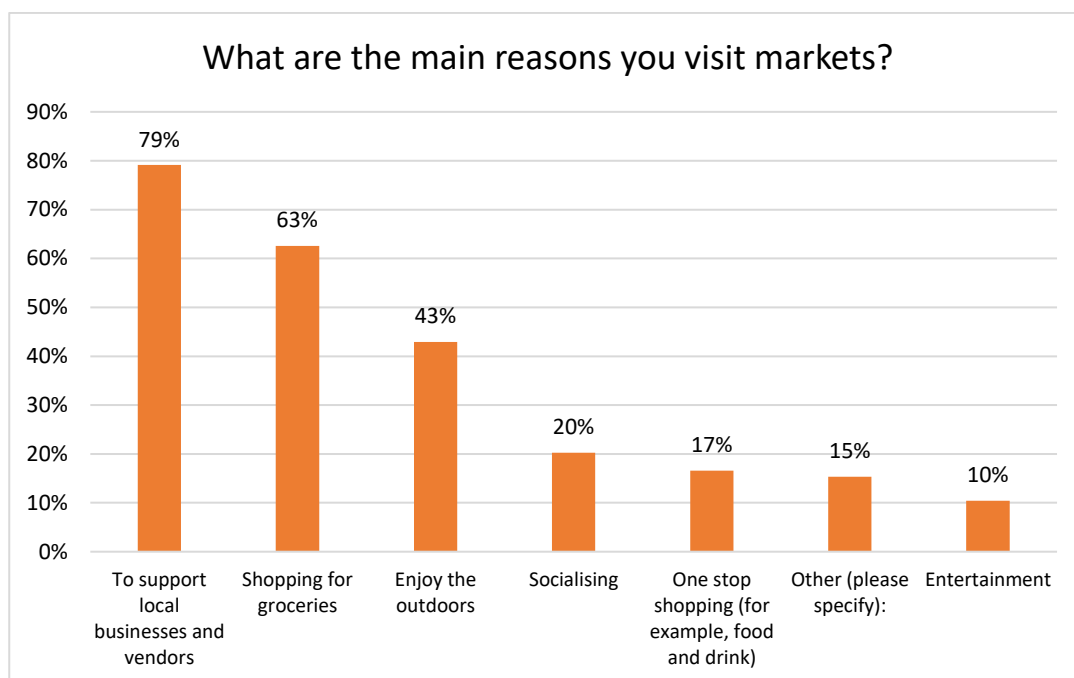
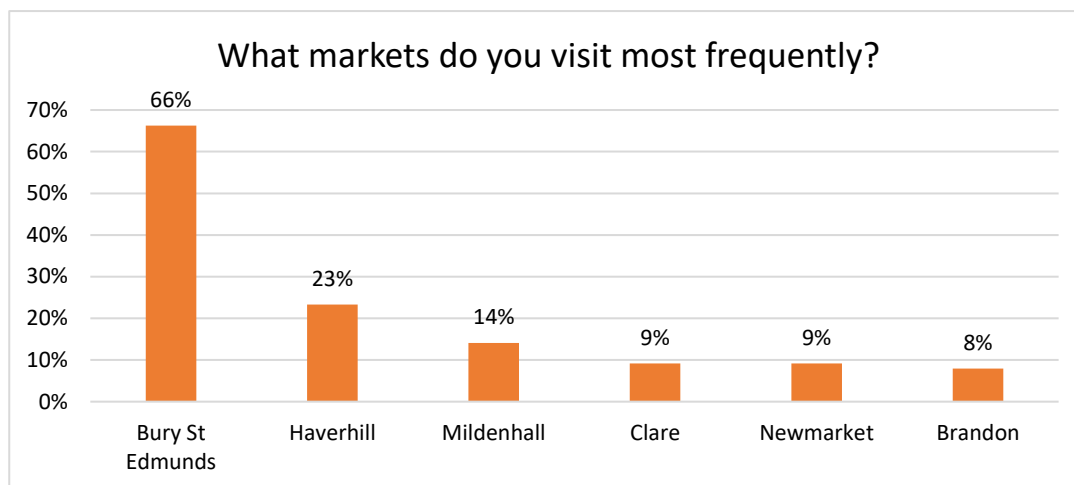
24. 180 respondents answered the question on ethnic origin. Out of all 180 respondents, 160 identified as English, Welsh, Scottish, Northern Irish or British (89 per cent). 12 (7 per cent) respondents identified as any other White background.
25. Four respondents identified as 'Irish' (2 per cent), a further respondent (0.5 per cent) identified as 'Caribbean', one respondent as 'White and Black Caribbean' (0.5 per cent) and two (1 per cent) as White and Asian.

Section 2: Visiting the markets.

Insights across all markets

26. All respondents, but market traders, were asked a series of multiple-choice questions around what markets they visit most frequently in West Suffolk, what the main reasons were for visiting the markets and factors that would influence their decision to visit a market.

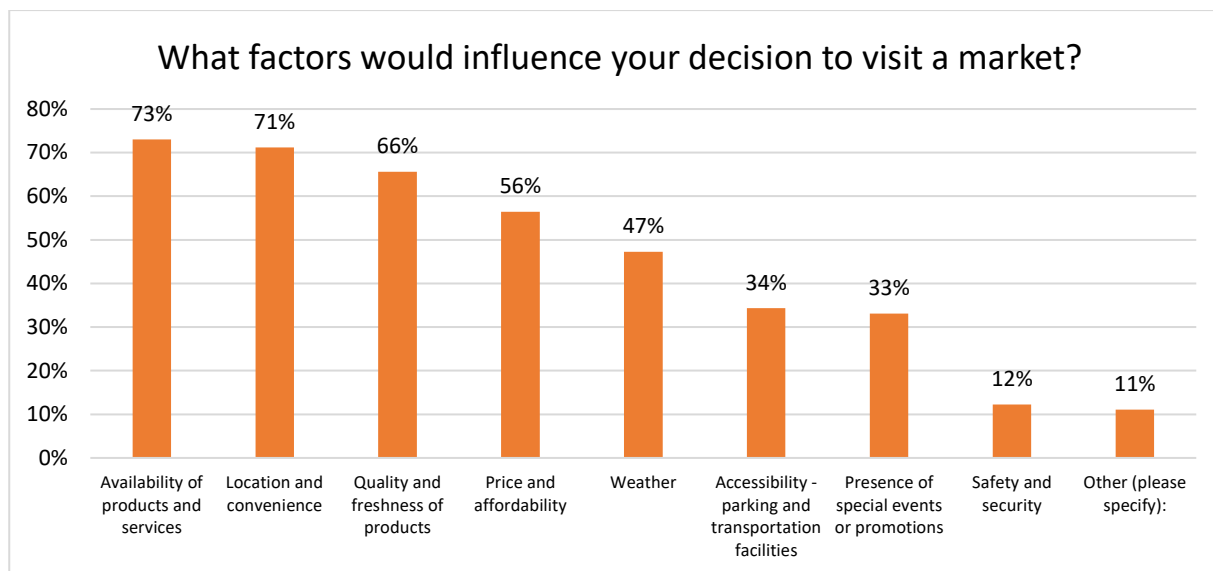
27. 163 respondents provided an answer to all three questions as below.



28. 25 respondents provided free text for 'other' to the question, 'what the main reasons are you visit markets', as below.

Reasons	Frequency
Convenience and close location	6
Quality fresh food produce without the plastic packaging	4
See how many stalls there are and what it offers	5
Value for money and to find deals	3
Opportunity to spend time with family	2
To visit craft stalls	1

Reasons	Frequency
Visiting businesses that accept bitcoin for payment	1
To visit the Makers Market	1
Shop for plants	1
Give praise to stall holders	1



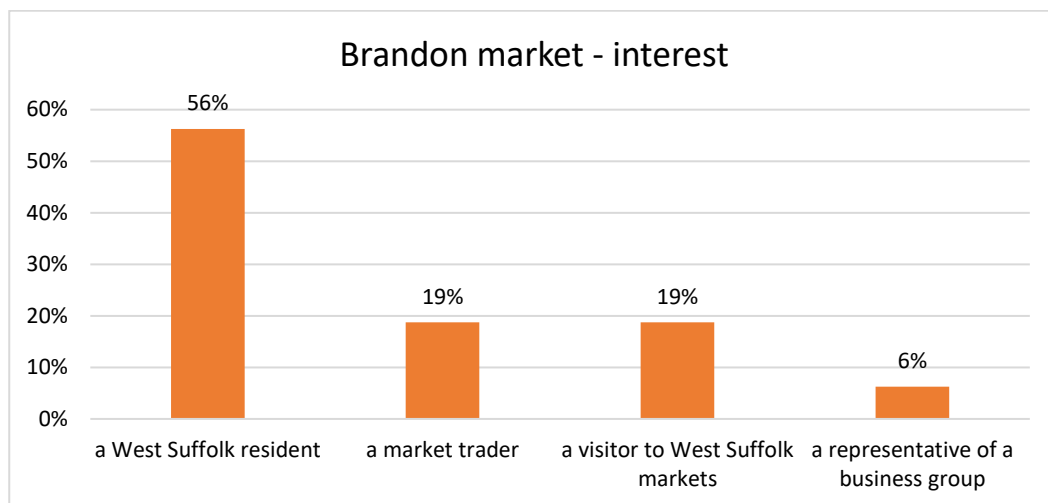
29. 18 respondents provided free text for 'other' to the question, 'what factors would influence your decision to visit a market', as below.

Factors	Frequency
More variety of vendors and stalls	5
Free or cheap parking	2
Size	1
Ability for customer to how pay they choose	1
More businesses taking bitcoin	1
Consider a Friday night food truck, local music etc like Ely and Altrincham	1
Timings – request to extend these to enjoy the afternoon	1
Visits are often combined with other errands	1
Enable the full amount of market traders on Wednesday in Bury St Edmunds	1

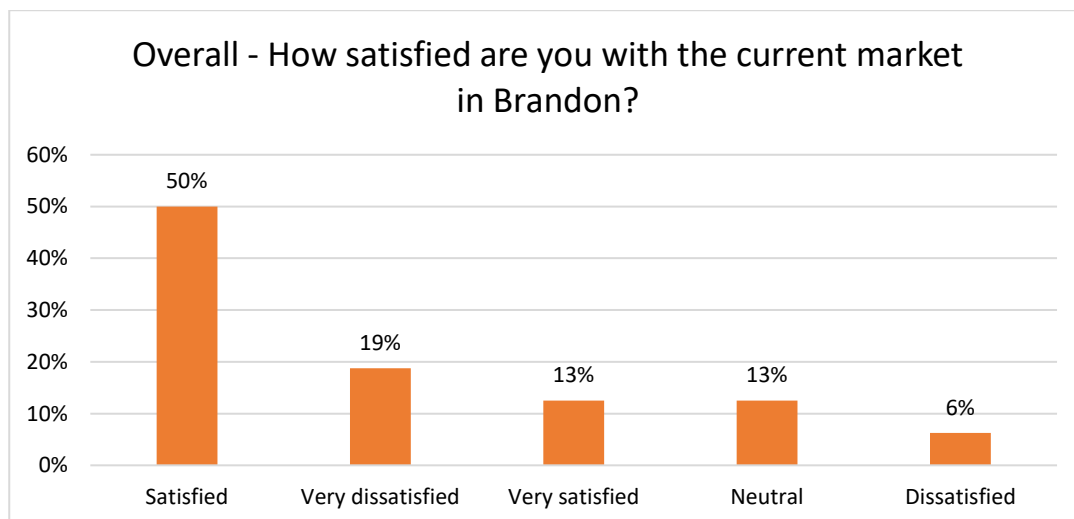
Section 3: Brandon market

Overall

30. A total of 16 respondents commented on the Brandon market in West Suffolk. Of these, 9 were residents (56 per cent), 3 were market traders (19 per cent), one business group (6 per cent), 3 visitors to West Suffolk (19 per cent).

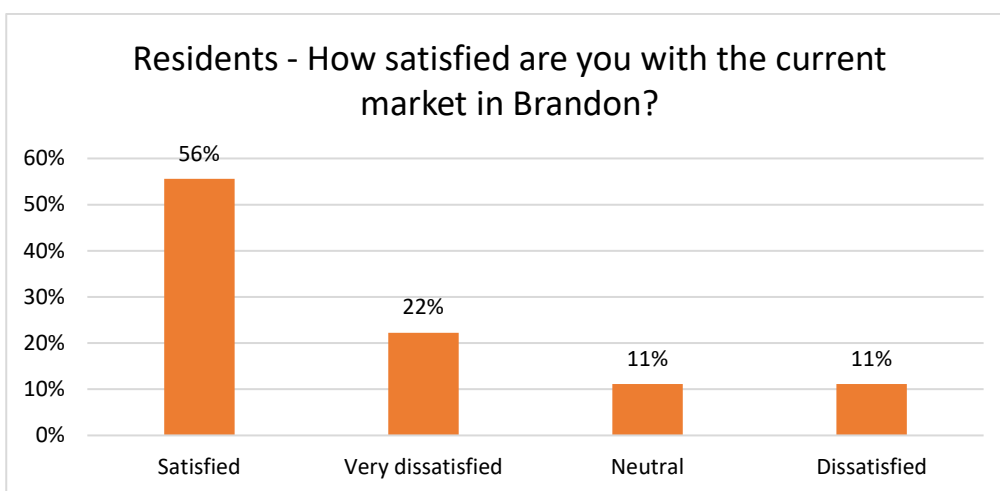
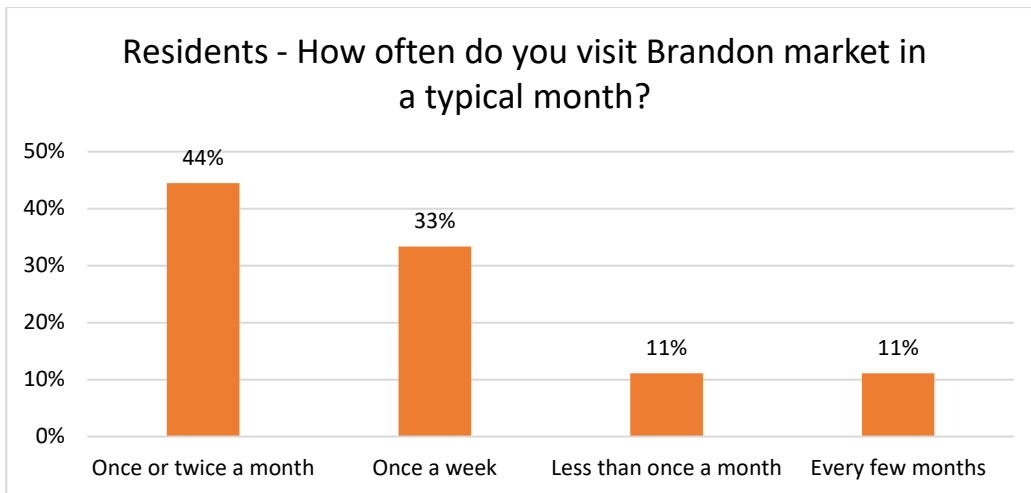


31. Respondents were asked a series of multiple-choice questions such as frequency of their visits to the market in a typical month (except for market traders) and their satisfaction ratings.
32. They were then asked what they liked, disliked, improvements for the market and how they see it developing in the future. The latter four responses were free text.
33. All respondents provided an answer to the multiple-choice question as below.



West Suffolk residents

34. Out of a total 16 respondents, 9 were residents providing a mix of multiple choice and free text responses to the below:



35. 8 residents provided free text responses as to what they like at the Brandon market as below.

Positives	Frequency
Affordable prices	1
Quality produce	2
Convenient location	1
Good sense of community	1
Spacious good location	7
Reasonable and interesting variety	2

36. 8 residents provided free text responses as to what they dislike at the Brandon market as below.

Negatives	Frequency
No parking for disabled	1
Closes too soon	1

Negatives	Frequency
Not enough stalls nor variety such as limited fruit and veg	5
Very small	1

37. 6 residents provided free text responses when asked to provide suggestions for improvements as below.

Suggestions for improvement	Frequency
More stalls	3
More seating	1
Open longer during the day	2
More variety such as a cake stall, a refill eco stall, cheese and pies.	2

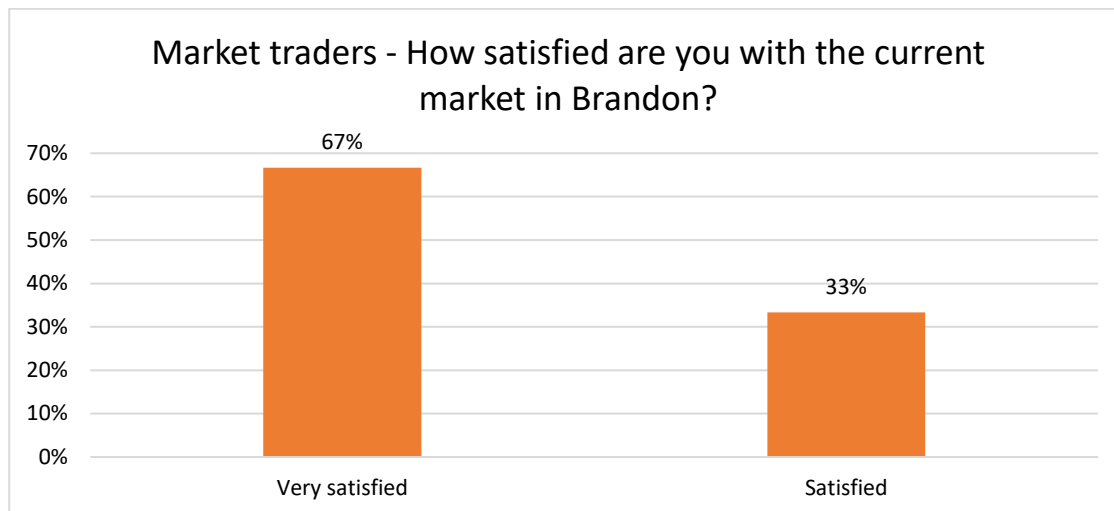
38. 7 residents provided free text responses when asked how they see the market developing in the future as below.

Suggestions for development	Frequency
Undercover area for use in bad weather	1
Saturday market would be better	1
Add local entertainment	1
Unable to compete with online shopping	1
Nothing	2
Bigger space	1
More traders of a diverse range	2

Market traders

39. Out of 101 respondents, 3 responded as market traders in Brandon. Duration of trading in the market and satisfaction levels as below.





40. All three market traders provided commentary on what they liked about the market as below.

Positives	Frequency
Well organised	1
Good selection of stalls	1
Sensible start and finish time	1
Great buzz	1
Council staff officer friendly	2
Good atmosphere with customers	2
Good Facebook page advertising stalls well	1
Friendly amongst traders	1

41. All three market traders provided commentary on what they disliked about the market as below.

Negatives	Frequency
Nothing	3
Could do with more stalls attending on a regular basis	1
Good selection of stalls	1

42. All three market traders provided suggestions for improvement as below.

Suggestions for improvement	Frequency
Nothing	2
More traders	1

43. All three market traders provided suggestions for development as below.

Suggestions for development	Frequency
Continue being a friendly market	1
More traders	2

Further questions for market traders in Bury St Edmunds

44. All three traders provided commentary on the positive aspects of being a market trader in Brandon as below.

Positive aspects of being a trader	Frequency
Flexibility	1
Moving around to go where the customers are	1
Good atmosphere selling to locals	1

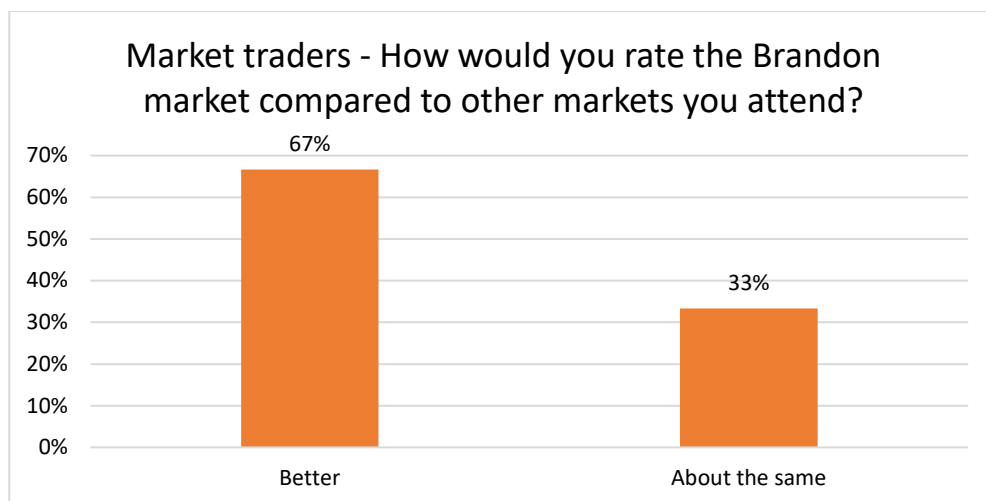
45. All three traders provided commentary on the challenges of being a market trader in Brandon as below.

Challenges of being a trader	Frequency
Weather	3
Difficult to find somewhere to park vehicle for the length of time trading which costs money to do so on top of pitch fee.	1

46. All three traders provided suggestions for improvements for the market to better support traders as below.

Improvements to better support traders	Frequency
Traders are supported	1
Improve layout	1
Have understanding council staff, no penalties if a trader is unable to make it to the market. A ban on top of loss of income is unproductive	1

47. All market traders gave a rating on how they compare the Brandon market in comparison to other markets they attend as below.



- 48. Two market traders explained their suggestion with one providing an example. One trader mentions that there is less pressure at Brandon and the other attends Christchurch Park, with staff there on hand to help throughout the day.
- 49. All three market traders gave a rating on how they compare the Brandon market in comparison to other markets they attend as below.



- 50. Two traders explained their selection with one mentioning that Brandon is a friendly market and well run.

Business group

- 51. Out of 16 respondents, one responded as representative of a business group in Brandon. This was the Facebook group for Brandon representing the Brandon high street.
- 52. When asked how often they visit the market, they mentioned 'a couple times a year'.
- 53. When asked how satisfied they are with the current market, they mentioned 'very dissatisfied'.

54. When asked what they liked about the market, they wrote 'not much'.
55. When asked what they disliked about the market, they wrote that 'shops in Brandon are struggling to make sales and people are allowed to trade there with the same as Brandon shops goods'.
56. When asked for suggestions for improvement, they provided no commentary.
57. When asked how they see the market developing in the future, they wrote that [they] do not, with Amazon and online retail far more convenient for customers.

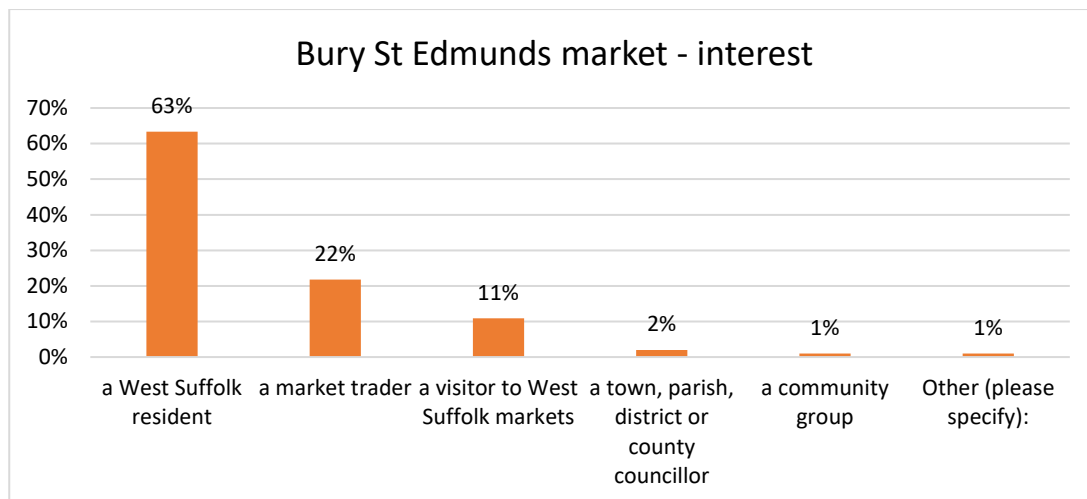
Visitors to West Suffolk markets

58. Out of 16 respondents, three responded as visitors to West Suffolk markets.
59. When asked how often they visit the market, two mentioned 'once or twice a month' and one 'once a week'.
60. When asked how satisfied they are with the current market, two visitors chose 'satisfied' and one chose 'neutral'.
61. When asked what they liked about the market, one visitor wrote that stall holders are friendly. Another mentioned the variety of stalls is good, with flowers, bakery goods, kids today's, dog beds etc... for sale.
62. When asked what they disliked, one visitor mentioned that it can benefit from more stalls. Another visitor mentioned it is inconsistent with many of the stalls irregular.
63. When asked what improvements they suggest for the market, one visitor wrote 'more regular traders'.
64. When asked how they see it developing in the future, one visitor wrote '[they do not]' due to the inconsistency of stalls.

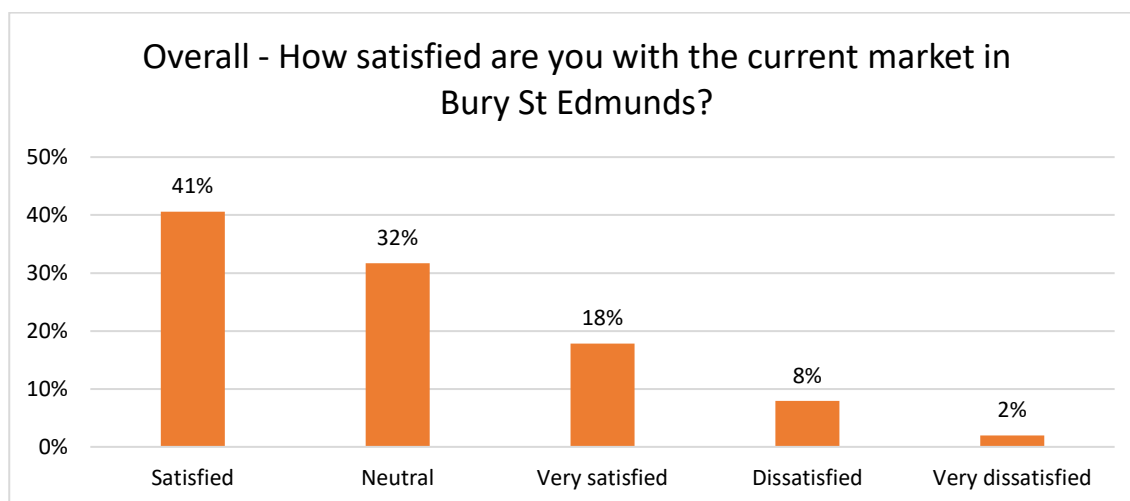
Section 4: Bury St Edmunds market

Overall

65. A total of 16 respondents commented on the Bury St Edmund's market in West Suffolk. Of these, 64 were residents (63 per cent), 22 were market traders (20 per cent), two councillors (2 per cent), one community group (1 per cent), 11 visitors to West Suffolk (11 per cent) and one 'other' identifying as West Suffolk Council staff (1 per cent).

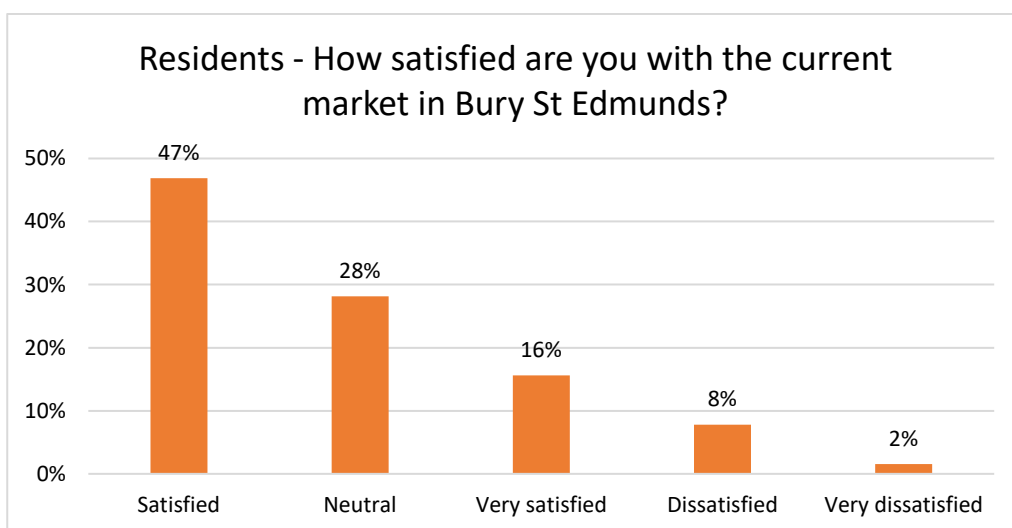
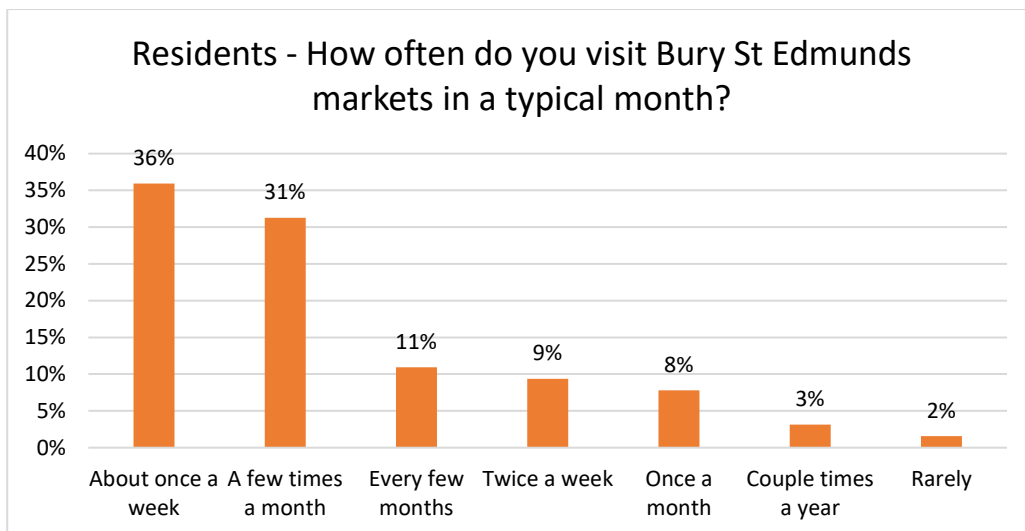


- 66. Respondents were asked a series of multiple-choice questions such as frequency of their visits to the market in a typical month (except for market traders) and their satisfaction ratings.
- 67. They were then asked what they liked, disliked, improvements for the market and how they see it developing in the future. The latter four responses were free text.
- 68. All respondents provided an answer to the multiple-choice question as below.



West Suffolk residents

- 69. Out of 101 respondents, 64 identified as West Suffolk residents, providing a mix of multiple choice and free text responses to the below:



70. 55 residents provided free text responses as to what they like at Bury St Edmunds market as below.

Positives	Frequency
Good variety and choice of stalls such as food, produce, local products etc...	24
Friendly atmosphere with stall holders and people	15
Quality of produce, food stalls, plants, items	11
Price	1
Spacious good location	7
Good to see businesses	1
Inclusion of long standing, trusted local and authentic makers	4
Regular events	1
Specialist stalls available like watch battery replacement	1
Community feeling	1

Positives	Frequency
Good food and drink, deli offer and street food stalls	3
Good buzz/ambiance/vibrant	4
Traders have expert knowledge on their produce or products to build a rapport with	3
Traditional shopping experience	1
Good browse	1
Ability to avoid plastic	1

71. 48 residents provided free text responses when asked to tell us what they disliked as below.

Negatives	Frequency
Lack of parking for disabled	1
High parking costs	1
Too many food trucks/vendors/takeaway stalls	10
Lack of stalls and a decline in numbers	7
More local producers on the regular market. Should be sold locally at reasonable prices, not at farmers markets once a month.	2
Lack of variety and choice	5
Too many fruits and veg stalls	1
No seating opportunities in the market	1
Poor quality of items, fruit, and vegetables	4
Vans should remain so stall holders can store things in dry place	1
No new stall holders with different items being brought into the market	3
Some stalls are expensive	2
Tacky, market needs cleaning	2
Closes too early	1
Some vendors seem xenophobic/racist	1
Provides no benefit as supermarkets and online is quicker and easier and cheaper than a market.	1
Needs more clothing stalls, needs a better mix of vendors.	1
Antisocial behaviour	1
No covered walkway between the stalls to mitigate against weather	1
Wednesday market sparse sometimes	1
The charges made by the council	1

72. 50 residents provided free text responses when asked to provide suggestions for improvements as below.

Suggestions for improvements	Frequency
Parking for disabled people	1
Free parking in town, on market day	6
More support for traders and local shops, for example with affordable pitches	3
More specialty markets the way Ely operates. A second-hand market, eco market etc. even a food truck area	1
Nothing	3
More vendors and increase variety such as charity and artisan stalls	8
Allow stall holders to have vehicles/vans with them by stool	2
Better quality of food	1
Reduce the volume of street food vendors	2
The council to work with traders so they continue to attend the market such as with lower rents. Council to ensure variety of traders and that the goods sold are of a fair quality for the price paid.	3
Less vans blocking access	1
More live music and special events	2
Make the market footprint smaller when there are less stalls to avoid gaps	1
More table seating areas	6
Better management of businesses with pavement licences and outdoor seating	1
Increase affordability	1
Expand into Cornhill walk with smaller pop-up style business opportunities for small local startups.	1
Offer spaces for new people on a rotating basis	1
Better links with other markets	1
Close it down	1
Ensure the traders' committee operates in the best interests of all stakeholders	1
Market to include unusual products along with the normal everyday market	1
Request for food stall holders to sell in kilograms	1
More plant-based food items	1

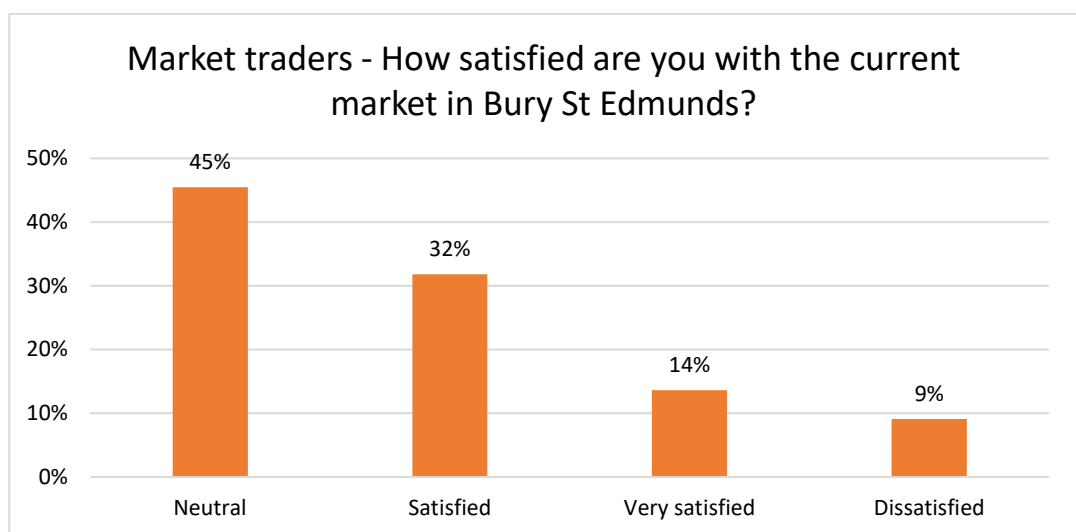
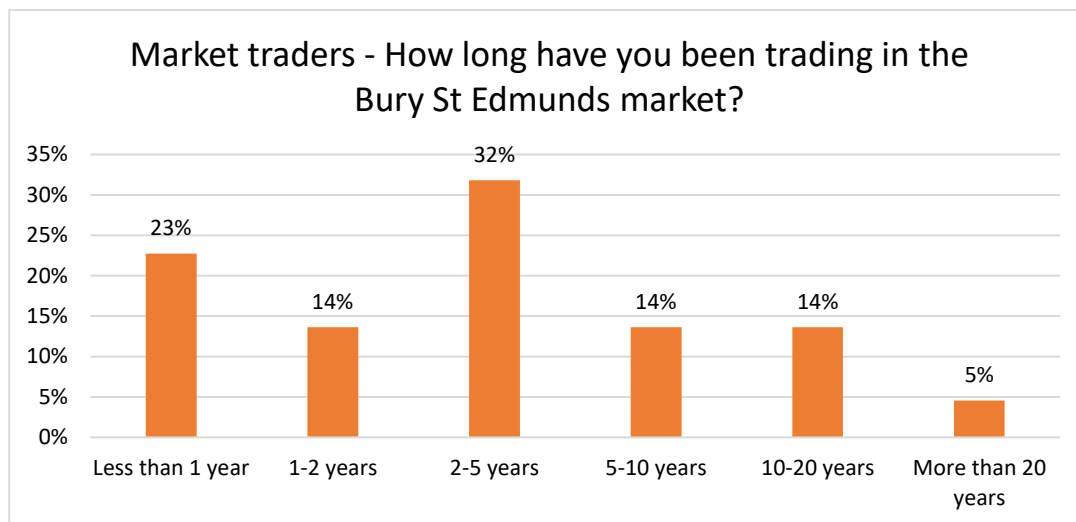
Suggestions for improvements	Frequency
Combine the Saturday and Wednesday markets with makers' and farmers' markets	1
More speciality retailers	1
Directory of stall holders	2
Reduce plastic consumption	1

73. 47 residents provided free text responses when asked to tell us how they see the market developing in the future as below.

How do you see the market developing?	Frequency
More traders and variety of stalls	12
Encouraging more small businesses and young traders	2
Struggling - pitches are expensive, car parking fees, not an innovative market and struggling to compete against online shopping	7
Keep the prices of the goods reasonable and affordable	4
Continue to provide quality stalls	3
More specialist markets such as local craft products and food trucks, than traditional	5
Investment for market to be accessible for all	1
To support our local traders and farmers more strongly, to reduce supermarket use and increase sustainability	3
Fewer traditional stalls, with a further move to crafts and food.	1
Make it child friendly and vibrant such as by renovating the old area of the market and adding colour	2
Create an indoor market which has a food hall at its centre	1
Invest in the market experience to spend some time rather than a quick look round	1
Reduce food-based vans	1
Combine craft and farmers market	2
Increase free seating areas	1
More culturally diverse stalls	1
More events	1
Encouragement of casual traders and smaller pop-up units on market days	1
Wider pedestrianisation of the Butter-market	1
Continued investment to support access for stall holders and good provision of services to them with reasonable costs to maintain the market and increase its offering	1

Market traders

74. Out of 101 respondents, 22 responded as market traders in Bury St Edmunds. Duration of trading in the Bury St Edmunds market and satisfaction levels as below.



75. Out of the 22 market traders, 21 provided commentary on what they liked about the market as below.

Positives	Frequency
Diverse variety of stalls	5
Saturday's market engages a good variety of customers, large footfall both tourists and regulars.	5
Well organised and set	4
Vibrant community atmosphere	6
Friendly relationship, loyal and regular customers	5

Positives	Frequency
Live music	1
Friendly, cheerful comradery support among other traders and organisers	8
Good quality of stalls	1
Superb team from West Suffolk Council on hand to help (Makers Market)	1
Social media advertising is good and promotes the market well	1
Good location	2
Street level allows access for everyone	
Rubbish regularly collected	1

76. Out of the 22 market traders, 21 provided commentary on what they disliked about the market as below.

Negatives	Frequency
Lack of organisation and poorly run	2
High rent/pitch charge for Wednesday's market	2
Not letting traders go in windy conditions – should not be penalised if they choose not to trade in adverse weather where safety is a concern as well as protecting valuable stock.	4
Lack of stalls on a Wednesday in the main market area.	2
The 10 nonattendances and consequent 2-week ban.	3
Access on and off the market is not very convenient, not many traders to fill the market. Expensive to trade there.	1
Antisocial behaviour from the public	1
Unkind traders – discrimination	2
Lack of loos for market workers	1
Hostility from council towards market traders	1
Lack of free parking provision for traders	3
Cannot keep vehicle on, unless in windy weather	1
Traders selling items that are mass produced and bought in. Affects hand makers trade as they are unable to compete on price.	1
Decline in footfall and no new customers	1
Rules around gazebos are outdated, with high winds it may be unsafe to have a gazebo up even when it's well weighted	1

77. Out of the 22 market traders, 19 provided suggestions for improvement as below.

Suggestions for improvement	Frequency
Try to improve attendance by offering an incentive for good attendance	1
Free parking for traders	2
Fix the kerb dips	1
Vehicles left on (only cars). Traders with smaller vehicles be able to leave it next to their stall and this will free up more parking in the carpark. vans being on site makes the market much safer during windy conditions.	2
More promotion for markets	1
West Suffolk Council to replace gazebos, perhaps all have white or light-coloured tops/rooves as the current blue ones make the sales space very dark, whereas the lighter ones show off the goods for sale much better.	1
Hold a Vintage Market a few times per year	1
Shorter trading day	2
Cheaper pitches	2
Loos for the market workers	1
Increase the number of stalls trading	3
All traders to be treated equally	2
Try and move traders closer together so it looks more compact, particularly in poor weather	1
Incentive to trade on Wednesday's, not just Saturday.	1
More support for traders	1
Regular events with musicians, seating areas outside, in the summer, more coffee stalls etc, an outside play area for children, sand pit/soft play area, so parents can relax	2
A council officer who can make decisions on all matters but weather-related ones without recourse to phone calls, permissions etc, should be on site on market days 6AM to 4PM	2
Break up the food section and have trader spread throughout the market that are food or have more than one area for food traders	1

78. Out of the 22 market traders, 16 provided commentary on how they see the market developing in the future as below.

How do you see the market developing?	Frequency
More diversity in stall types	2
Include buskers/bands	1
Create an undercover market to combat climate change and harsh weather conditions	1

How do you see the market developing?	Frequency
Make pitch rent cheaper for regular traders, particularly on Wednesday.	3
Implement a parking deal on Wednesday's so after 12PM is free.	1
More advertising to promote it	1
Ability to extend and fill more of the town	1

Further questions for market traders in Bury St Edmunds

79. Out of the 22 market traders, 21 provided commentary on the positive aspects of being a market trader in Bury St Edmunds as below.

Positive aspects of being a market trader	Frequency
Self-employment, independence, flexibility and a regular income	11
Interaction with friendly customers and a feeling of community	12
Camaraderie with fellow traders	6
Being part of a vibrant town centre.	1
Being able to move around and go where the customers are, without retail overheads	2

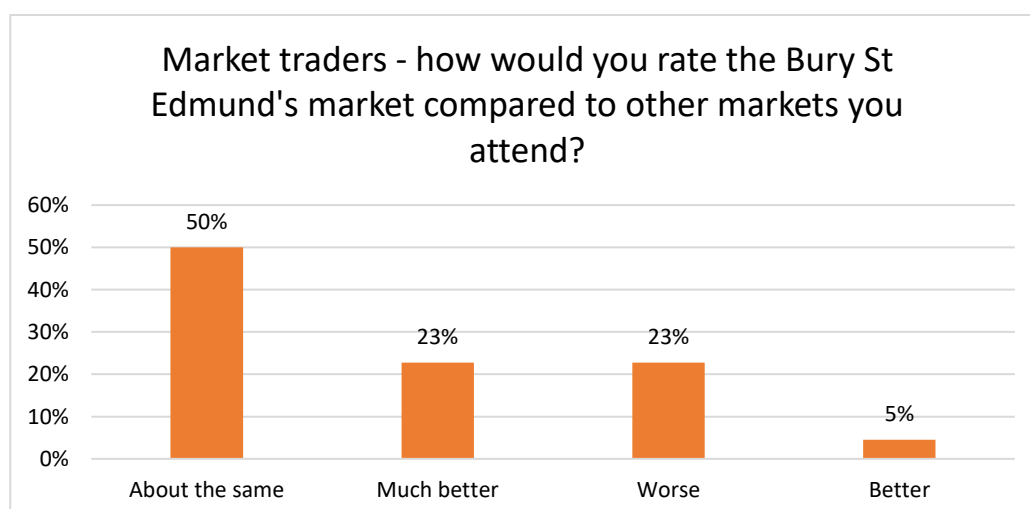
80. Out of the 22 market traders, 20 provided commentary on the challenges of being a market trader in Bury St Edmunds as below.

Challenges of being a market trader	Frequency
Dips in tarmac damaging tables, due to uneven surface	1
The weather such as high winds, rain	13
No loos	1
Rules and regulations of Suffolk County Council.	1
Gaining new customers and building trust	2
Having to remove the van makes it too difficult to trade regularly. No cover for solo traders, to park the van, go to the loo, replenish stock, pick up van at end of day	2
Internet shopping. Town centres with empty shops may not attract people. People's shopping habits have changed over time	
Declining footfall - loss of revenue, because of the cost-of-living crisis	3
Rude unkind behaviour from other traders	1
High rents	1

81. Out of the 22 market traders, 19 provided suggestions for improvements for the market to better support traders as below.

Improvements for the market	Frequency
To review the policy on days missed to coincide with the impact of global warming on the weather	2
Continue to have a markets officer present	2
Engagement with the traders, better communication such as providing notes or correspondence on the outcomes of relevant meetings or discussions	1
More exposure to Makers Market	1
Opening the public toilets in the ARC earlier on a Sunday	1
Council to have more of a 'can do' attitude	2
There could be some kind of financial incentive for traders that turn up week in week out despite the weather, especially in Jan-Feb when takings are traditionally down	1
Free parking on market days	2
Implement more events & activities for families, children etc	1
Reduce pitch fees	2
Smarten up the market site, trees, pavements, litter etc, more flowers planters etc	1
Increased police presence	1
Increase publicity for Bury St. Edmunds, more Social Media coverage, Facebook, Instagram, Marketplace etc to share it around everywhere and advertise different stalls	1
Ensure traders have correct weights on gazebo stalls	1
Allow casual traders to turn up on the day with no need to book in advance.	1

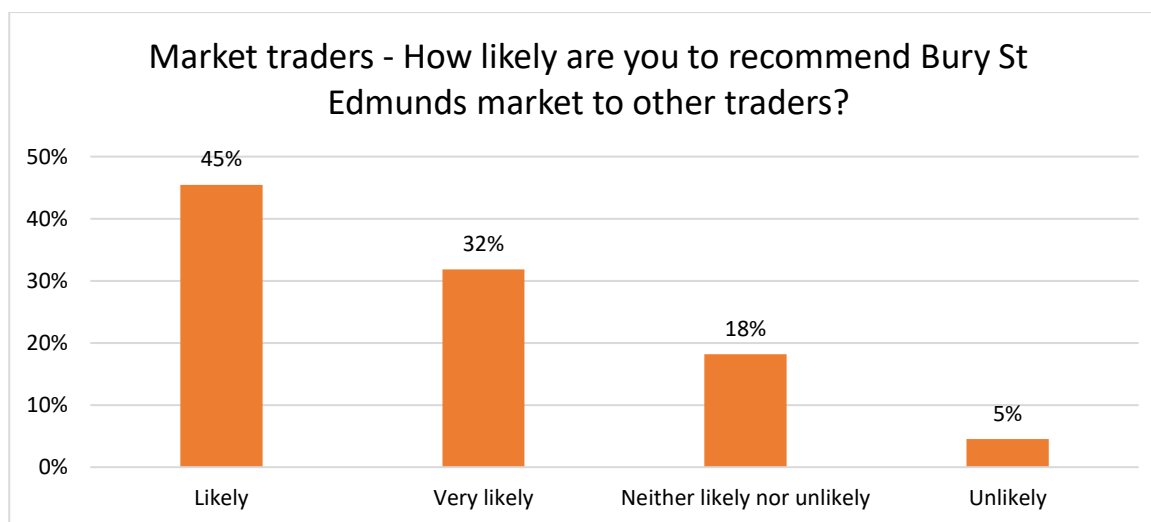
82. All market traders gave a rating on how they compare the Bury St Edmunds market in comparison to other markets they attend as below.



83. Several market traders explained their suggestion with some providing examples as below.

Explain selection with an example(s) of markets that are of good practice
Run very well. And the market inspectors at Bury St Edmunds market are fair
Ipswich market is well run with most traders doing all four trading days.
Sudbury - the councillors in charge of the market come to all new traders and introduce themselves.
Bury seems to have no leeway in hard times
In other markets, bins are provided to put rubbish in, and the organiser is always available during the market not just at the beginning and end of the market
Sudbury, Ely, Haverhill
Other markets provide time off for illness and traders are not penalised for bad weather
Traders are unable to leave vans on to keep extra stock on and helps when the weather is unpredictable and the market finishes at 3PM
Antiques markets, vintage markets run by Black Dog and Deben events

84. All market traders gave a rating on how they compare the Bury St Edmunds market in comparison to other markets they attend as below.



85. Several traders explained their selection as below.

Commentary	Frequency
Footfall is high	2
The market is busy, the set up/pack down is simple, the town feels safe and the application process/communication easy	1
Well run, efficient, and helpful support staff	2

Commentary	Frequency
Bury St Edmunds has good transport links, attractions, retail offer	2
Having to remove the van makes it too difficult to trade regularly.	1
Some traders make new traders feel unwelcome	1
Traders are nice	1
Pitch prices put traders off and lack of admin organisation to become a permanent trader	1

Town, parish, district, or county councillor

86. Out of 101 respondents, two identified as West Suffolk town, parish, district, or county councillors, representing two wards, with one in Bury St Edmunds. Two councillors were represented in this consultation, both commenting on the Bury St Edmunds market.
87. When asked how often they visit the market, one mentioned 'about once a week' and another 'a few times a month'.
88. When asked how satisfied they are with the current market, one mentioned 'neutral' and another 'very dissatisfied'.
89. When asked what they liked about the market, one councillor wrote that the Saturday market is reasonably well attended by market traders with lots of stalls. Another councillor mentioned that a several stalls were forced out of the market as they were unable to park their vehicles.
90. When asked what they disliked about the market, one councillor mentioned that there are too many street food trucks, and another highlighted the reduced footfall on a Wednesday. They further added that there are a few stalls worth attending on a Wednesday with a lack of variety.
91. When asked to provide suggestions for improvement, one councillor mentioned to encourage traders to return that have left. Another councillor raised the importance of more stalls to provide a better offer, noting that if it results in lower pitch fees to encourage more traders, it may be a good investment. They further added more seating areas and loo provisions.
92. When asked to provide suggestions for development, one councillor mentioned to increase stall holders as car parking numbers are increasing. They raised the importance of market days taking top priority over other markets on different days, like the Sunday markets.

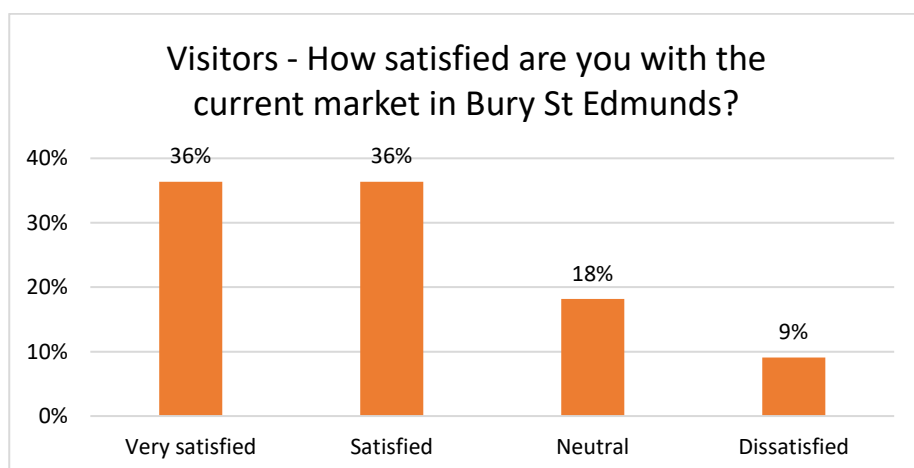
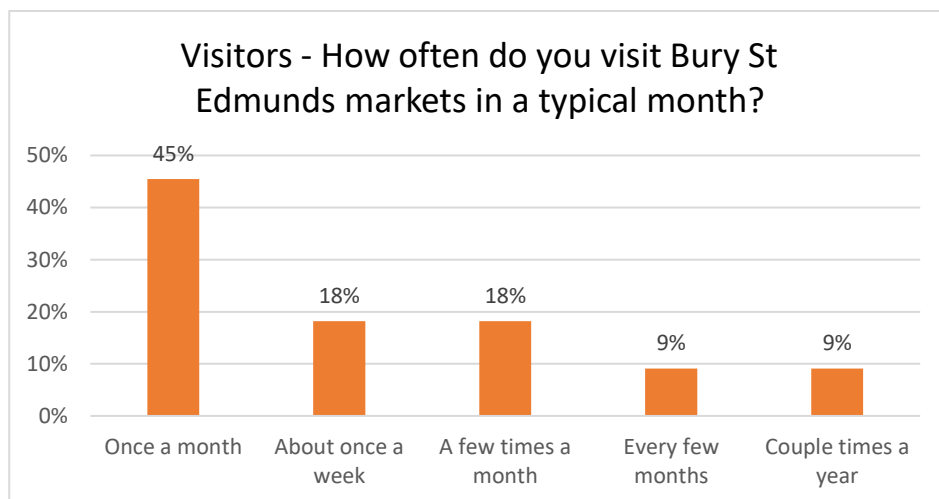
Community group

93. Out of 101 respondents, one identified as a community group, Suffolk Bitcoin
94. When asked how often they visit the market, they mentioned 'once a week'.

- 95. When asked how satisfied they are with the current market, they mentioned 'very satisfied'.
- 96. When asked what they liked about the market, they mentioned the market has a good variety of stalls.
- 97. When asked what they disliked about the market, they wrote 'nothing'.
- 98. When asked to provide suggestions for improvement, they raised the importance of education on the benefits of accepting bitcoin as payment.
- 99. When asked to provide suggestions for development, they raised for the market traders to accept bitcoin as payment.

Visitors to West Suffolk markets

- 100. Out of a total 101 respondents, 11 were visitors providing a mix of multiple choice and free text responses to the below:



- 101. 8 visitors provided free text responses as to what they like at Bury St Edmunds market as below.

Positives	Frequency
Good variety of stalls	5
Affordable	1
Regular stalls	1
Friendly traders	1
Good food stalls	1

102. 6 visitors provided free text responses as to what they dislike at Bury St Edmunds market as below.

Negatives	Frequency
Lack of variety	1
Not many antique market stalls	
Same stalls each week	1
Roads tricky to navigate	1
Parking is expensive	2
Lack of seating	1

103. Six visitors provided suggestions for improvements for the market as below.

Suggestions for improvement	Frequency
Increase variety of stalls	2
More local businesses	1
Take more bitcoin	1
Better signage	1
Dog bowls	1
Better seating arrangements	1

104. Seven visitors provided suggestions for development for the market as below.

Suggestions for development	Frequency
More variety such as clothing stalls and antiques	3
Market is poor and will disappear	2
Take more bitcoin	1
Keep the market traditional selling local produce and goods	1

Other

105. Out of 101 respondents, one identified as 'other' being West Suffolk Council staff.

106. When asked how often they visit the market, they mentioned a few times a month.

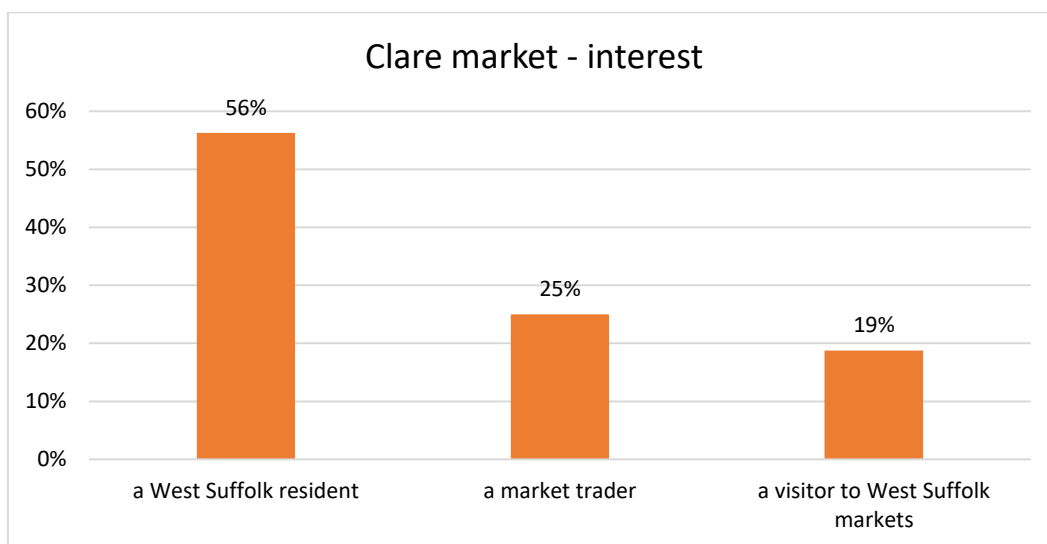
107. When asked how satisfied they are with the current market, they mentioned 'neutral'.

108. They provided no further free text responses.

Section 5: Clare market

Overall

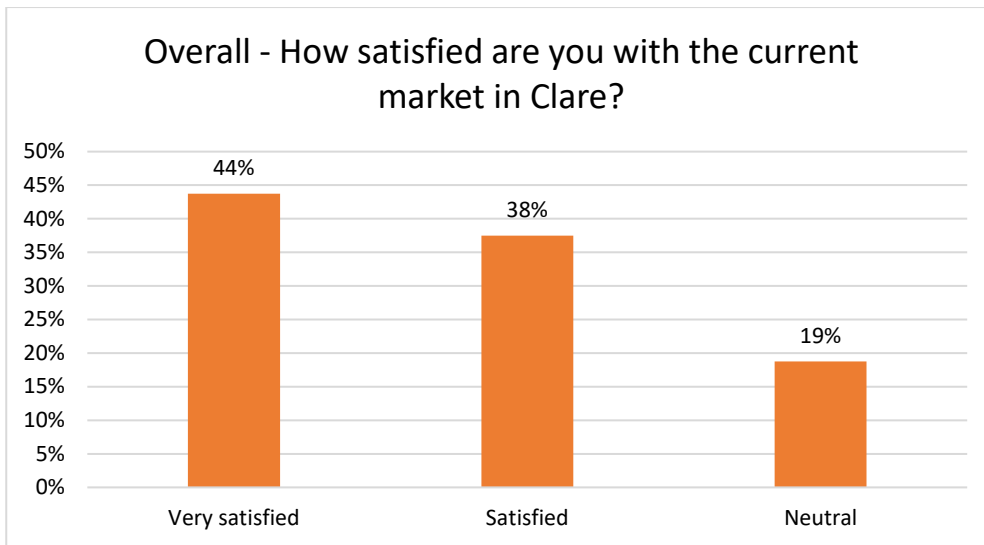
109. A total of 16 respondents commented on the Clare market in West Suffolk. Of these, 9 were residents (56 per cent), 4 were market traders (25 per cent) and three as visitors to West Suffolk markets (19 per cent).



110. Respondents were asked a series of multiple-choice questions such as frequency of their visits to the market in a typical month (except for market traders) and their satisfaction ratings.

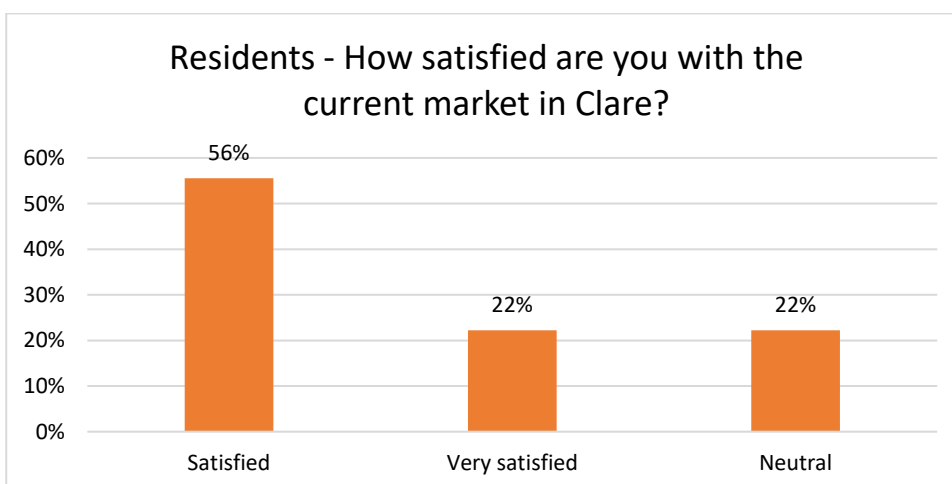
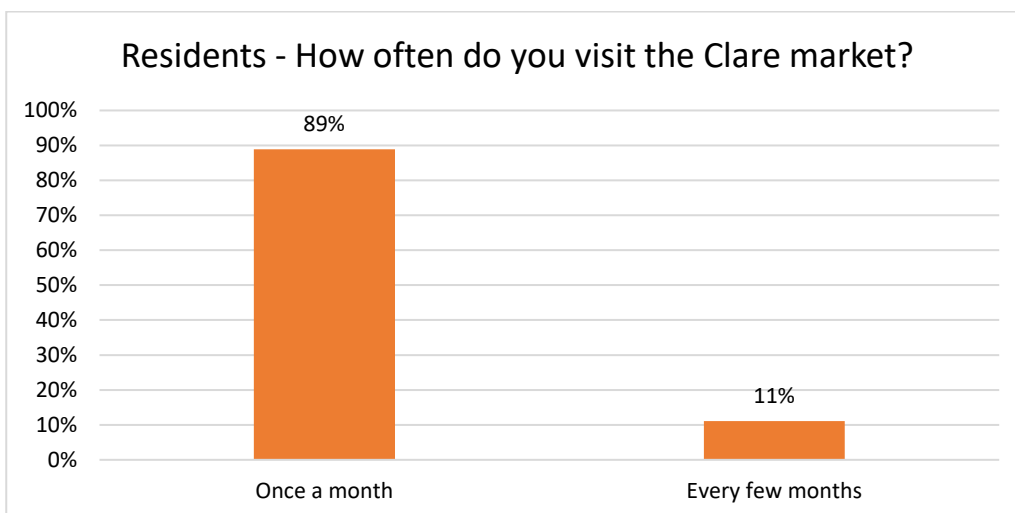
111. They were then asked what they liked, disliked, improvements for the market and how they see it developing in the future. The latter four responses were free text.

112. All respondents provided an answer to the multiple-choice question as below.



West Suffolk residents

113. Out of 16 respondents, 9 identified as West Suffolk residents, providing a mix of multiple choice and free text responses to the below:



114. 8 residents provided free text responses as to what they like at Clare market as below.

Positives	Frequency
Parking availability and free parking on streets	2
Variety of goods	1
Quality of stalls	2
Good sense of community	1
Location – local cafes close to market	1

115. 8 residents provided free text responses when asked to tell us what they disliked as below.

Negatives	Frequency
Small number of stalls, lack of choice	4
Poor parking availability	2
Nothing	1

116. 6 residents provided free text responses when asked to provide suggestions for improvements as below.

Suggestions for improvement	Frequency
More parking and relaxed street parking on market days	2
More stalls and larger variety	2
Invite more small businesses such as more farm products, veg, fruits	1
More advertising in surrounding towns	1

117. 6 residents provided free text responses when asked to tell us how they see the market developing in the future as below.

Suggestions for development	Frequency
Increase in size	2
More stalls	2
Market running twice a month	1
Move towards more crafts and food	1

Market traders

118. Out of 16 respondents, 4 responded as market traders in Clare. Duration of trading in the Clare market and satisfaction levels as below.



119. All four market traders provided commentary on what they liked about the market as below.

Positives	Frequency
Well organised	1
Good selection of traders	1
Good advertising	1
Friendly atmosphere	2
Free parking	1
Council staff officer friendly and helpful	1
Pitch fees are affordable	1
Market attracts a good number of customers	1

120. Three market traders provided commentary on what they disliked about the market as below.

Negatives	Frequency
Surface – loose bricks and public vulnerable to trips	1
Start time too early as local shops do not open until 9AM or 10AM when customers are out	1
Traders selling items that are mass produced and bought in. Affects hand makers trade as they are unable to compete on price.	1

121. Two market traders provided suggestions for improvement as below.

Suggestions for improvement	Frequency
Nothing	1
More advertising	1
More focus on local handmade traders at Makers Market	1

122. One market trader provided commentary on how they see the market developing in the future, mentioning for it to continue as is.

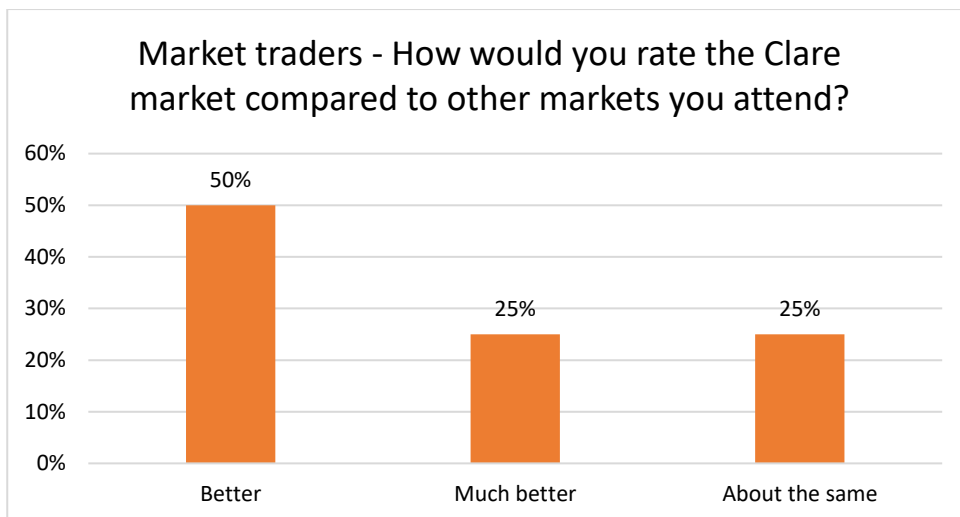
Further questions for market traders in Clare

123. All four traders provided commentary on the positive aspects of being a market trader in Clare. All mentioned the good community feeling with customers, being a regular face and selling to locals their products.

124. All four traders provided commentary on the challenges of being a market trader in Clare. Three traders mentioned the weather and one mentioned the bullying culture towards new traders with parking and set up difficult as a solo trader.

125. Three traders provided suggestions for improvements for the market to better support traders. Two mentioned nothing, and another raised how the Makers Market needs more exposure, with many people getting it confused with the weekly markets. A trader raised that the Makers Market can have its products devalued by larger traders selling bulk online products, mainly towards the Christmas season.

126. All market traders gave a rating on how they compare the Clare market in comparison to other markets they attend as below.



127. All market traders gave a rating on how they compare the Clare market in comparison to other markets they attend as below.



Visitors to West Suffolk markets

128. Out of 16 respondents, three identified as visitors to the market.

129. When asked how often they visit the market, one mentioned once a month and two other visitors mentioned 'every few months'.

130. When asked how satisfied they are with the current market, two visitors mentioned 'very satisfied' and another 'neutral'.

131. When asked what they liked about the market, two visitors mentioned that it is local, small, and friendly.

132. When asked what they dislike, one visitor raised that parking is hard when the market is on, and another noted that there are not enough bargains.

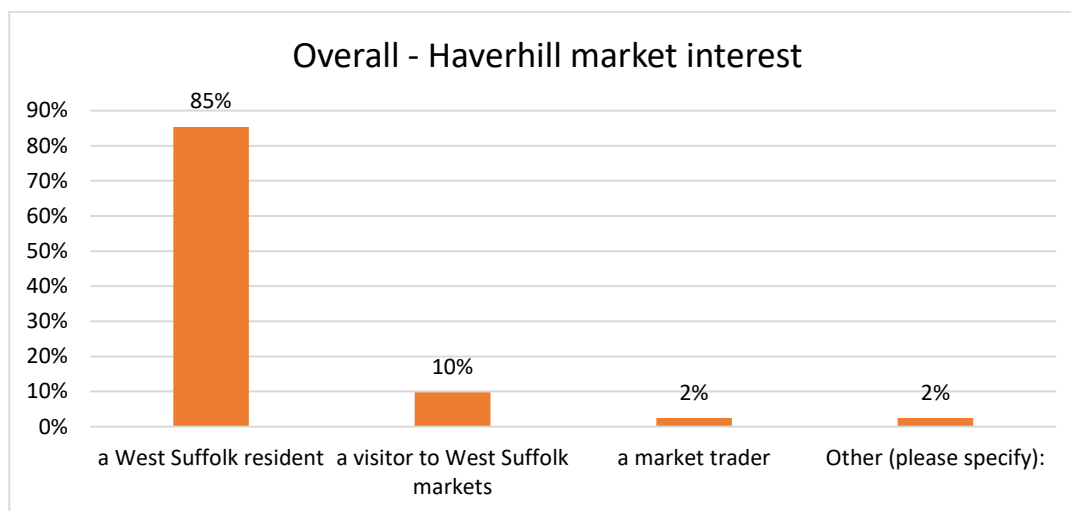
133. When asked for suggestions to improve the market, one requested more variety and another, more local produce at an affordable price.

134. When asked how they see the market developing in the future, one respondent wrote to 'look at a different area within Clare'.

Section 6: Haverhill market

Overall

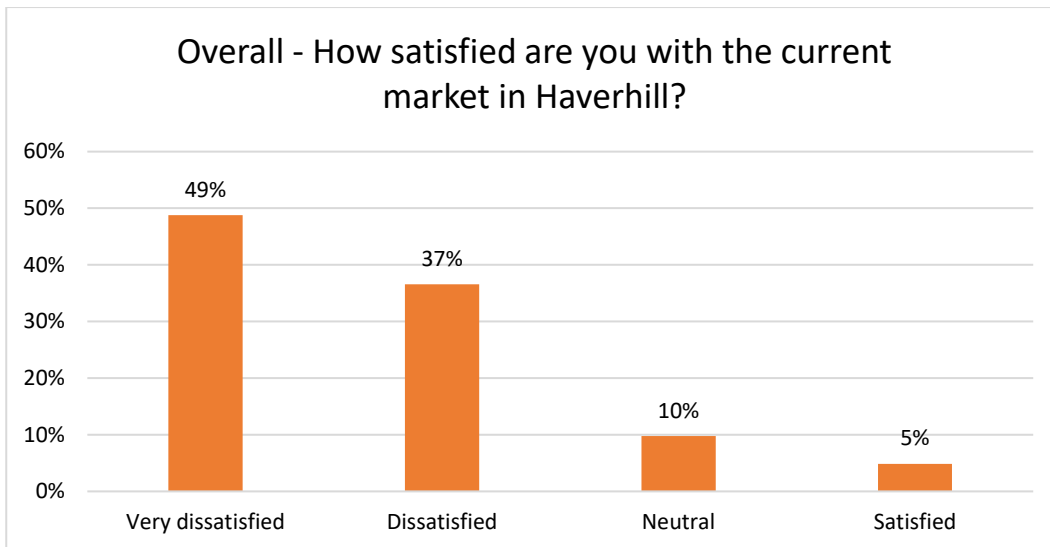
135. A total of 41 respondents commented on the Haverhill market in West Suffolk. Of these, 35 were residents (85 per cent), one was a market trader (2 per cent), four as visitors to West Suffolk markets (10 per cent) and one as 'other', identifying as a potential trader (2 per cent).



136. Respondents were asked a series of multiple-choice questions such as frequency of their visits to the market in a typical month (except for market traders) and their satisfaction ratings.

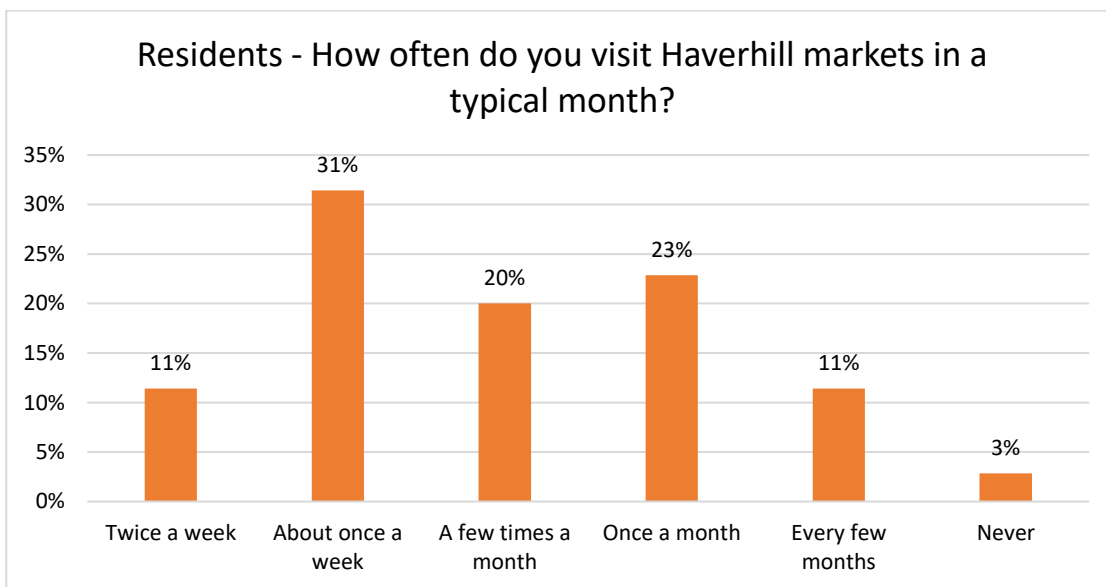
137. They were then asked what they liked, disliked, improvements for the market and how they see it developing in the future. The latter four responses were free text.

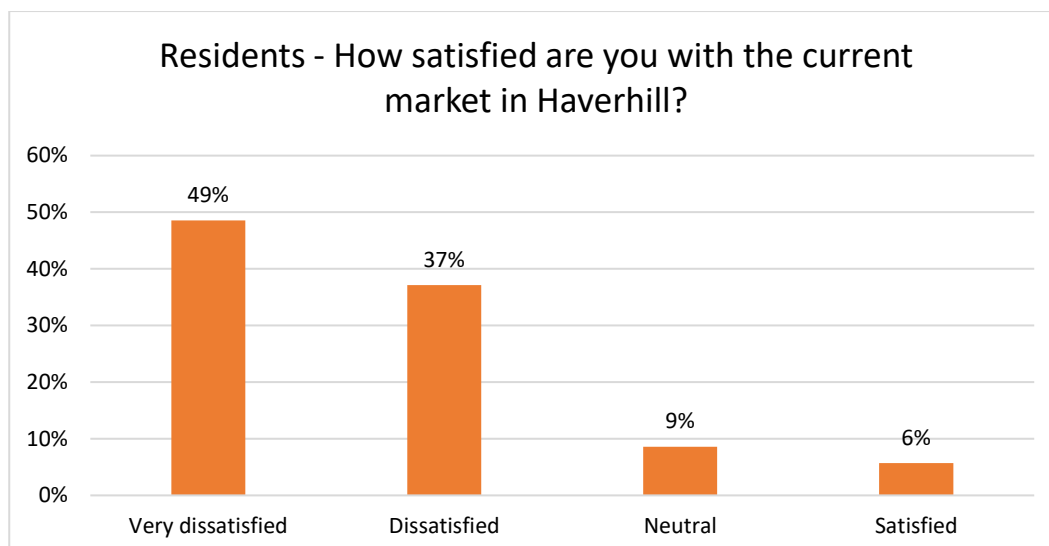
138. All respondents provided an answer to the multiple-choice question as below.



West Suffolk residents

139. Out of 41 respondents, 35 identified as West Suffolk residents, providing a mix of multiple choice and free text responses to the below:





140. 29 residents provided free text responses as to what they like at Haverhill market as below.

Positives	Frequency
Variety of stalls	5
Makers Market	6
Ease of access	1
Quality fresh produce	4
Friendly regular traders and good atmosphere and community with customers	9
Craft fair	1
Easy to get to	1
Plenty of parking	1
Town is pedestrianised	1
Supporting local businesses	3
Plenty coffee shops	1
Nothing to like	7

141. 33 residents provided free text responses as to what they disliked as below.

Negatives	Frequency
Not enough stalls	23
Parking costs	1
No atmosphere	2
No variety	6
Poor quality of products and fruit and veg, rarely fresh	2

Negatives	Frequency
Too small	5
Council making it unrealistic for anyone to afford to let shops to bring in visitors who would shop at the market	1
Stalls too spread out – a lot of blank space	2
No support for existing traders with focus only on Makers Market	1
Makers Market selling overpriced goods	1
Closes early	1
No footfall to the town due to a lack of town funding	1
Rude traders	1

142. 31 residents provided free text responses when asked to provide suggestions for improvements as below.

Suggestions for improvement	Frequency
Market better held on Saturday on Market Square	1
Include events and encourage street performances	2
Open one of the empty shops or use the town hall for indoor markets	1
More support/incentives for new and existing traders	7
Free or reduced parking on market days	4
More stalls	12
Greater variety of stalls	4
Provide indoor spaces	1
Timings – variety weekly instead of monthly for Makers Market	1
More seating areas	1
Have the market fortnightly or monthly when the Makers Market is on	1
More local produce vendors	1
Increased advertising of the market	1
Reduce pitch fees	3
Increase town appeal in Haverhill for retail by improving the high street	4
Ensure stalls are reasonable priced selling everyday items	1
Make pitches free	1
Increase signage	1
Convert market into a monthly craft market and redevelop Market Square	1

143. 31 residents provided free text responses when asked to provide suggestions for development as below.

Suggestions for development	Frequency
Decrease trader costs	1
Market will cease to exist with current provisions	14
More advertising	2
Encourage more traders	3
More stalls such as food and drink to increase variety	5
Invest in the market	2
Invest in the high street to increase footfall	3
Market to operate for longer during the day, shut later	1
Ease parking restrictions	1
Ensure car parking are a distance to walk for the elderly	1
Remove barriers to traders, such as limits on the amount of the same type such as bakers	1
Encourage pop up with limited concession for a limited period	1
Include entertainment such as street performers and kids toy stalls	2
Take inspiration from the Saffron Walden model, talk to the Uttlesford authority	1

Market traders

144. Out of 41 respondents, one responded as market trader in Haverhill.

145. The trader has traded for 1 – 2 years in the Haverhill market.

146. When asked how satisfied the trader is with the market, they chose 'neutral'.

147. When asked what they like about the market, they mentioned that 'it is on the high street'.

148. When asked what they dislike, they mentioned that the town can have poor footfall and the town is 'negative'.

149. They provided no free text responses for suggestions of improvement and development for the market.

Further questions for market traders in Haverhill

150. When asked on the positive aspects of being a market trader in Haverhill, the trader mentioned the good feeling of community.

151. When asked about challenges they face, they mentioned the weather.

152. When asked about suggestions for improvements, they mentioned that the Makers Market requires more exposure as customers often get confused between the weekly markets and Makers Market. They added that the Makers Market sometimes has products devalued by larger traders selling bulk online products, mainly during the Christmas period.
153. When asked how they would rate the Haverhill market compared to others they attend, the mentioned 'about the same'.
154. When asked how likely they are to recommend the market to other traders, they mentioned 'likely'.

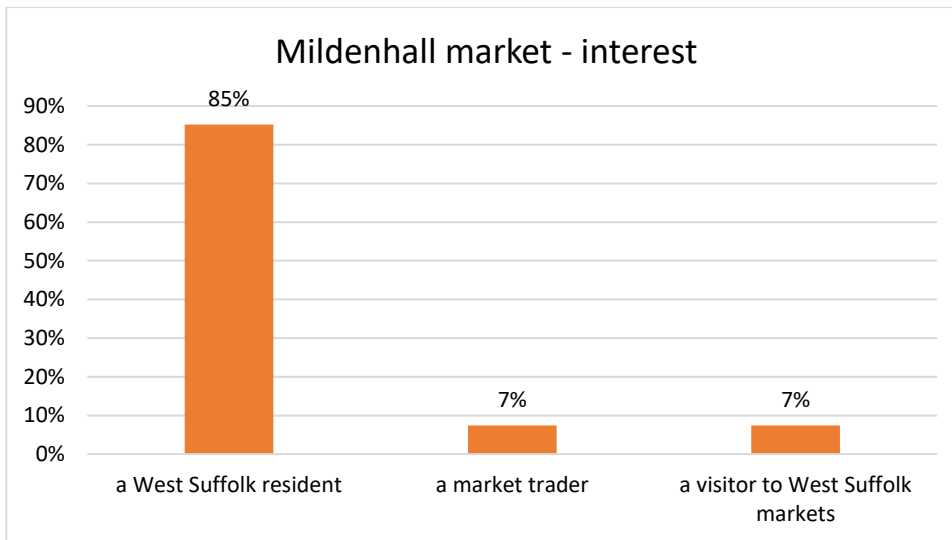
Visitors to West Suffolk markets

155. Out of 41 respondents, four identified as visitors to the market.
156. When asked how often they visit the market, three mentioned 'about once a week' and one visitor indicated 'a few times a month'.
157. When asked how satisfied they are with the current market, two visitors mentioned 'dissatisfied' and two others, 'very dissatisfied'.
158. When asked what they liked about the market, one visitor mentioned it has a variety of goods. Another mentioned that the cakes and vegetable produce are excellent. Another raised that the market has lots of space and is not crowded, while noting it has a good variety, this is not always the case.
159. When asked what they dislike, all four visitors noted the lack of stalls. With one raising that there needs to be more variety with affordable items.
160. When asked what improvements, all visitors mentioned more stalls, particularly affordable ones. One visitor noted more seating areas and food options.
161. When asked how they see the market developing in the future, one respondent wrote to they do not, 'unless parking restrictions change on the high street and car parks are a distance to walk for the elderly'. Also noting the town needs more footfall for improvement.

Section 7: Mildenhall market

Overall

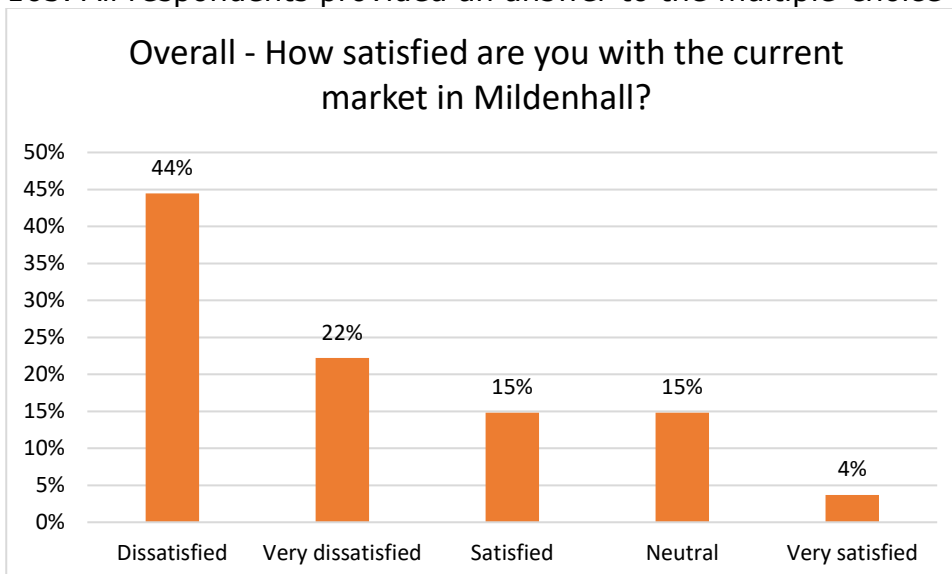
162. A total of 27 respondents commented on the Mildenhall market in West Suffolk. Of these, 23 were residents (85 per cent), two were market traders (7 per cent) and two identified as visitors to West Suffolk markets (7 per cent).



163. Respondents were asked a series of multiple-choice questions such as frequency of their visits to the market in a typical month (except for market traders) and their satisfaction ratings.

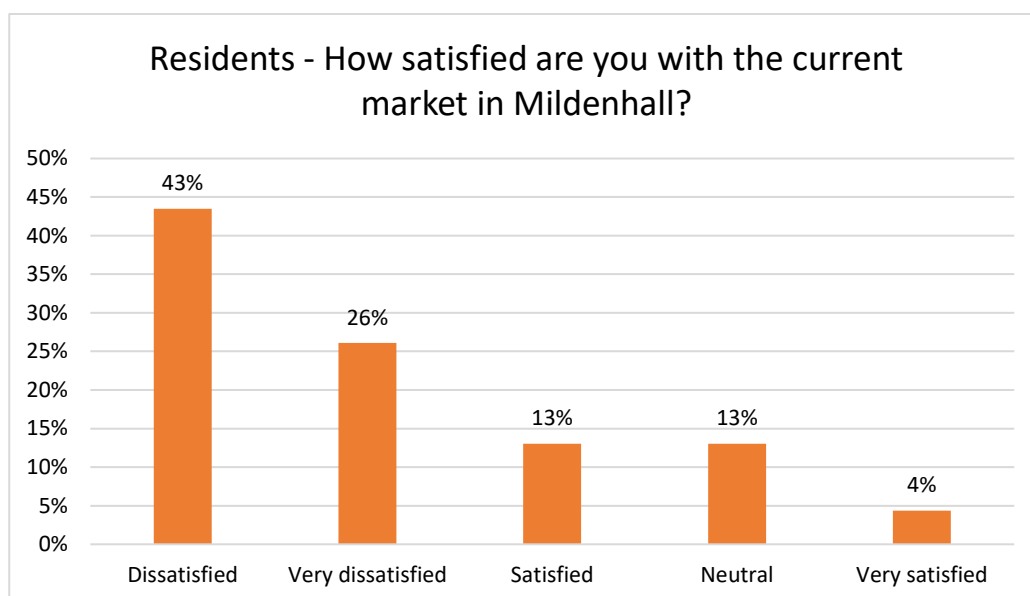
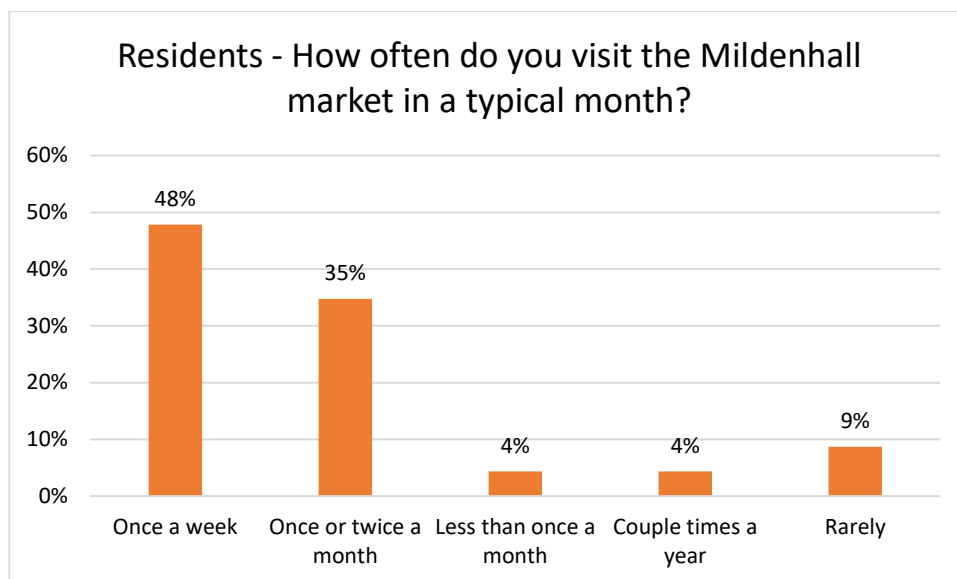
164. They were then asked what they liked, disliked, improvements for the market and how they see it developing in the future. The latter four responses were free text.

165. All respondents provided an answer to the multiple-choice question as below.



West Suffolk residents

166. Out of 27 respondents, 23 identified as West Suffolk residents, providing a mix of multiple choice and free text responses to the below:



167. 19 residents provided free text responses as to what they like at Mildenhall market as below.

Positives	Frequency
Location	3
Safety for walking around	1
Variety of stalls such as Thai food truck, fish van, bread and fruit and veg stalls	7
Nice friendly regular traders	3
Availability of fresh and alternative produce	1

168. 19 residents provided free text responses as to what they disliked as below.

Negatives	Frequency
Lack of variety and choice	5
Too small	1
Lack of parking	1
Poor quality of fruit and veg	1
Too many food stalls	5
Lack of stalls	9
Losing Meet and Greet	1
No encouragement for new vendors to have a stall	1
Too many restrictions on stall holders	1
Poorly advertised	1
Expensive	1
Operating hours do not cater for working people	1

169. 17 residents provided free text responses when asked to provide suggestions for improvements as below.

Suggestions for improvement	Frequency
Increase variety of stalls such as meat providers, fish, cheese, bakery, homewares etc... that are locally grown	7
Re locate it	1
Less coffee and cakes stalls	1
Keep pitch fees low	2
More stalls	6
Engage with traders and increase their incentives to trade	3
Keep market open for longer for working people	1
Remove street food vendors that duplicate businesses already in town.	1
Entertainment during school holidays for children	1

170. 15 residents provided free text responses when asked to provide suggestions for development as below.

Suggestions for development	Frequency
Increasing in size	2
Do not see development, market does not encourage vendors	9
More craft market style	1
Attract more stall holders	1

Lengthen operation times	1
Invest in retail, welcoming spaces and other amenities in town centre to improve footfall	1
Requires more advertising	1
More engagement and collaboration with existing local businesses to help promote the town	1
Mildenhall does not provide the depth and breadth for local shoppers. Mildenhall does not have the economic power that Newmarket and Bury-St-Eds has.	1

Market traders

- 171. Out of 27 respondents, two responded as market traders in Mildenhall.
- 172. When asked how long they have been trading, one mentioned 1-2 years and the other 5-10 years.
- 173. When asked how satisfied the traders are with the market, they both choose 'very dissatisfied'.
- 174. When asked what they like about the market, one trader mentioned that other traders are friendly and the other mentioned nothing.
- 175. When asked what they dislike about the market, one trader mentioned that it is badly organised with wasted space. They indicated the start time is ok, but the duration until 3PM is long for a small market, as by 1PM 'it is virtually empty'. The next trader has indicated they stopped trading at Mildenhall market as it was not sustainable. Items sold did not cover their pitch fee and there was little advertising for the market.
- 176. When asked about what improvements they suggest for the market, one trader requested for more organisation and stalls set out in a better format to not waste space. The other suggested an increase in advertising and promotion, reducing the pitch fee and working with the town council to promote the market. They also suggested to reduce the trading hours down to at least 1/2PM so customers arrive 'within a shorter time frame'.
- 177. When asked how they see the market developing in the future, one trader suggested more organisation and the other an increase in the variety of stalls, increased promotion, and incentives for casual traders to create a 'fuller market'.

Further questions for market traders in Mildenhall

- 178. When asked about the positive aspects of being a market trader in Mildenhall, one trader mentioned being able to move and go where the customers are. The other indicated the enjoyment of talking and selling to locals.

179. When asked about the challenges faced as a trader, both indicated the weather. One trader mentioned it is difficult to trade under a gazebo in high winds and rain. They added 'it is difficult to find somewhere to park the vehicle for the length of trading time and costs money on top of the pitch fee'. The other trader mentioned they do not attend due to bad weather, as it voids their insurance.
180. When asked what improvements they would suggest for the market to better support traders, one mentioned that 'on the whole [they are] supported'. The other trader suggested to have understanding 'supervisors' and requested no penalties if they are unable to make it to the market with a ban on top of a loss in income unproductive.
181. When asked how they would rate the market compared to others, one trader indicated 'better' and another 'about the same'.

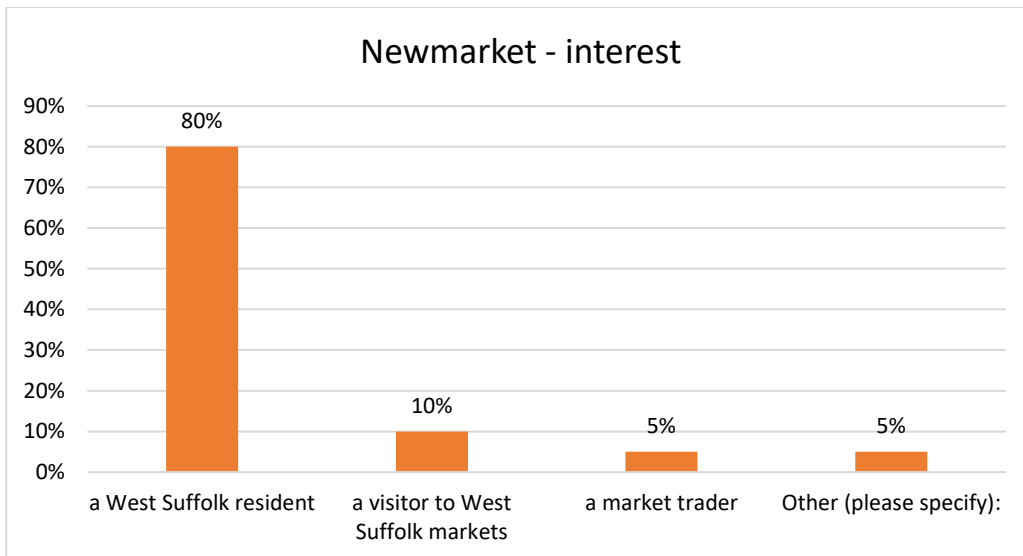
Visitors to West Suffolk markets

182. Out of 27 respondents, two identified as visitors to the market.
183. When asked how often they visit the market, one mentioned 'once or twice a month' and another 'less than once a month'.
184. When asked how satisfied they are with the current market, one indicated 'satisfied' and another 'neutral'.
185. No visitors provided free text when asked what they liked about the market.
186. When asked what they dislike, one visitor mentioned that it is too small.
187. When asked to suggest improvements, one visitor mentioned more relevant stalls and better-quality products.
188. No visitors provided free text when asked how they see the market developing in the future.

Section 8: Newmarket market

Overall

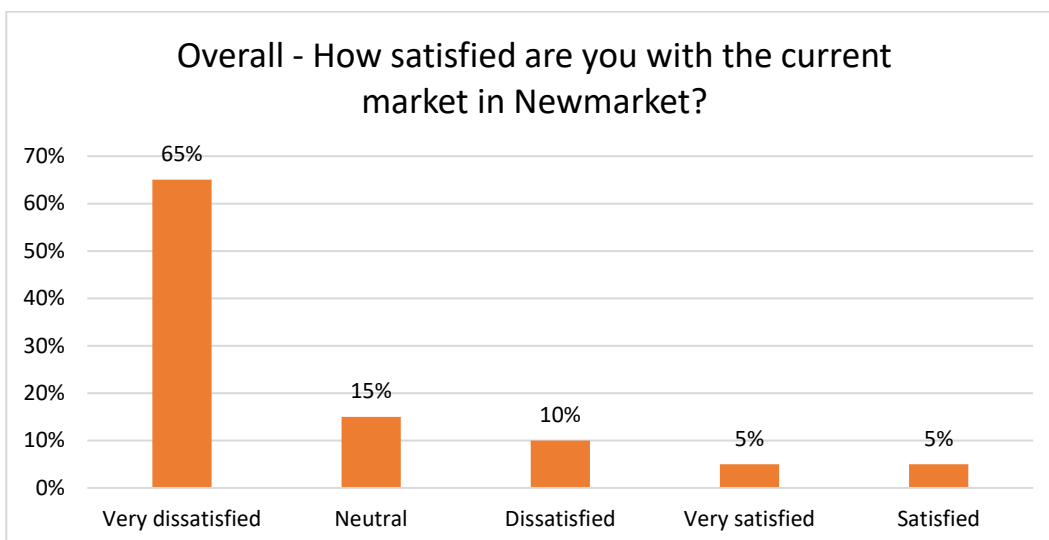
189. A total of 20 respondents commented on the Newmarket market in West Suffolk. Of these, 16 were residents (80 per cent), one was a market trader (5 per cent), two identified as visitors to West Suffolk markets (10 per cent) and one as 'other', a Cambridgeshire resident (5 per cent).



190. Respondents were asked a series of multiple-choice questions such as frequency of their visits to the market in a typical month (except for market traders) and their satisfaction ratings.

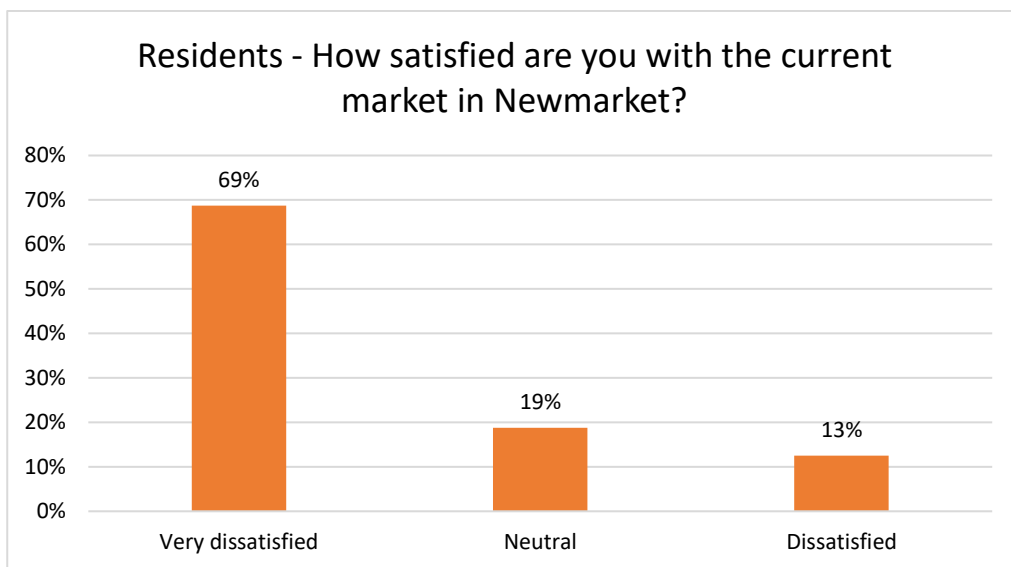
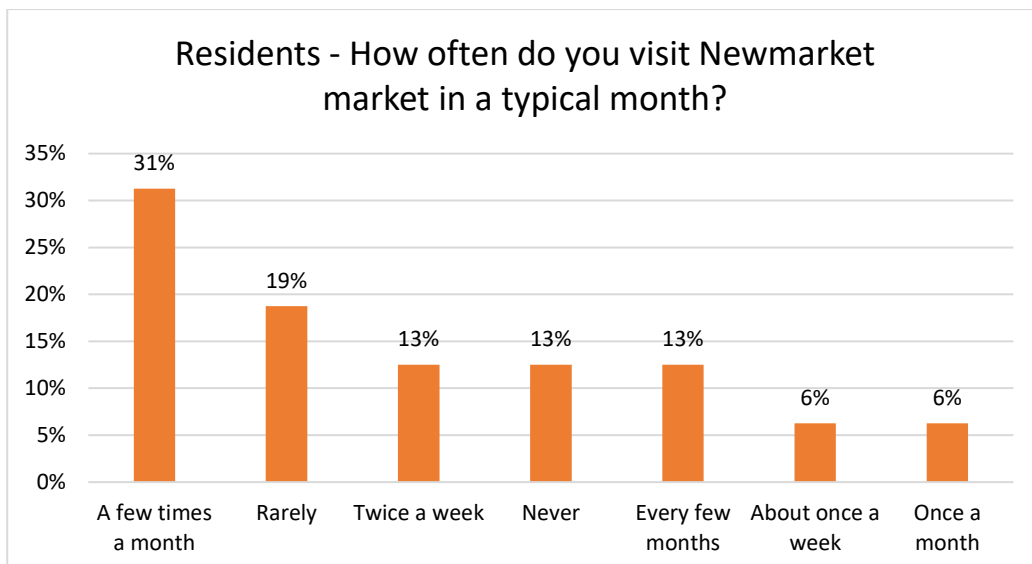
191. They were then asked what they liked, disliked, improvements for the market and how they see it developing in the future. The latter four responses were free text.

192. All respondents provided an answer to the multiple-choice question as below.



West Suffolk residents

193. Out of 20 respondents, 16 identified as West Suffolk residents, providing a mix of multiple choice and free text responses to the below:



194. 13 residents provided free text responses as to what they like at Newmarket market as below.

Positives	Frequency
Friendly traders	3
Nothing	5
Affordability of fruit and veg stalls – quality produce and a wide range	2
Convenient location	2
Less plastic used	1

195. 15 residents provided free text responses when asked to tell us what they disliked as below.

Negatives	Frequency
Lack of stalls	10
Inconvenient location	3
Reduce cost of parking	1
Not attractive	1
Lack of support from the council	1
Small	1
Lack of variety	1

196. 15 residents provided free text responses when asked to provide suggestions for improvement.

Suggestions for improvement	Frequency
Move market to Palace Street	1
Council and BID to encourage and support a diverse range of traders	2
More stalls	7
Encourage more stalls of local produce, farmer market style	2
Reduce costs for traders	1
Add a seating area	1
Add a mobile cafe	1
Increased advertising and signage	1
Move the market to the high street	3
Work with the town council to find the market a permanent home	1
Promotion of food stalls	1
Wider variety	1
Affordable parking	1
Make it more attractive and 'not part of a car park'	1
Better and bigger location	1

197. 14 residents provided free text responses when asked to provide suggestions for development.

Suggestions for development	Frequency
Nothing, if it stays as is, it will decline	6
Market needs more input from general public	1
Market to be in a more visible location such as the high street	3
Expansion	1
More stalls	1

Market traders

- 198. Out of 20 respondents, one responded as market trader in Newmarket.
- 199. The trader has traded for 1 – 2 years in the market.
- 200. When asked how satisfied the trader is with the market, they chose 'satisfied'.
- 201. They provided no free text response when asked what they liked about the market.
- 202. When asked what they dislike, they wrote that the market is not in the best location.
- 203. They provided no free text responses for suggestions of improvement nor development for the market.

Further questions for market traders in Newmarket

- 204. When asked about the positive aspects of being a market trader in Newmarket, they wrote that there is always a nice feeling of community.
- 205. When asked about the challenges of being a market trader, they wrote the weather.
- 206. When asked about improvements they suggest, they raised that the Makers Market requires more exposure.
- 207. When asked to rate the market compared to others attends, they opted for 'about the same'.
- 208. When asked how likely they are to recommend this market to other traders, they indicated 'likely'.

Visitors to West Suffolk markets

- 209. Out of 20 respondents, two identified as visitors to the market.
- 210. When asked how often they visit the market, one mentioned 'once a week' and another 'a few times a month'.
- 211. When asked how satisfied they are with the current market, one indicated 'very satisfied' and another 'very dissatisfied'.
- 212. When asked what they like about the market, one visitor mentioned fresh fruit and vegetables available.
- 213. When asked what they dislike, one visitor mentioned that there is normally only two fruit and vegetable stalls.

214. When asked to suggest improvements, one visitor mentioned more stalls, not just fruit and vegetable stalls.

215. When asked how they see the market developing in the future, one visitor mentioned moving the market back to the high street due to greater footfall and 'it would encourage more traders to the market'.

Other

216. Out of 20 respondents, one identified as other, describing themselves as a Cambridgeshire resident.

217. When asked how often they visit the market, they mentioned 'every few months'.

218. When asked how satisfied they are with the current market, they indicated 'very dissatisfied'.

219. When asked what they like about the market, they mentioned the Makers Market.

220. When asked what they dislike, they mentioned that the location is not visible to customers and is hidden away in a car park. They noted that there is a lack of variety in stalls and a lack of publicity regarding the Makers Market.

221. When asked to suggest improvements, they noted that the location should be changed. They added that the market should be visible.

222. When asked how they see the market developing in the future, they reiterated the location to change, more encouragement for stall holders to attend and better publicity.

Equalities impact

223. Respondents were asked an additional question around equalities impact. Out of the 181 respondents who provided an answer, 70 (39 per cent) stated that they 'don't know' if the new strategy has a disproportionate impact on any individual or group who has protected characteristics. 104 (57 per cent) answered that they did not think that it had a disproportionate impact. 7 (4 per cent) answered that they did think it had a disproportionate impact.

224. Of those that provided further details, multiple respondents noted that the markets must consider those with mobility issues, particularly older people with parking related issues. Another respondent similarly raised disability concerns. One respondent raised accessibility in terms of improving access to towns as a consideration. Another raised a sentiment of 'hostility' towards ethnic minorities from traders.

Conclusion

225. Throughout the engagement period, the responses received were extensive and comprehensive.

Section 2: Visiting the markets

226. Bury St Edmunds has the most frequent visitors in West Suffolk in comparison to other market towns, with 66 per cent of respondents having this as a frequently visited market, with Haverhill at 23 per cent and Mildenhall at 14 per cent.

227. The top three reasons for visiting markets in West Suffolk were 'to support local businesses and vendors' at 79 per cent, 'shopping for groceries' at 63 per cent and 'enjoying the outdoors' at 43 per cent.

228. The top three factors that would influence respondents' decision to visit the markets were 'availability of products and services' at 73 per cent, 'location and convenience' at 71 per cent and 'quality and freshness of products' at 66 per cent.

Section 3: Brandon market

229. Brandon market enjoys good satisfaction levels, with 50 per cent of all respondents 'satisfied' with the market.

230. Positives around the market were around the availability of quality produce, it's spacious location and reasonable variety.

231. Negatives raised include a lack of stalls as well as variety.

232. Suggestions for improvement include more stalls and longer opening hours. Suggestions for development include introducing traders of a diverse range.

Section 4: Bury St Edmunds market

233. Bury St Edmunds market also enjoys good satisfaction levels, with 41 per cent of respondents 'satisfied' and 32 per cent 'neutral'.

234. Positives surrounding the market include a good variety and choice of stalls, a friendly atmosphere with customers and traders and the good quality of produce, food stalls etc...

235. Many respondents raised the increase in food trucks/vendors as a negative to the market, a lack or a declining number of stalls throughout the years and a lack of variety and choice.

236. Suggestions of improvement include more traders to increase variety, free parking in the town on market days and more seating areas.

237. Suggestions for development include making pitch fees more affordable, introducing more specialist markets, and keeping the prices of goods reasonable. A few noted the rise in online shopping affecting business.

Section 5: Clare market

- 238. Clare enjoys good satisfaction levels with 82 per cent of respondents selecting 'very satisfied' or 'satisfied'.
- 239. Positives include free parking, good quality of stalls and a good sense of community.
- 240. Negatives raised include the small number of stalls and lack of choice.
- 241. Suggestions for improvement include more stalls with wider variety and to invite small businesses to trade.
- 242. Suggestions for development include increase in size and more stalls.

Section 6: Haverhill market

- 243. Haverhill has the second highest dissatisfaction levels in West Suffolk with 86 per cent of respondents selecting 'very dissatisfied' or 'dissatisfied'.
- 244. Positives include friendly regular traders, the Makers Market and the variety of stalls.
- 245. Negatives include a lack of stalls in the market, being too small and a lack of variety.
- 246. Suggestions for improvement include more stalls, free or reduced parking on market days and to increase town appeal in Haverhill by improving the high street.
- 247. When asked to provide suggestions for development, many indicated the market will cease to exist with current provisions, to encourage more stalls and to encourage and incentive traders in Haverhill.

Section 7: Mildenhall market

- 248. Mildenhall has the third highest dissatisfaction levels, with 66 per cent of respondent's selection 'very dissatisfied' or 'dissatisfied'.
- 249. Positives include the variety of stalls available, friendly traders and convenience of location.
- 250. Negatives include the lack of variety and choice, an influx of food stalls and more generally, a lack of stalls.
- 251. Suggestions for improvement include increasing the number of stalls, engaging with traders more and keeping pitch fees low.
- 252. When asked about suggestions for development, some mentioned an increase in size, but many indicated that they do not see development currently.

Section 8: Newmarket market

- 253. Newmarket had the highest dissatisfaction levels across all market towns, with 75 per cent of respondents selecting 'very dissatisfied' or 'dissatisfied'.
- 254. Positives include friendly traders, convenient location, but many noting 'nothing to like'.
- 255. Negatives include a lack of stalls, inconvenient location, and lack of variety.
- 256. Suggestions for improvement raised were to move the market to the high street, encourage more stalls of local produce and the council/BID to encourage a diverse range of traders.
- 257. Suggestions for development include market to be in the high street, more input from the general public, but most noting that nothing, if it continues.

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Acquisition of property for use as temporary accommodation

Report number:	CAB/WS/24/036	
Report to and date:	Cabinet	23 July 2024
Cabinet members:	<p>Councillor Diane Hind Portfolio Holder for Resources Email: diane.hind@westsuffolk.gov.uk</p> <p>Councillor Richard O’Driscoll Portfolio Holder for Housing Email: Richard.o’driscoll@westsuffolk.gov.uk</p>	
Lead officers:	<p>Rachael Mann Chief Operating Officer Tel: 01638 719245 Email: democratic.services@westsuffolk.gov.uk</p> <p>Jill Korwin Strategic Director Tel: 01284 757252 Email: democratic.services@westsuffolk.gov.uk</p>	

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:

- 1. the freehold interest of up to five units of temporary accommodation be purchased, the cost to be funded through:
 - a. the Local Authority Housing Fund Three; and**
 - b. government grant, discount or relief schemes, any other options for external funding, with the balance from and/or the Investing in Growth Fund as set out in Section 2.6 of this report;****
- 2. a capital budget of up to £887,750 (eight hundred and eighty seven thousand seven hundred and fifty pounds) be established for this purpose, to be funded as per the funding streams set out in (1) above, and be made available to facilitate the purchase of up to five units of temporary accommodation including fees, survey and valuation costs;**
- 3. it be noted that, in line with recommendations (1) and (2) above, officers will proceed on this matter in accordance with the Council's existing Scheme of Delegation; and**
- 4. the Council's Section 151 Officer be authorised to make the necessary changes to the Council's prudential indicators as a result of recommendation (2) above.**

1. Context to this report

- 1.1 The council is experiencing an increasing demand for temporary accommodation due to rising case numbers of families and individuals presenting as homeless or at risk of homelessness, mainly due to the cost-of-living crisis. We are also likely to see increased demand due to a range of Government schemes including asylum dispersal, support for Afghans including those leaving bridging hotels and Ukrainians presenting as homeless.
- 1.2 The council has been allocated funding of up to £573,175, through the third round of the Local Authority Housing Fund (LAHF 3). This grant has been made available to fund 40 per cent of the purchase price of four homes including a minimum of one unit of temporary accommodation by March 2026. This grant level is based on a median valuation. This accommodation is for use for the resettlement of Afghans, however the temporary accommodation element can be used for general use. We have previously purchased a property in the LAHF 2 round for temporary accommodation purposes.
- 1.3 The council is looking to acquire a minimum of one further unit of temporary accommodation through this grant funding. We do have an opportunity to apply for additional grant however at the moment the maximum amount of grant available through LAHF 3 is £115,100. The council would need to fund the remaining cost of the temporary accommodation if our request for additional grant is refused.
- 1.4 The potential acquisition of five units (see Proposals, below) of temporary accommodation would also be funded partly through LAHF 3 together with the Council's Investing in Growth Fund and Government grant, discount or relief schemes, any other options for external funding. The proposal has been assessed on the basis of borrowing and can be fully funded through savings in bed and breakfast costs. There is also a net saving return to the council as set out in 2.6 below.
- 1.5 The total ask is below the £2 million threshold within the investing in our growth fund and therefore under the Scheme of Delegation which was approved by Council in December 2019, approval can be made by Cabinet.
- 1.6 Acquisition of such accommodation is covered by the council's existing asset management and acquisition processes and meets the requirements from central government to make temporary accommodation available. Any resettlement properties acquired through LAHF 3 would be through a registered provider, with any temporary accommodation being owned and managed by the council. The grant funding for the temporary accommodation is only available if a registered provider agrees to take part in the scheme and purchases as least one unit of resettlement accommodation.

2. Proposals within this report

- 2.1 The council currently owns 52 units of temporary accommodation, which are a mix of shared and self-contained. The purchase of additional units of temporary accommodation would enable the council to fulfil its legal duties to meet the needs of local families or Afghans presenting as homeless.
- 2.2 Based on current valuations the cost of purchasing the five properties is likely to be up to £887,750 (including fees). The council can also claim £21,000 for any other costs, for example refurbishment and conveyancing costs. The median property price in our area is £287,750. The base grant rate per property for our local authority is £115,100 (based on 40 per cent of the median property price in our area). For the large resettlement element (four or more beds), 50 per cent of the median property price is provided. To facilitate delivery of new housing, an additional 10 per cent uplift to the grant rate will be added for each unit which we agree will be delivered as a new home. The balance of funding has been assumed to be funded from the Investing in our Growth fund.
- 2.3 The council has submitted a validation form to the Department for Levelling Up, Housing and Communities that confirms that up to £115,100 per property will be sought through LAHF 3 with an additional £21,000 per property for refurbishment works. Cabinet approval is being sought to acquire these units of temporary accommodation. This is an in-principle decision as the potential properties have been identified but not yet acquired. Therefore figures in this report are illustrative based on properties that are currently proposed by the landlord.
- 2.4 The LAHF 3 criteria requires that within each council area, in order to acquire at least one unit of temporary accommodation, at least three units of resettlement accommodation must be purchased. We are working with a registered provider to deliver three units of accommodation for resettlement of Afghans and this will be funded through LAHF 3 and the registered provider, with the council passporting the funding through to the registered provider.
- 2.4 Should this proposal be approved, we will seek to acquire five suitable properties for temporary accommodation, and this is likely to be in one of West Suffolk's six towns. Due diligence will be carried out as part of any potential purchase, and it is expected the council will purchase properties to the value in line with funding illustrated in section 2.6 below, with a maximum funding request of £887,750 for the purchase and additional £91,781 for additional staffing in the property services and temporary accommodation teams.

Funding

- 2.5 For each unit of accommodation, 40 per cent funding can be provided through LAHF3 and this is based on median house price. In order to purchase a unit of temporary accommodation, the council must therefore provide 60 per cent of the funding. This could be achieved through a range of sources such as the

council’s Investing in Growth Fund and Government grant, discount or relief schemes, any other options for external funding.

2.6 The table below shows the illustrative financial implications of the purchase based on the budget requested.

Capital Implications	£
Purchase Cost of building incl fees up to	782,750
Refurbishment of property	105,000
Total Capital Cost	887,750
Funded from:	
Local Authority Housing Fund	310,000
Local Authority Housing Fund - Refurbishment allowance	105,000
Investing in Growth Fund (borrowing)	472,750
	887,750
Annual Revenue Implications	£
Additional staffing for property building services / temporary accommodation housing teams recognising demands from the additional 5 units	91,781
Running costs of accommodation incl. building maintenance contribution	61,051
Income from running as temporary accommodation	(59,670)
Bed & Breakfast Savings	(139,613)
(Surplus) / deficit per annum before borrowing	(46,450)
Borrowing - Interest & MRP	26,059
(Surplus)/deficit per annum after borrowing	(20,392)
Return on total investment from Growth Fund (before borrowing and costs)	9.83 per cent
Return on total investment from Growth Fund (after borrowing and costs)	4.31 per cent

Assumptions:

- Running costs estimated based on experience with other similar units
- Income assumed at £270 per week with an 85 per cent occupancy rate
- Income will increase by CPI + 1% annually
- B&B savings based on £90 per night with an occupancy of 85 per cent
- Borrowing on an annuity basis, over 40 years at interest rate of 4.60 per cent
-

- 2.7 The figures in the table above include the full cost of prudential borrowing. However actual borrowing would only take place when the council's treasury management activities identify such a need. For example, this could be when the council's cash flow management activities anticipate that an external cash injection is required to maintain the appropriate level of cash balances for the council to operate and fulfil its budget and service delivery requirements.

3. Alternative options that have been considered

- 3.1 The council could choose not to provide this accommodation. However, this would mean not taking the opportunity to provide an additional unit of temporary accommodation with Government funding at 40 per cent of the capital cost. This also would not offer the opportunity to reduce the current bed and breakfast costs associated with our homelessness duty as a district council.

4. Consultation and engagement undertaken

- 4.1 Consultation has taken place with Portfolio Holders and Registered Providers.

5. Risks associated with the proposals

- 5.1 There is a risk associated with the purchase of any property but all the necessary surveys and due diligence will be undertaken and reviewed.
- 5.2 Income levels may fluctuate but this will be kept under review. This is due to void periods that may be experienced, damage or rent arrears.

6. Implications arising from the proposals

- 6.1 Financial – income levels and running costs of the property will be monitored.
- 6.2 Legal compliance - Acquisition of such accommodation is included in the council's acquisition policy and meets the requirements from central government to make temporary accommodation available.

- 6.3 Personal data processing - none
- 6.4 Equalities – this purchase supports the council to meet its equality duty by the provision of adapted accommodation.
- 6.5 Crime and disorder – provides accommodation to support those who are fleeing violence.
- 6.6 Safeguarding – as above
- 6.7 Environment or sustainability – the council will look to ensure that we maximise the energy efficiency of the property including loft, cavity wall and external wall insulation, solar panel systems and air source heat pumps. We will also ensure that the property purchased is at an EPC C or above.
- 6.8 HR or staffing – none – staff supporting this property are supporting the existing accommodation in Mildenhall and staff costs are factored into the income levels.
- 6.9 Changes to existing policies - none
- 6.10 External organisations (such as businesses, community groups) – Look to work with Registered Providers

7. Appendices referenced in this report

- 7.1 None

8. Background documents associated with this report

- 8.1 None

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Draft West Suffolk Annual Report 2023 to 2024

Report number:	CAB/WS/24/037	
Report to and date:	Cabinet	23 July 2024
Cabinet member:	Councillor Cliff Waterman Leader of the Council Tel: 07974 092289 Email: cliff.waterman@westsuffolk.gov.uk	
Lead officer:	Ian Gallin Chief Executive Tel: 01284 757001 Email: democratic.services@westsuffolk.gov.uk	

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

Recommendation: It is recommended that the draft West Suffolk Annual Report 2023 to 2024 attached to Report number: CAB/WS/24/037, be approved.

1. Context to this report

- 1.1 The draft West Suffolk Annual Report highlights the key activities and developments that have been achieved over the financial year 2023 to 2024, with regard to the priorities set out in the [West Suffolk Council's Strategic Priorities 2024 - 2028](#). This includes the council's activities to support local communities and businesses, following the adoption of the new priorities.
- 1.2 The Overview and Scrutiny Committee is considering the annual report on 18 July 2024 (Report number OAS/WS/24/009 refers).
- 1.3 As the agenda papers for the Cabinet meeting will be despatched prior to the meeting of Overview and Scrutiny Committee on 18 July 2024, any amendments recommended by the Committee, will be provided to the Cabinet in an addendum following that meeting.
- 1.4 The annual report is presented as bitesize information that is easy to share with residents, parish councils, partners and stakeholders. It can also be used as part of our strategic communications approach and communicated or used in the media and on social platforms.
- 1.5 We are continuing the approach in producing a shorter document using icons and summary text, as opposed to the full written report. Feedback has suggested that these icons and summary text give a strong and easily digestible summary of the council's work over the previous 12 months and can be used in a number of ways, including, for briefing materials and social media.
- 1.6 We will continue to publish these, and other examples, not highlighted in the icons and summary text, throughout the year, as well as updating them as the council makes new achievements. This will be carried out in the media as well as posting where appropriate in community social media groups.
- 1.7 This annual report forms part of a wider suite of documents that report on the performance of the council, including the Annual Statement of Accounts and performance dashboards, all of which are available on our [performance webpage](#). The annual report will be published alongside the Annual Environmental Statement, highlights from which are included as an appendix to the annual report following a recommendation from the former Environment and Climate Change Taskforce.

2. Proposals within this report

- 2.1 It is good practice for local authorities to produce an annual report alongside the Statement of Accounts. It is a way of keeping our residents informed about our activities and how they contribute to our wider

strategic priorities for the West Suffolk area. It is therefore proposed that West Suffolk Council should publish an annual report covering 2023 to 2024.

- 2.2 The draft report contains examples drawn from a range of service areas, in order to demonstrate the range of activities undertaken by the council.

3. Alternative options that have been considered

- 3.1 The alternative option is to not produce an annual report. However, it is good practice for councils to report on progress against their priorities in this way and ensures transparency on how they spend public money. The report also reflects the excellent work which has been delivered across West Suffolk during a challenging period.

4. Consultation and engagement undertaken

- 4.1 The draft report was compiled in conjunction with Service Managers and Leadership Team and will be reviewed by Overview and Scrutiny Committee on 18 July 2024.

5. Risks associated with the proposals

- 5.1 Misunderstanding of the role of the report (for example, it can only give highlights of West Suffolk Council's activities, not every action taken). This will be mitigated by developing a communications plan to clearly explain the role of the report.

6. Implications arising from the proposals

- 6.1 None apply because this is a report reflecting on the achievements of the council.

7. Appendices referenced in this report

- 7.1 Appendix 1 contained within the Annual Report – Highlights from the Environmental Statement 2023 to 2024.

8. Background documents associated with this report

- 8.1 West Suffolk Council's Strategic Priorities 2024 - 2028.

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West Suffolk
Council



West Suffolk Annual Report
2023 to 2024

Foreword

- Foreword from the Leader and Deputy Leader to be added later

Introduction

The four strategic priorities set by the new administration in December 2023 for West Suffolk Council are:

- Affordable, available, and decent homes
- Environmental resilience
- Sustainable growth
- Thriving communities

What does this look like?

Affordable, available, and decent homes

In order to deliver on our strategic priority of affordable, available and decent homes, we will:

- Use planning powers to significantly increase the supply of affordable housing in West Suffolk, particularly for social rent, and explore other options for increasing provision.
- Investigate options to address the specific market conditions in West Suffolk that make it challenging for local people to afford to buy or rent.
- Use the council's planning, regulatory and other powers to ensure all housing is of good quality and sustainably built and has minimal environmental impacts, including noise.
- Work with communities to ensure all housing is supported by the right infrastructure.

Environmental resilience

To deliver on our strategic priority of environmental resilience and our ambition to be net zero by 2030 as a council, we will:

- Bring about environmental improvements that support progress to net zero, including work in partnership with businesses, residents and others.
- Work together to implement actions to adapt to climate change in West Suffolk, in line with the third National Adaptation Programme.
- Promote improved public and active travel opportunities in West Suffolk and work to reduce the impact of heavy goods vehicles in communities.

Sustainable growth

In order to deliver on our strategic priority of sustainable growth, we will:

- Support new and existing businesses to grow, for example, through start-up support and skills development.
- Work to ensure West Suffolk is an attractive place for businesses, to ensure growth is supported by employment. This will have a particular focus on attracting higher-skilled enterprises to support wage growth.
- Continue to support West Suffolk's local high streets and markets as the vibrant centres of thriving local communities.
- Seek to develop infrastructure that supports growth.
- Maximise what makes us distinctive.

Thriving communities

In order to deliver on our strategic priority of thriving communities, we will:

- Ensure all West Suffolk residents are able to access appropriate services, benefits and support.
- Enable West Suffolk residents to improve their physical and mental health and wellbeing through sport, physical and cultural activities, as well as access to health services. In particular, nurture and protect parks and open spaces for the benefit of both residents and visitors.
- Work with partners to prevent and reduce crime and antisocial behaviour in the district.

Engagement

Through our strategic priorities West Suffolk Council has established a strong commitment 'to ensuring that everything we do takes account of the needs and views of local communities, residents, businesses and interest groups'. In this year, we have committed to establishing Councillor-led panels that will cover:

- environment and sustainability
- towns and high streets
- health
- the horse-racing industry
- transport

In this year, we have undertaken consultation and engagement on the emerging West Suffolk Local Plan, the new Housing, Homelessness Reduction and Rough Sleeping Strategy and a new street trading policy, all detailed in the pages of this report.

During this first year of our administration we have been talking to and engaging with a range of groups and partners to understand their needs and how we can work together. This has included councillor tours of West Suffolk's towns and rural areas and engagement with Abbeycroft Leisure, Cambridgeshire district councils, Homes England, private sector landlords, registered providers, the wider Suffolk system, the United States Air Force, the Suffolk Climate Change, Environment and Energy Board, Transport East and the horse racing industry among many others.

You can read more on this at [Strategic priorities \(westsuffolk.gov.uk\)](https://www.westsuffolk.gov.uk).

Affordable, available, and decent homes



611 new homes were built in West Suffolk during 2023 to 2024, of which 30 per cent were classed as 'affordable housing' and 6.6 per cent were for 'social rent'.



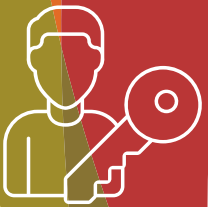
Barley Homes (the council's housing company) purchased land to build 13 homes at Rougham, alongside taking on option on adjoining land to potentially facilitate another 27 homes. The company is working with the council are working on a development brief to accompany a future planning application that may provide as many as 180 homes in Great Barton. Barley Homes continued to appraise numerous sites to work towards achieving its target of delivering 40 new homes per year as detailed in its business plan 2023 to 2028 [here](#).



£1,426,858 of Local Authority Housing Funding was used to deliver ten units of accommodation in partnership with local registered providers for the resettlement of Afghans and Ukrainians this year. This includes one unit of temporary accommodation being purchased by the council for general needs use.



The new Housing, Homelessness Reduction and Rough Sleeping Strategy will help direct the council's approach to housing over the next few years. 145 responses were received to a public and stakeholder online consultation in this year. Three member workshops were held, each of which focused on a different priority area.



Five proactive and 106 routine inspections of Houses in Multiple Occupation (HMOs) were undertaken this year. Following a review of the issues identified through these inspections, in April 2024 we wrote to all landlords about their responsibilities and to tenants about how they can report issues, while assuring that their confidentiality will be maintained. The letter to tenants in HMOs was translated into more than a dozen languages to make it more accessible for tenants from different backgrounds.



The Private Sector Housing Team took part in two multi-agency impact days alongside Suffolk Fire and Rescue Service, the police and other partners to pro-actively inspect accommodation above commercial premises. Nine premises were visited by the team.



2.2 million of Government funding has been secured by Suffolk's districts and boroughs to improve the standard of private rented homes. The project approved by DLUHC will focus on engagement with landlords, tenants and communities to achieve compliance by self-regulation with enforcement as a last resort.



Following efforts this past year, 36 more landlords have signed up to work with the council. West Suffolk Letting Partnership continues to encourage more landlords to work with them in housing council placed tenants.



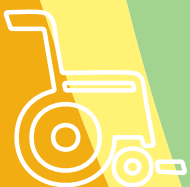
West Suffolk has invested £180,000 in energy efficiency improvements to homes used to support homeless people. All of these are also being supplied with 100 per cent renewable electricity with the majority of this generated locally from Toggam solar farm. The overall saving is predicted to be 22 tonnes of carbon dioxide a year.



Safe Suffolk Renters is a Suffolk-wide initiative backed by government funding to improve standards in the private rented sector through building relationships between tenants, landlords, property managers and councils. Specific actions include a Suffolk-wide housing stock condition survey, support for landlords, tenants, and the Private Sector Housing teams across Suffolk through additional resource, intelligence, and training.



Tenants of period properties with low Energy Performance Certificates (EPC) ratings are enjoying lower energy costs and cosier homes thanks to work carried out by their landlords and West Suffolk Council. Ten properties at the Euston Estate and four Metcalfe Almshouses in Hawstead have been fitted with several energy efficiency measures, through funding from the Government's Sustainable Warmth funding and landlord investment.



Since the new Independent Living Service was introduced in December 2020, the number of Disabled Facilities Grants approved has increased from 72 in 2020 to 211 in the year ending 31 March 2024. The number of grants completed has increased from 108 in 2020 up to 214 completed in the year ending 31 March 2024. On average this equates to four applications approved and completed every week.



During 2023 to 2024, we assisted 205 West Suffolk households with adaptations to their homes. This saw £1,668,887.29 million spent on providing essential adaptations and facilities to enable elderly, disabled and vulnerable residents to live independently and safely in their homes through the Disabled Facilities Grant.



1,275 households who were at risk of homelessness were provided with advice and support. In 2023 to 2024, 321 households were successfully provided with advice, or the risk of homelessness resolved, at the first point of contact. 286 were owed a prevention duty, whereby the council must take reasonable steps to prevent the individual or household from becoming homeless and 668 were owed a relief duty, when the council must take reasonable steps to secure suitable accommodation for them.



The national figures for the number of homeless people sleeping outdoors, termed rough sleepers by the Government, increased from six to eight in West Suffolk. The figure is based on a snapshot and fluctuates almost daily as people are accommodated and other people either become homeless or lose their place of accommodation.



The council is continuing to fund a personalised healthcare service in partnership with health outreach and Sanctuary Housing for rough sleepers in supported accommodation with £30,000 per year for two years.

Environmental resilience

A summary of the council's environmental performance can be found in the Environmental Statement [here](#), which is a summary of the council's progress to net zero. Other environmental initiatives include the below:



A trial of four reverse vending machines provided by the council began, in partnership with Love Newmarket BID, The Guineas Shopping Centre, Abbeycroft Leisure, Eastern Education Group, Our Bury St Edmunds BID and Trovr.



In February 2024, a package of measures to reduce Great Barton's air pollution was agreed by West Suffolk Council's cabinet.



West Suffolk Council's European pilot project to speed up transition to low carbon energy networks has saved local businesses £407,000 and 350 tonnes of carbon a year. The four-year project, completed in April and part-funded by EU organisation Interreg, saw the council work with local companies to test the use of innovative energy technology.



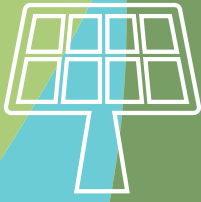
3,000 bulbs were planted in the Abbey Gardens in Bury St Edmunds in November 2023, by volunteers, local schools and West Suffolk Council



This year, the council has committed an additional £2.75 million in capital investment to support our net zero ambitions through the Net Zero Fund.



During 2023 to 2024, Toggam solar farm, owned by the council, generated 11,851 megawatt hours (MWh) of renewable electricity, which was 4 per cent above target for the year, with the financial performance far exceeding the original target. The electricity that is sold into the National Grid is enough to power around 3,320 homes and offset the carbon dioxide emissions from 1,509 cars.



The Solar for Business programme, offered by West Suffolk Council, has just seen its best year so far with 2.5MW installed, and saving 1,887 tonnes of carbon emissions since the scheme started in 2016. This year, 86 businesses have benefitted, in both towns and villages, with 7.6MW of solar installed through the scheme.



1.4MW of solar energy capacity was installed across the council's operational buildings, saving a further 354 tonnes of carbon emissions.



A £1 million Decarbonisation Initiative fund was launched in West Suffolk to help community organisations reduce their carbon emissions and make energy savings.



Using this Fund, West Suffolk Council made the first payment to help town and parish councils with the cost of rapidly converting streetlights to more efficient light-emitting diode (LED) lanterns. The transition is expected to reduce the town and parish councils' energy consumption by at least 70 per cent and eventually save over 200 tonnes of CO₂ per year.



West Suffolk Council has installed six more town centre electric vehicle charging points in Bury St Edmunds, available for the public to use. This is in addition to the deal the council has signed to install around 100 new slow, fast, and rapid public points on council-owned land.



Young people heard a keynote speech by a wildlife presenter and award-winning photographer at Suffolk's first youth conference on climate change. 96 students aged 12 to 17 years from across the county attended the day, held at West Suffolk College, with workshops and networking about tackling the climate emergency in Suffolk.



The first electric street sweeper in West Suffolk Council's fleet was at work in Haverhill last summer, keeping the town's air cleaner as well as its pavements. In May 2023 alone, it saved 653kg CO₂e compared to an equivalent diesel sweeper.



A £150,000 fund opened to applications from not-for-profit organisations looking to deliver community-based carbon reduction projects in Suffolk in June 2023.



A new member-led referencing group was created this year to focus on tackling climate change and environmental issues across the district, supported by an officer working group.



In October 2023, we introduced a new water consumption metric to the existing suite of environmental key performance indicators (KPIs). This will allow us to measure the amount of water the council uses with a view to reduce water consumption in the long term.



Since August 2023, we have included reference to our net zero ambition in job adverts and our recruitment website. This applies to all relevant jobs that have a link to the work to reduce council emissions and improve the environment. The inclusion of this information helps to communicate the importance of the environment and sustainability to new staff.

Sustainable Growth



The emerging West Suffolk Local Plan which will guide where new homes can and cannot be built between now and 2040, and also allocate land for business growth went through its final stage of public consultation. The Submission Draft consultation on the West Suffolk Local Plan took place between January and March 2024 during which time 187 individual participants gave feedback, generating around 1,000 individual representations to the plan and supporting documents.



This year, West Suffolk residents, street traders, businesses and other stakeholders were asked for their input to help shape a new street trading policy for the district, in a consultation garnering 154 responses.



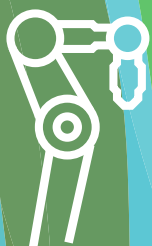
The council announced three new and exciting deals tailored exclusively for local market stallholders which are set to support new and existing traders to thrive and flourish. These include free trading, gazebo insurance and a Market Pass to trade in the Bury St Edmund's Wednesday market at a discounted rate. A Markets Development Plan has been commissioned following on from the Markets Review, which will be implemented from 2024.



In October 2023, we allocated funding from the UK Shared Prosperity Fund to support projects in our local towns. Grants of up to £10,000 for each town were available and required match funding from the town council or Business Improvement District at a rate of 40 per cent.



We completed the first phase of landlord improvements at Provincial House in Haverhill and received Cabinet approval for an additional investment of up to £2 million in capital works to complete the next phase of refurbishment. We have secured West Suffolk College as a major new tenant, with the college relocating their Adult Learning Centre back into the town centre.



We continue to support the Advanced and Manufacturing Engineering (AME) sector through a £12.1 million investment that will provide space for new businesses in that sector to flourish and be supported as well encourage jobs growth. The council purchased 6.8 acres of land at Suffolk Business Park in Bury St Edmunds to develop an 80,000 square foot AME Centre in two phases.



West Suffolk Council partnered with the Suffolk Chamber of Commerce to support business growth and economic development across the district. The Suffolk Chamber of Commerce will also champion West Suffolk in its lobbying role.



We have brought more employment and business opportunities into the district by establishing a commissioning fund to progress a number of sustainable growth initiatives including along the A11 corridor near Mildenhall, and along the A1307 and A14.



The EcoCarriers Shop and Drop scheme launched in Bury St Edmunds this year, through which pedal-powered delivery crews are helping businesses give a greener level of service. The project was supported by West Suffolk Council and Suffolk County Council as well as Our Bury St Edmunds BID.



West Suffolk high streets continue to perform strongly, with only 8.8 per cent of commercial units across the six market towns being vacant as of 31 March 2024, compared to the UK average of 14 per cent.



Bury St Edmunds hosted heats and a regional final of the National Young Market Trader Competition in July 2023.



Alongside a mix of regular street markets, the council organised and promoted specialist market events including monthly Makers Market in Bury St Edmunds, Newmarket, and Haverhill.



We awarded £35,000, as part of the Council's allocation from the Rural England Prosperity Fund to the Newmarket Cinema project, which will see a silver screen opening in the town later in 2024.



West Suffolk car parks continue to perform strongly, with an increase of 13.53 per cent in off-street and on-street car parking events this year compared to last year.



Suffolk's district and borough councils and New Anglia Local Enterprise Partnership (LEP) partnered to invest over £1 million in business support and development services, including advice to reduce carbon emissions from July 2023 to March 2025.



The West Suffolk Business Festival in October 2023 was the 13th year the council has collaborated with local business support organisations to deliver two weeks of business events across West Suffolk, attended by over 250 business leaders.



200 youngsters from primary schools based in Mildenhall took part in one of the only careers events for younger primary school children in the country, through the Eastern Academies Group Skills Escalator programme that we help organise and deliver.



Hundreds of local jobseekers were able to access employment and upskilling opportunities at jobs and skills fairs delivered in partnership with the Department for Work and Pensions, in Bury St Edmunds, Haverhill, Mildenhall and Newmarket.



We have continued to deliver 'Choose Hospitality' in partnership with the Culinary Arts Academy at West Suffolk College. The programme celebrates the varied career options on offer within the sector and encourages young people to consider a career in the industry.



The council is committed to offering the opportunity for apprenticeships as a career path. As of March 2024, West Suffolk Council had 31 apprentices, compared to 30 the year before.

UK Shared Prosperity Fund (UKSPF) and Rural England Prosperity Fund (REPF)

The council agreed an investment plan for its £1,943,467 million share of the Government's UKSPF to further strengthen the West Suffolk economy, improve job opportunities, town centres and rural areas as well as support community groups over the three years. The funding is being delivered over three years and in the year of April 2023 to 31 March 2024, £471,715 of UKSPF was provided to support projects such as the following:

The council was also a recipient of REPF funding, a top-up to UKSPF funding aimed at supporting the Levelling Up White Paper and Future Farming Programme. Within West Suffolk this can be used everywhere outside Bury St Edmunds, with a total sum of funding of £753,701 spread across two years (2023 to 2024 and 2024 to 2025). In the year of April 2023 to 31 March 2024, £188,425 was provided to support projects such as those listed below:

UKSPF

- Community sports clubs from across West Suffolk could apply for a council grant to help increase participation and further enhance activity. Grants of between £200 and £1000 were made available under West Suffolk Council's Capital Sports Fund.
- Lapwing Education were commissioned to deliver targeted and intensive support for young people aged 16-24 to gain and sustain employment or education.
- Community and environment charity Groundwork East partnered with Suffolk's local authorities to deliver free and impartial expert advice to help businesses and organisations save energy, reduce their emissions and establish tailored decarbonisation plans.
- Additional cycle parking at Bury St Edmunds station, which services over 600,000 passengers each year. This will provide approximately 50 additional cycle spaces, supporting cycling to the station.

REPF

- Capital grants with a value between £5,000 to £10,000 to support small businesses looking to grow and expand.
- A new bridge and new pathways in Newmarket to make better connections to the Guarded Orchard.

Thriving communities

In September 2023, Mildenhall was awarded Most Active Town in the Suffolk Community Awards in recognition of the great strides that have been made to increase physical activity levels.



A brand new £122,000, free-to-use pump track opened in Mildenhall in December 2023, built by West Suffolk Council.



The Mutiny in Colour art exhibition in Bury St Edmunds, Haverhill and Newmarket from June to October 2023 saw 13,850 visitors. A visitor survey found that 98 per cent of respondents described the exhibition as excellent or good and 93 per cent thought it was good or very good value for money.



The Apex in Bury St Edmunds had its best financial year on record, both in box office income and ticket sales, with 113,356 tickets sold worth £2.7 million between April 2023 to March 2024. The venue achieved a 73 per cent capacity in the main auditorium, meaning 73 per cent of all tickets available were sold throughout the year.



The two-day Dragon Fest saw more than 2,285 people descend on the West Stow Anglo-Saxon Village in June 2023.



13,964 school children visited West Stow Anglo-Saxon Village and Moyse's Hall saw 2,685 school visitors.



Between October 2023 to January 2024, 4,600 people visited the Film and Sci-fi exhibition, a prop and merchandise display with family trails and activities in Moyse's Hall.





Upgraded conveniences with Newmarket's first Changing Places facility opened in September 2023 following the £330,000 upgrade of the Guineas public toilets.



Since April 2023, the council has also made two levels of Parkway multi-storey car park in Bury St Edmunds available exclusively to hospital workers from Monday to Friday through a permit scheme.



The 2023 to 2024 Local Council Tax Reduction Scheme introduced a change to the maximum reduction on Council Tax that a West Suffolk resident could receive. Whereas previously the maximum reduction was 91.5 per cent, this was increased to 100 per cent, to support low-income working age residents.




77 Community Chest funding applications were received totalling £1,319,843.12. Community Chest had £466,733 available for allocation for 2023 to 2024. Within the full allocation, £245,000 was provided to West Suffolk Citizens Advice. The scheme was oversubscribed by 282 percent. 46 applications were considered by the Grant Working Party (GWP) to the value of £1,066,087.12. Overall, the GWP recommended funding to 32 organisations (60 per cent) of the projects in either full or part to the value of £466,733.



This year, we maintained our annual £61,000 grant to the Theatre Royal in Bury St Edmunds for core costs.



The overall spend on Locality Budgets for 2023 to 2024 was £159,758.21, from a budget of £179,200. The End of Year Transparency Report for a full overview of grants paid can be found [here](#).



Feel Good Suffolk launched and is now fully operational this year. The service supports residents in Suffolk to make positive changes to their health and wellbeing. 947 referrals had been received as of 31 March 2024 for West Suffolk (19.7 per cent), out of a total of 4,799 across Suffolk. In West Suffolk, 43 per cent were 'weight management' related, 24.5 per cent were to 'quit smoking' and 32.3 per cent were 'physical activity' related. 52.4 per cent of referrals are self-referrals, with 47.6 per cent made by healthcare professionals. In response, 3,887 contacts were made, 483 interventions have been provided and 137 appointments held.

In collaboration with West Suffolk NHS Foundation Trust, 2,612 GP referrals were made to Abbeycroft Leisure which helped improve residents' health and wellbeing. Within the first 12 weeks, 65 per cent of those active experienced an increase in their wellbeing.

The council was awarded £213,500 of funding by Sport England to help offset increased utility costs and ensure its swimming pools remained open. This support follows £300,000 that the council agreed to make available as part of the 2023 to 2024 budget.

West Suffolk Council has continued to coordinate the Government's Holiday Activities and Food programme during the school holidays. The council used part of the funding to extend the scheme to other families in financial hardship who would not otherwise qualify for the scheme. A total of 7,156 places were booked with a spend of £295,767 this year funded through the Department for Education and supported by the county council.

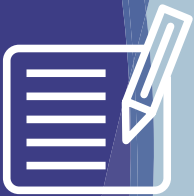
The council is working with expert advisors to develop proposals to invest in essential maintenance and explore what additional refurbishments and service improvements are possible in the current Bury St Edmunds leisure facilities. This follows the cancellation of the Western Way Project in September 2023, due to national uncertainty over public and household finances, and the risk this placed on the council's short-term finances. Further news and engagement on this important project will take place in Summer 2024. The scheme is part of our long-term investment in leisure facilities across West Suffolk.

Getting the essentials right

In March 2024, 46 per cent of all contact with the customer service team was online, compared to just 31 per cent in March 2020. This means there are more opportunities for customers to access services and make contact with the council at a time that is convenient to them. For people who are unable to access services online, the council continues to provide a telephone customer service. Where a face to face or virtual conversation is preferable, appointments are arranged at a time that suits the customer.



One of the knock-on effects of the pandemic was a delay to food safety inspections. That in turn had created a backlog of some 982 businesses awaiting inspection at the beginning of April 2022. But over the past two years, the commercial environmental health officers have managed to reduce this waiting list by 90 per cent by 31 March 2024. During 2023 to 2024, 605 food safety inspections were carried out, helping give customers confidence in where to eat and supporting businesses in ensuring public safety.



During 2023 to 2024, the council responded to 410 reports of environment crime from residents and businesses, resulting in 38 abandoned vehicles and almost 25 tonnes of waste being removed.



More than 4.8 million bins from West Suffolk households were emptied during the year, resulting in 10,332 tonnes of recycled waste and 38,908 tonnes of non-recyclable household waste being sent for processing at the Energy from Waste facility in Great Blakenham.



In 2023 to 2024, 31,463 households subscribed to the garden waste collection service, through which 12,746 tonnes of garden waste were collected and composted locally. Last year, 33,355 households subscribed to the garden waste collection service, through which 10,862 tonnes of garden waste were collected and composted.



The council is preparing for 'Simpler Recycling', Government legislation for councils to align their household waste and recycling services.





£200,000 was invested in the council's grounds maintenance service through increased skilled workforce and additional investment in new green equipment for operational efficiencies.



During 2023 to 2024, we determined 2,151 planning applications supporting the supply of new housing including affordable housing, and business growth across the district.



43 major, 208 minor and 702 'other' (for example, change of use, listed buildings and adverts) planning applications were granted during 2023 to 2024, compared to 43 major, 247 minor and 814 'other' in 2022 to 2023.



West Suffolk Council was recognised for its part in keeping the housing market moving and won Best Migrated Local Authority in the 2024 Land Data Awards for Excellence.



Councillors continued to be supported through a development framework focused in this year on raising awareness of operational teams and functions and building relationships across the council. Bespoke training was provided to the Performance and Audit Scrutiny Committee to further develop its role.



The council committed to a review of how portfolio holder (Cabinet Member) decisions are made alongside a review of how exempt information is reported to ensure transparency and robust procedure.



We conducted a review on all of our key performance indicators (KPIs) which included input from Internal Audit, Portfolio Holders and the Performance and Audit Scrutiny Committee. We added Office for Local Government metrics to ensure our data were benchmarked against national trends.

Appendix 1

- 70 electric vehicles can now charge simultaneously as a result of council-installed chargers. These charges deliver the equivalent of 421,490 miles of power.
- The amount of renewable energy generated by West Suffolk Council projects is 183 per cent higher than 2012 levels. The amount of power now being generated could power 239 average homes for one year.
- The total amount of waste generated at West Suffolk House in 2023 to 2024 was down 17 per cent compared to 2022 to 2023.
- The percentage of all waste that was recycled from West Suffolk House was 73 per cent this year. This was a 5 per cent decrease on last year, as a result of a significant decrease in the amount of confidential waste being produced.
- The amount of fuel used for West Suffolk Council vehicles and equipment decreased by 1 per cent on last year, resulting in a 3 per cent drop in emissions.
- A total of 705 whips were supplied by the Woodland Trust and 136 trees were planted on West Suffolk owned land last year. This includes 600 whips planted by volunteers from the local community in Brandon Country Park and Nowton Park.
- Six Green Flags were retained for the council's parks and open spaces at the Abbey Gardens, East Town Park, Brandon Country Park, Aspal Close Nature Reserve, West Stow Country Park, and Nowton Park.
- The total amount of amenity grass that we maintained and operated, including highway verges, amounted to 308 hectares on an approximately three-weekly cycle. This is the equivalent to 432 football pitches and a significant proportion of it is made up of very small patches of grass in and around our residential areas.
- We sought to increase biodiversity by cutting certain areas later in the season. This has included leaving larger areas of uncut grass around trees and shrubs in our parks.
- Grid electricity consumption by West Suffolk Council rose by 13 per cent compared to 2022 to 2023. Gas consumption by West Suffolk Council was down by 28 per cent on 2022 to 2023. The increase can be attributed to a phased return to our offices and an increase in the number of buildings being supplied with electricity.
- Grid electricity consumption by Abbeycroft Leisure rose by 3 per cent compared to 2022 and 2023. Gas consumption by Abbeycroft Leisure decreased by 3 per cent compared to 2022 and 2023.
- The total emissions in 2023 to 24 from all activities the council is directly responsible for (including but not limited to buildings, fleet and transportation) was up 1.3 per cent compared with 2022 to 2023.
- Water consumption by West Suffolk Council increased by 3 per cent compared to last year.

The logo for West Suffolk Council features the text 'West Suffolk' in a large, white, sans-serif font, with a white swoosh underline. Below this, the word 'Council' is written in a smaller, white, sans-serif font. The logo is centered on a background of overlapping, curved bands of color: purple, dark blue, green, and teal.

West Suffolk
Council

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West Suffolk Environment and Climate Change Update Report: 2024

Report number:	CAB/WS/24/038	
Report to and date:	Cabinet	23 July 2024
Cabinet member:	Councillor Gerald Kelly Portfolio Holder for Governance and Regulatory Tel: 07968 396389. Email: gerald.kelly@westsuffolk.gov.uk	
Lead officer:	Jill Korwin Strategic Director Tel: 01284 757252 Email: democratic.services@westsuffolk.gov.uk	

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. confirms its commitment to addressing the Climate and Environment Emergency and, in particular, to reaching net zero by 2030 in respect of Council operations.**
- 2. Approves the review, and implementation, of the action plan as set out in sections 2 and 3 of Report number CAB/WS/24/038, together with the draft plan at Appendix A.**

1. Context to this report

- 1.1 In 2019, West Suffolk Council set up an Environment and Climate Change Taskforce and declared both a climate and environmental emergency. That taskforce made recommendations to Cabinet and an action plan was agreed. The council committed to achieving Net Zero in respect of its own operations by 2030. The action plan was then reviewed annually and reported to Cabinet in July.
- 1.2 In June 2023, the Leader of the Council announced a new working group to review the existing action plan, and in particular to consider additional actions the council could take to support and encourage West Suffolk residents and businesses to address the climate and environmental challenge.
- 1.3 Since then, the working group has become the Environment and Sustainability Reference Group (ESRG), chaired by Councillor Julia Wakelam, which reviews the progress of key tasks and projects of the Environment and Climate Change Action Plan, the council's performance and Annual Environmental Statement.

2. Progress against actions

- 2.1 The agreed action plan is structured under the following themes:
 - **Communities and Communication.** The Committee on Climate Change reports that, to achieve carbon neutrality, 62 percent of emissions reductions will come from behaviour change. Technological change alone is not enough; residents and businesses need to be encouraged and supported to make positive changes to their behaviours. This section recognises the importance of all parts of West Suffolk being involved in the plan and for communications and engagement to take centre stage. One of the objectives of the second phase of Decarbonisation Initiatives Fund grants (approved by Cabinet on 9 July 2024) will be to start a large number of community conversations about, and raise the profile of, energy saving measures.
 - **Corporate Action.** This section brings together the activity that the council is taking to address its own environmental performance, for example in regard to fleet electrification, less use of resources and decarbonisation of its buildings and our role in waste collection.
 - **Existing Housing.** Housing remains a key issue, with over 25 per cent of carbon dioxide (CO₂) emissions across Suffolk coming from homes. Poorly built and insulated homes contribute the most as well as adversely impacting house dwellers' health and pockets. Whilst planning and building regulations can address the standard of new homes that are built in West Suffolk, the council should do more to support homeowners to improve the efficiency of existing housing stock.

- **Planning and Regulatory.** This theme focuses on the key role of planning, building control, licensing, housing and environmental health play in addressing climate change.
- **Environment and Biodiversity.** This theme brings together all activity that protects and enhances West Suffolk’s natural environment, including land owned by West Suffolk Council.

2.2 Overall, we are trending away from the use of natural gas to electricity. When comparing electric energy to natural gas, there are several factors highlighting the environmental benefits of electric energy.

- Electricity has lower CO2 emissions, particularly as the energy grid converts to renewable generation, whereas natural gas entails a combustion process, which emits CO2.
- In addition, the natural gas extraction process can have significant environmental impacts, including water contamination and habitat disruption, while renewable energy sources have a smaller environmental footprint once installed, as they do not require ongoing extraction of fuel.

The ongoing shift towards renewable electricity further enhances its environmental benefits, making it a more sustainable choice in the long term.

2.3 In addition, Suffolk County Council has successfully completed the conversion of the final 500 or so West Suffolk Council (WSC) owned streetlights to light-emitting diode (LED) technology. The resulting emissions savings from this conversion have not yet been incorporated into the current emissions savings metrics. This significant achievement marks the completion of a comprehensive streetlight upgrade initiative for West Suffolk Council that began last year and was extended to the conversion of parish and town council owned lights through the Decarbonisation Initiatives Fund. Suffolk County Council (SCC) has also been converting its streetlights. By March 2025, the aim is that all council-owned streetlights in West Suffolk will be LED.

2.4 The draft 2024-2025 Action Plan is included as Appendix A. In considering the current plan and current challenges there are a number of specific opportunities the ESG want to highlight, and these have been included in the draft plan.

2.5 **Carbon emissions show a slight increase, although they remain lower than pre-pandemic levels. Further analysis can be found in the Environmental Statement (Appendix B).**

- **Total emissions up 1.3 percent compared to 2023-2024**
- **Renewable energy generated up 68 percent compared to 2019-2020**
- **Total owned vehicle emissions down 12 percent compared to 2019-2020**
- **Business travel down 47 percent compared to 2019-2020**

- **Total water consumption down 3.4 percent compared to 2019-2020**
- **The recycling rate 73 percent, down 5 percent compared to last year**
- **Total West Suffolk House waste down 64 percent compared to 2019-2020**
- **During 2023-2024, we held six Green Flag status parks**
- **Public electric vehicle (EV) chargers installed by WSC can support 70 EVs charging at the same time**
- **Energy delivered to drivers powered 421,490 miles**
- **136 trees and 600 whips planted during 2023-2024.**

2.6 The Carbon Budget agreed at Cabinet in 2020 is included in the Environment Statement. The net zero plan which formed part of the 2020 report illustrates potential routes to net zero by 2030. This is broken down into potential workstreams, such as reducing emissions from existing buildings, investing in renewable generation projects, and moving fleet to electric/hydrogen solutions. These are reflected in the strategic action plan (Appendix A). As this work progresses, the aim will be to develop the carbon budget further, allowing us to breakdown carbon targets in more detail across the key emissions areas, and develop more precise targets for each.

2.7 The carbon budget periods are:

- a. April 2020 – March 2024 – steady annual emission rate of 4,675 tCO₂e/year
- b. April 2024 – March 2028 – steady annual emission rate of 2,484 tCO₂e/year
- c. April 2028 – March 2030 – steady annual emission rate of 840 tCO₂e/year
- d. Zero emissions in 2030-2031.

2.8 For year 2023-2024, the council is in the second period of the carbon budget. Emissions stand at 4,979tCO₂e against the target budgets to be achieved 2028 of 2,484tCO₂e to maintain trajectory to net zero. The data shows that a key contributor to the increase in emissions is from the council's leisure operations delivered by Abbeycroft Leisure. There has been a 0.5 percent decrease in emissions from council activity and a 4.6 percent increase in emissions from Abbeycroft Leisure compared to 2022-2023. A review of all leisure centres is currently underway to identify building improvements that will address emissions. The council had identified a range of improvements and made an application to the Government's swimming pool fund in 2023-2024 but was only awarded £35,000 to deliver some filtration improvements. Proposals will therefore need to be brought forward as part of the council's Net Zero Investment Fund as budgets allow.

2.9 It is also worth noting that the council's waste collection vehicle fleet is projected to increase in the coming year due to new government 'Simpler Recycling' requirements. These regulations, aimed at improving waste

management practices and recycling, have placed an additional operational burden on waste collection services. Consequently, to comply with these standards, the number of waste collection vehicles needed is expected to increase. Given the challenges of collecting waste in a rural area, this growth in the fleet size will likely lead to higher overall emissions, highlighting the need for balancing regulatory compliance with sustainable practices to mitigate environmental impact.

2.10 Key Successes at West Suffolk

In addition to securing the Decarb Budget, other successes against the taskforce action plan include:

Theme	Key successes
Housing	<ul style="list-style-type: none"> • Over the course of 2023-2024, 151 homes, under Flagship, have been retrofitted. • Over 2023-2024, the Home Upgrade Grant scheme has delivered the following: <ul style="list-style-type: none"> ○ 10 properties completed. ○ 34 applications approved (works progressing) ○ 150 applications awaiting approval from contractors/ awaiting start date. ○ Total Investment £121,658. • The proposed Housing Strategy includes housing improvement commitments that includes retrofit.
Communities and Communication	<ul style="list-style-type: none"> • Over the course of the year, the council has been involved in numerous national, regional, and local campaigns, including: <ul style="list-style-type: none"> ○ Food Savvy – 23 October 2023 for four weeks social media and advertising campaign. ○ Glass – ‘Its better in the bank’ refresher in January via social media. ○ Suffolk School Skills Days in October 2023 – The team attended events in Haverhill, Newmarket and Bury St Edmunds. Teaching children about recycling and showing them around a bin collection lorry. ○ Food Waste Week (18th - 24th March 2024). ○ Stop Food Waste Day (24th April) social media campaign.
Planning and regulation	<ul style="list-style-type: none"> • The emerging Local Plan has a strengthened Environmental Policy. • A new tree strategy and green infrastructure policies were developed and submitted to the Local Plan process. • The Planning team will recruit a new Ecologist post over the summer 2024.
Corporate action	<ul style="list-style-type: none"> • New water KPI added to corporate performance monitoring in October 2023.

	<ul style="list-style-type: none"> • New signage has been added to West Suffolk House, Mildenhall Hub and Haverhill House. In addition, an intranet post was published in January 2024 to inform staff on correct recycling practices. The waste and recycling intranet page has also been updated. • The decarbonisation fund has been used to install a variety of energy saving measures across the council’s estate including Air Source Heat Pump (ASHP), low energy hand dryers and LED lighting. In June 2024, ASHP and PV were installed at 6 Aspal Way, Beck Row.
<p>Environment and biodiversity</p>	<ul style="list-style-type: none"> • Secured £27,000 from the Local Authority Treescape Fund to plant 112 semi-mature heavy standard trees. The grant funding also covers three years’ worth of watering and aftercare. • Completed projects include: <ul style="list-style-type: none"> ○ Bridge and Access Project in Newmarket. ○ Stripped and replanted the Trevor Hagger Gardens in Mildenhall, with certain amenity greens also enhanced. ○ Landscaping work in Rought Avenue, Brandon as well as work to improve access by the Lake in Brandon County Park.

3. **Potential new actions**

3.1 As work has progressed against the action plan, new opportunities or areas for development have been identified by the Environment and Sustainability Reference Group (ESRG). Some of these actions will support the wider reduction in emissions across West Suffolk, while others focus on the council’s own operations and emissions and will contribute to the accelerating carbon reduction to meet the trajectory to net zero. Listed below are suggested new actions it is recommended are included in the Action Plan.

3.2 **Communities and communications**

NEW ACTION: Funding monitoring process - Establish a process to collate and monitor internal and external funding that supports climate change or environmental initiatives.

NEW ACTION: Green taxi fleet - Review emission requirements as part of the wider evaluation of the taxi policy.

3.3 **Corporate action**

NEW ACTION: Fully scope potential process to phase out council usage of gas, considering financial needs and timescales.

NEW ACTION: Develop a business case to end the use of Combined Heat and Power plant (CHPs) in all council leisure centres to be ready for the first of the current contract end dates in 2028 and/or align with the current refurbishment project for Bury Leisure Centre.

NEW ACTION: Explore costs, opportunities, and implications for a mixed freighter fleet.

3.4 **Environment and biodiversity**

NEW ACTION: Scope project focused on cleaner waterways - Working in partnership with local groups to consider ways to ensure waterways are clean and free of waste.

3.5 **Housing**

NEW ACTION: Ensure that all decisions are underpinned by evidence and performance measures are put in place. Make good use of data sources including from Suffolk Office of Data Analytics' Environment and Housing reports.

NEW ACTION: Scope methods to better utilise data to support the improvement and retrofit of current homes and buildings in West Suffolk.

3.6 **Planning and regulation**

NEW ACTION: Scope and explore opportunities to require more stringent building standards than the national standard to ensure efficient buildings in advance of next local plan.

NEW ACTION: Scope and explore more efficient land usage – specifically investigate the possibility of building higher in order to maximise efficiency of space in building.

NEW ACTION: Look to develop and adopt Climate Adaptation Plans to ensure that new buildings are able to deal with the effects of climate change – such as flooding.

NEW ACTION: Review planning approaches related to active travel, including consideration of pedestrianisation of some town centre areas and developing existing links between WSC and Suffolk County Council, as the authority responsible for highways and public transport.

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

- 4.1 There is no “do nothing” option. The ESRG members are all aware of national and international reports and events, in particular the reports of the [Climate Change Committee \(theccc.org.uk\)](https://theccc.org.uk).

5. **Consultation and engagement undertaken**

- 5.1 The ESRG has not undertaken business or community engagement.

6. Risks associated with the proposals

- 6.1 There is an ongoing risk that the resources required to implement the actions will not be available. However, this risk will be monitored by the Environment Management Group, with any opportunities for securing external resources monitored and pursued as appropriate, and Cabinet advised of any serious delays in implementation or resource requirements.

7. Implications arising from the proposals

- 7.1 Financial - There are no specific financial implications arising from this report. Where individual projects require investment, this will be a separate report.
- 7.2 Legal compliance- No implications
- 7.3 Personal data processing – No implication.
- 7.4 Equalities - The working group expect that equality impacts should be positive as a result of their work, however this would need to be subject to further assessment based on each action.
- 7.5 Crime and disorder – No implications
- 7.6 Safeguarding – No implications
- 7.7 Environment or sustainability - The recommendations will have a positive impact on the environment.
- 7.8 HR or staffing - No implications from this report; further activity may require additional staff to support, and this will be subject to business cases or separate requests.
- 7.9 Changes to existing policies – No implications
- 7.10 External organisations (such as businesses, community groups) - The working group's recommendations specifically state potential partner organisations that will need to be involved with implementing recommendations. Officers maintain a dialogue with partner organisations.

8. Appendices referenced in this report


- 8.1 Appendix A – Environment and Climate Change Action Plan Update
- 8.2 Appendix B – Environmental Statement 2023-2024


9. Background documents associated with this report

- 9.1 14 January 2020 Cabinet Report number: [CAB/WS/20/009](#)


- 9.2 21 July 2020 Cabinet Report number: [CAB/WS/20/045](#)
- 9.3 20 July 2021 Cabinet Report number: [CAB/WS/21/032](#)
- 9.4 19 July 2022 Cabinet Report number: [CAB/WS/22/040](#)
- 9.5 19 September 2023 Cabinet Report number: [CAB/WS/23/039](#)

Appendix A – Environment and Climate Change Action Plan Update


Workstream	Strategic Action	Task	Update
Biodiversity	1.1 External funding	Look for outside opportunities for grant funding or other support.	<p>ONGOING: Utilising grant money on the Rural England Prosperity Fund projects we've agreed with partners:</p> <p>Newmarket – This year's bridge and access project complete.</p>  <p>Mildenhall – The Trevor Hagger Gardens has been stripped and replanted. Certain amenity greens have been enhanced.</p> <p>Brandon - Landscaping work in Rought Avenue, proposed to the town council, as well as work to improve access by the Lake in Brandon County Park has been completed.</p> <p>Haverhill – Four amenity areas were proposed for environmental improvements and work is completed.</p>
		Seek external funding to help maintain and increase tree cover in West Suffolk Council managed areas.	<p>ONGOING: In October 2023, the council sent in an application to the Local Authority Treescape Fund (LATF) and was granted £27,000. By January 2024, 112 semi-mature heavy standard trees were planted using this grant. The grant funding also covers three years' worth of watering and aftercare.</p> <p>We also assisted the Woodland's Trust annual tree donation scheme hosted at Nowton Country Park on the 22-23 November 2023. See link and acknowledgement on the Suffolk Tree wardens web page.</p>
	1.2 Biodiversity & Environment Parks and Green Spaces	With regards our Green Flag (GF) sites we will identify improvements on the previous judges scores.	<p>ONGOING: Surveys undertaken in October 2023 at College Heath Road found that the plant, <i>Artemisia Campestris</i>, have increased from 41 plants in 2019 to 416 plants at the site. This will give the rare Wormwood Moonshiner beetles, that eat the seeds of Field Wormwood, a much bigger food resource.</p> <p>The Green Flag management plans and associated action plans have been reviewed and updated following last year's judgments. A number of actions have been progressed including:</p>

Workstream	Strategic Action	Task	Update
			<ul style="list-style-type: none"> The Carpark at West Stow has been resurfaced and drainage installed. The signage or interpretation material at Aspal Close has been updated and renewed. Abbey Gardens – we have increased the site’s biodiversity by planting around the central bedding area and introducing a new spring bulb planted area. We’ve also mulched the shrub beds on site to suppress the weed growth rather than using herbicide. <p>Submissions to Green Flags have again been made, and inspections have been undertaken from May 2024. Results expected in September.</p>
		Encourage responsible use of green spaces - through better information.	<p>ONGOING: Aspal Close Nature Reserve has been focused on this year. In October 2023, an audit was undertaken of the existing signage at Aspal Close and a quote obtained for the production of new signage. This signage was produced and installed in May 2024, in time for Green Flag visit.</p>  <p>The replacement of old signage is an ongoing programme. We will be carrying out audits on priority sites this summer for replacement in the next financial year. The sites are still being finalised.</p>
	1.3 Biodiversity & Environment Parks and Green Spaces	Review the maintenance regimes of grass areas owned by the council in order to increase biodiversity.	<p>ONGOING: In January 2024, a landscape review was produced and conducted alongside Parish and Town Councils. The key outcomes from the review were that there has been public dissatisfaction in the way the public realm has been managed. As such, we have redirected efforts to ensure more of a balance between the aesthetic and environmental considerations.</p> <p>New machinery purchased and new staff recruited for grass cutting. The new equipment purchased is: Toro LT-F3000 Triple Flail Mower (Landscapes team) John Deere 997 Zero Turn Mower (Landscapes team) John Deere 1580 Front Rotary Mower (Landscapes team) 2 x Hayter Harrier battery powered mowers (Abbey Gardens)</p> <p>A comprehensive review of Ground Maintenance took place see link: Review-of-WSC-Grounds-Maintenance-Operations.pdf (westsuffolk.gov.uk). The new grass cutting equipment enables us to maintain a wider range of grass management</p>

Workstream	Strategic Action	Task	Update
			regimes including those more favourable for enhancing conservation and biodiversity.
		For those sites not subject to Green Flag scrutiny we will progress the recommendations made in the SWT phase one habit surveys for the public open spaces surveyed in 2018.	<p>ONGOING: Between September and December 2023, scything and meadow cutting work was undertaken in the Great Churchyard, Nowton Park and East Town Park. By January 2024, conservation work was completed at No Mans Meadow Bury St Edmunds by the Bury Water Meadows Group.</p> <p>Citizen science - The Lark has also been selected as the Suffolk river to be part of the national citizen science project for water quality. This is a very exciting initiative where the Lark and the work of the River Lark Catchment Partnership is up with the best in England on its citizen science work.</p>
		Investigate and develop business cases for grounds maintenance equipment renewal with green equipment.	<p>ONGOING: One of the outcomes of the Grounds Maintenance review was that we were able to bring forward the replacement of some of our older equipment sooner. This new equipment is more efficient.</p> <p>East Town Park have purchased a new Stihl RMA 765v battery powered cut and collect mower in October 2023, and Abbey Gardens purchased two electric powered Hayter lawnmowers in May 2024.</p>
	1.4 Partnerships	Work with local environment groups (for example, community groups) to improve environment and biodiversity at West Suffolk Council managed sites.	<p>ONGOING: Anglia in Bloom results are expected in July. Brandon in Bloom and Bury in Bloom are both a part of the competition.</p> <p>Over the course of the year, West Suffolk Council has continued to work with Bury Water Meadows Group and River Lark catchment Partnership.</p> <p>In March 2024, the River Lark Catchment Partnership was chosen to run a project on behalf of Anglian Water. The council is working with them on this, linking it into our work on the Chalk Streams Project.</p> <p>A Bioblitz event was held in the Abbey Gardens on 19 – 20 May. The event was arranged by the Bury Water Meadows Group and West Suffolk Hive. A variety of activities was undertaken during the two days including interactive walks, talks, school activities and entertainment.</p>

Workstream	Strategic Action	Task	Update
			 <p>Provisional results are: Spiders 9 different species inc cucumber green and nursery web Beetles 7 different species Moths 5 different species Bee 2 different species Fly 2 different species Snail 2 different species</p> <p>Unexpected finds were: 24 spot ladybird Dark bush cricket Common pill bug Migrant hoverfly</p> <p>NEW TASK: Scope project focused on cleaner waterways.</p> <p>Working in partnership with local groups to consider ways to ensure waterways are clean and free of waste.</p>
<p>Communities and Communications</p>	<p>2.1. Reduce public waste and improve recycling output.</p>	<p>Reduce the amount of waste that is created by public and businesses, such as food waste, through awareness raising campaigns across Suffolk.</p>	<p>ONGOING: Over the course of the year, the council has been involved in numerous national, regional and local campaigns, including:</p> <p>Suffolk School Skills Days in October 2023 – The team attended events in Haverhill, Newmarket and Bury St Edmunds. Teaching children about recycling and showing them around a bin collection lorry. October 2023 - Food Savvy (23 October -13 November 2023 for four weeks social media and advertising campaign. January - Buy Nothing New Month and 'Its better in the bank' refresher in January via social media. March - Food Waste Week (18 - 24 March 2024) April - Earth Day RAF Mildenhall (8 April) and Stop Food Waste Day (24 April) social media campaign. May - Compost Week, Brandon Country Park 'Shovel it' giveaway event (8 May).</p> <p>World Environment Day – 5th June</p>

Workstream	Strategic Action	Task	Update
			<p>Clean Air Day (20 June)</p> <p>The Great Big Green Week</p> <p>Plastic Free July (all month).</p>
		<p>Work to increase recycling through the use of blue bin and recycling sites in order to maximise the use of the current recycling systems in Suffolk.</p>	<p>ONGOING: By October 2023, analysis of the 'Shake it Out' campaign showed that it resulted in a reduction of prohibitive contamination by 2 per cent.</p> <p>Suffolk Waste Partnership (comms group) will be discussing ideas for a Suffolk-wide campaign for Autumn 2024, any campaign is limited due to pending changes to national recycling collection systems. The main idea for a new campaign is to personalise the service from the drivers/loaders collecting materials to those sorting the recycling materials at the processing plant.</p> <p>'Simpler Recycling' will make weekly household food waste collections and kerbside collections of glass/cartons compulsory from 31 March 2026. (Plastic films by 31 March 2027).</p>
		<p>Increase the quality of waste collected for recycling in response to commodity market requirements.</p>	<p>ONGOING: Efforts focused on the Foil Campaign (Alupro) to increase capture of foil being used and not recycled. The social media campaign was launched in March 2024 and ran for three weeks.</p> <p>Nationally contamination levels are increasing at Material Recycling Facilities (MRFs). In Suffolk, contamination levels remain at a consistent level and have declined in the last 12 months, bucking the national trend.</p> <p>Biffa (the MRF contractor) feel that the Suffolk Waste Partnership's consistent material quality levels are a credit to the work put into educational communications and collection crew stickering.</p>
		<p>Continue to promote anti-litter initiatives.</p>	<p>ONGOING: In March 2024, the Great British Spring Clean social media campaign was launched. The campaign engaged the public encouraging them to arrange their own litter picks. The results were mostly positive engagement – sharing with friends and groups. However, a few responses asked why this shouldn't be covered by council tax.</p> <p>In April 2024, the council carried out activity for Earth Day (22nd April). This work included social media posts, TikTok video, risk assessment, a litter pick at West Suffolk House (in which five members of staff took part).</p>

Workstream	Strategic Action	Task	Update
			
		<p>Influence and respond to the future government Recycling and Waste Strategy for England, to be implemented from 2023 onwards.</p>	<p>ONGOING: Suffolk Waste Partnership are planning for new collections proposals under 'Simpler Recycling' which is due to be implemented by 31 March 2026.</p> <p>A weekly food waste collection for householders will be introduced and changes will be made to existing recycling and potentially general waste collections.</p> <p>Food Waste - weekly collection in small caddies. Dry Recycling - comingled (all acceptable materials together) - twin stream (paper/card and plastics/tins/glass). General Waste - 2 or 3 weekly collections.</p>
		<p>Increase activity to promote waste and recycling campaigns to local businesses and residents.</p>	<p>ONGOING: Recycling week 16-22 October 2023, 'The Big Recycling Hunt' – national campaign.</p> <p>Glass Better in the Bank – campaign finished in January 2024. Feedback was received from the public, including comments about comparisons to Norfolk, Cambridgeshire, counties surrounding Suffolk, where glass can go in blue recycling bins there.</p> <p>Recycling week 14-20 October 2024 – national campaign.</p> <p>All packaging to be stamped 'Recycle' or 'Do Not Recycle' from 1 April 2027.</p>
<p>2.2 Environment and biodiversity awareness raising campaigns.</p>	<p>Provide a range of public events and awareness campaigns at Parks, with a Ranger presence, to promote green initiatives and to provide advice to residents on how to protect and enhance habitats within their neighbourhoods.</p>	<p>ONGOING: In March 2024, the council engaged in International Compost Week. Communications led to increased turnout, with positive engagement on social media and at the event.</p> <p>The council also took part in a Green Careers Fair, which was promoted through social media.</p>	

Workstream	Strategic Action	Task	Update
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Activities and promotions are planned for National Allotments Week, 12-18 August 2024.

On 8 May, the council ran a free compost giveaway event at Brandon Country Park. This event is held annually; however, this was the best attended on record – with many event goers stating that the council’s promotion was key to attendance.



Promote local food production.

ONGOING:
The council has undertaken various activities to promote community and household food production including Food Savvy Suffolk – the council regularly shares posts on the council Facebook page.

We have incorporated a focus on locally grown produce when promoting West Suffolk markets.

Workstream	Strategic Action	Task	Update
			Through locality budgets, councillors have supported Still Good Food in Bury St Edmunds
	2.3 Travel & Transport Partnership Working.	Work with Suffolk County Council to ensure West Suffolk benefits from the Cycling and Walking Fund.	ONGOING: The Anti-Idling Campaign was launched in February 2024. This received a number of comments asking about the validity of the advice (taken from Suffolk County Council promotional material), wanting improved/more transport networks, complaining about potholes and lengthy roadworks.
	2.4 Continue to work with partners and community groups to improve air quality.	Increase impetus on measures to tackle vehicle idling in sensitive locations.	ONGOING: In January 2024, the council renewed the Gt Barton Air Quality Action Plan, with a number of new actions, such as undertaking an infrastructure assessment to limit vehicle idling issues. Clean Air Day (20 June)
		Work with partners to promote improvement of Air quality by sharing information and positive work practices.	ONGOING: In October 2023, a joint Suffolk bid was submitted for DEFRA Air Quality Grant. However, DEFRA withdrew funding.
		Continue to support residents of West Suffolk to identify and develop community projects aimed at informing and promoting ways to improve air quality throughout the district.	ONGOING: The council has continued to work closely with Suffolk Climate Partnership. In the 2023-24 financial year, £9,485.80 (6 per cent of total fund) was allocated to Environment and Sustainability. Similarly, of the Community Chest (renamed Thriving communities Fund from this year) in 2024-2025, 3.5 per cent of total fund was allocated to projects with a focus on Environment and Sustainability. Of which 100 per cent was for projects aimed to reduce food waste
	2.5 Promote domestic renewable energy technologies, initially focusing on solar PV and Air Source Heat Pumps.	Promote domestic renewable energy technologies, initially focusing on solar PV and Air Source Heat Pumps.	ONGOING: From January 2024, the council began sending out social media updates on the Warm Homes initiative at least once per month. On 15 th February, a new video was produced by the council and launched focusing on energy efficiency retrofits for older properties in West Suffolk. On 6 th March, the council promoted a free Retrofit Solutions Conference to Suffolk residents, homeowners and built environment professionals. The conference focused on retrofit solutions designed to increase energy efficiency in older properties. From March 2024, the Decarbonisation Initiative Fund began providing support to Parish and Town councils to convert streetlights to LED. Mildenhall Town Council was the first to benefit from the scheme, with the council organising press releases and social media to promote the initiative. Over 1600 conversions have been funded through the Fund and will save around 200 tonnes of carbon dioxide a year.

Workstream	Strategic Action	Task	Update
	2.7 Improve Renewable Energy Portfolio.	Continue to invest in our Solar for Business scheme.	ONGOING: In 2023-2024, 2.5MW of new roof mounted solar were installed on 24 buildings in West Suffolk. This compares to the previous highest year of 1.3MW in 2022-2023. Roof mounted solar contributed £690,000 to council finances in 2023-2024, and carbon dioxide savings of 2.3 tonnes a year.
		Investigate opportunities to build and own another solar farm.	ONGOING: Currently monitoring the approval process for a 30 MW solar farm.
		Investigate opportunities for the development of renewable energy sources including wind and hydrogen.	ONGOING: Two council owned sites were investigated for a possible wind turbine but were unsuitable due to the proximity of nearby buildings. The council is monitoring the development of the hydrogen economy.
	2.8 Improve Public Electric Vehicle Charging.	Increase the provision of electric vehicle charging facilities on council-owned land.	ONGOING: Tender being prepared for Parkway (BSE) and Guineas (Newmarket) car parks – four 7kW sockets to be installed at each site. Multiple West Suffolk community sites put forward for installation under LEVI pilot funding – installations starting Autumn 2024. Tender currently open.
	2.9 Deposit returns scheme.	Pilot reverse vending machines.	ONGOING: Trovr Reverse Vending Machines set up in Bury St Edmunds and Newmarket from February 2024. The Machines are located in The Guineas and Leisure Centre in Newmarket; and West Suffolk College and the Parkway Multistorey Car park in Bury St Edmunds. The six-month trial runs out in August. An assessment will be carried out after completion. By June 2024, the reverse vending machines took in: Total: 5,956 items



Workstream	Strategic Action	Task	Update
	NEW ACTION: Funding monitoring process	Establish process to collate and monitor internal and external funding that supports climate change or environmental initiatives.	Develop administrative process to collate and to monitor internal and external funding streams that benefit the local environment or reduces carbon emissions. This will make it easier to promote the work of the council.
	NEW ACTION: Green taxi fleet	Review emission requirements as part of the wider evaluation of the taxi policy.	
Existing housing	3.1 By working with partners explore how they wish to improve the energy efficiency of homes.	Confirm the standard of build intended. Establish a measure against the standard.	ONGOING: West Suffolk Council will work with its Housing Company Barley Homes to meet the new enhanced local plan and building regulations, to support the ambition for the company to be an environmental exemplar, noting the requirement for it to operate commercially.
		Improve social housing	ONGOING: Over the course of 2023-2024, 151 homes, under Flagship, have been retrofitted. The council is primarily working through the Safe Suffolk Renters (SSR) project, which has an objective to improve living conditions and energy performance. While SSR is focused primarily on private rental, there will be an important social housing element. The project is due to be launched in the latter half of 2024.
		Funding programmes to support retrofit and housing improvement	ONGOING: West Suffolk Council has been able to make progress here via the HUG scheme. Over 2023-2024, the HUG scheme has delivered the following: <ul style="list-style-type: none"> • 10 properties completed. • 34 applications approved (works progressing) • 150 applications awaiting approval from contractors / awaiting start date. Total Investment £121,658. The council is working with partners, including Suffolk County Council, in seeking to improve both the reporting and delivery of these schemes.
		NEW TASK: Working with Suffolk partners, consider the development of a reporting system for Social Homes and Private Rented Sector (PRS)	This will make it easier to understand the challenges, the quality of the housing in the area, and in engaging with households.
	3.2. Improve housing through funding and regulation	Establish regular monitoring of performance. Number of rented homes identified against those brought up to standard.	COMPLETE: Required data was added to KPI dashboard in October 2023.
		Support Suffolk-wide projects to improve Private Rented housing.	ONGOING: By March 2024, the Stock Conditions survey has been completed by Suffolk County Council and a report for West Suffolk received. The council is also working through the Safe Suffolk Renters (SSR) project, which has an objective to improve living conditions and energy performance.
	Improve sign-posting to funding.	ONGOING:	

Workstream	Strategic Action	Task	Update
			<p>In October 2023, the council linked in with Suffolk-partners around a communications plan.</p> <p>The council will now look into making alteration to the council website to properly sign-post relevant funding information.</p>
		Explore options for housing improvement (retrofit) in upcoming Housing Strategy.	<p>ONGOING: The proposed Housing Strategy includes housing improvement commitments that includes retrofit: "Continue bids for funding from the Government and others to reduce emissions across all housing markets and to deliver improvements in energy efficiency particularly focusing on low-income households and vulnerable residents, working with partners across Suffolk."</p> <p>The Housing Strategy is due to be agreed in September 2024.</p>
		Housing improvement loans scheme.	<p>ONGOING: A scoping report on local housing funding schemes was delivered in January 2024.</p> <p>We will promote Suffolk wide interest free loan scheme when it comes online later this year.</p>
	NEW ACTION: Data collection and usage	Ensure that all decisions are underpinned by evidence and performance measures are put in place.	<p>Make good use of data sources including from Suffolk Office of Data Analytics' Environment and Housing reports.</p> <p>In the latter half of 2024, by overlapping this data with other location-based data, the council is working with SCC to develop a model to aid in locating, prioritising, and targeting resource for retrofit schemes.</p>
		Scope methods to better utilise data.	Scope methods to better utilise data to support the improvement and retrofit of current homes and buildings in West Suffolk.
Planning and regulation	4.1. Maximise application of planning policy to encourage higher performance in new build.	Develop the climate emergency and sustainable development strategic policy for the new local plan.	<p>ONGOING: Draft submission local plan considered and approved by Cabinet, 5 December 2023. The final consultation complete and submission made to the Secretary of State. Currently awaiting response in relation to the examination stage.</p>
		Promote PAN to officers and developers. Monitor usage, evaluate and seek feedback.	<p>COMPLETE: PAN paper is completed, and monitoring is ongoing.</p>
		Develop a checklist to accompany planning applications.	<p>ONGOING: The final list is being reviewed to ensure all necessary Biodiversity Net-Gain requirements are included. All local validation lists will be finalised, and a consultation will be used to confirm their usage over the summer.</p>
		NEW TASK: Continue to explore and monitor opportunities to require more stringent building standards than the national standard to ensure efficient buildings in advance of next local plan.	<p>ONGOING: The matter of whether more stringent requirements can be asked for in planning policy is currently being considered by the courts. Officers are continuing to monitor the outcome of this case and this matter will play out for West Suffolk's plan through the Examination in Public. A more appropriate task</p>

Workstream	Strategic Action	Task	Update
			relating to land use planning would be to produce a supplementary planning document or additional technical guidance to support and encourage the delivery of sustainable homes. This could be through partnership working with developers and other stakeholders.
	4.2. Through the local plan process, address the challenge of protecting and enhancing biodiversity while providing growth.	On a continuing basis, ensure the skills in the Planning team are up to date in respect of natural capital, ecosystem services and in particular Green Infrastructure (GI) and Biodiversity Net-Gain (BNG).	ONGOING: Planning team undertakes regular training as required. In December 2023, guidance notes for Biodiversity Net-Gain were published by Government and reviewed by the team. Mandatory BNG is now in force and training is ongoing for officers. We will continue to monitor the impacts of the new requirements in terms of resourcing.
Review resources necessary to monitor adherence with planning policy and permissions to ensure agreed biodiversity and landscape improvements are implemented.		ONGOING: In 2023, the planning team noted that there was an ongoing issue with resource in terms of Ecology and Landscape advice. Following review, the Planning team will recruit a new Ecologist post over the summer 2024 from within approved budgets.	
Work with partners and developers to encourage sustainable tree retention and increase canopy cover.		ONGOING: In October 2023, officers attended an event with Suffolk County Council to look at street designed by principles in practice. The emerging Local Plan includes tree planting and increasing canopy cover.	
NEW ACTION: Land usage	Scope and explore more efficient land usage – specifically investigate the possibility of building higher in order to maximise efficiency of space in building.	ONGOING: The emerging local plan allocates land for development and has considered density and best use of land. More detailed work would be carried out on a site-by-site basis through a Masterplan process and through pre-app discussions, taking into account local context and other planning policies. In addition, Design Code work could include an assessment of density and building heights across the district, which is being looked into by the Planning Policy Team.	
NEW ACTION: Climate Adaption Plans	Look to develop and adopt Climate Adaptation Plans to ensure that new buildings are able to deal with the effects of climate change – such as flooding and its cumulative impact.	ONGOING: The emerging local plan includes policies relating to climate change adaptations. Officers will continue to monitor progress through the examination considering any new government policy which might emerge on this.	
NEW ACTION: Facilitate and improve active travel.	Continue to develop planning approaches related to active travel.	Statutory processes for planning and transport, including town centre masterplans, are key to promoting active travel in towns, as any changes need to be approved through the planning process. Expectations for this action will initially include: <ul style="list-style-type: none"> • Support and contribute to SCC local cycling and walking infrastructure plan in Autumn 2024. • Work with SCC to map existing network and planned improvements to walking and cycling infrastructure across the district. Developing existing links between WSC and Suffolk County Council, as the authority responsible for highways and public transport, will be key to this. The	


Workstream	Strategic Action	Task	Update
			annual report could also provide updates on existing proposals for towns in the area, including consideration of pedestrianisation of some town centre areas.
Corporate action	5.1. Environmental management systems	Review environmental management system in March every year to ensure completeness.	ONGOING: Review to commence in March and April during Environmental Statement data collection phase. All alterations or improvements are included in the notes section of the Environmental Statement.
		Work with all building users to reduce paper consumption by 5 per cent each year, to be measured in March.	ONGOING: Environmental Statement includes figures on paper usage. Over the course of 2023-2024, work has been undertaken to encourage councillors to be more digital and the Planning Development team have moved away from sending neighbourhood letters and encouraged to focus on online data. Across all buildings, the council has also removed four printers assessed to be unnecessary.
		Work with HR (and possibly SCC) to update the WSH green travel plan.	ONGOING: By January 2024, a staff survey had been undertaken and its results analysed. A list of tasks was developed from the survey analysis. Key areas of work are infrastructure, communications and incentives. This includes initially ordering two manual bikes from Temple, re-lining the car share section of Olding Road car park, and promoting green travel to workdays, which will take place in the latter half of 2024. The council will also refresh the Travel Plan for West Suffolk House during the second half of 2024 – supported by an online and interactive resource.
	5.3 Internal reporting.	Create a central register for grants or financial awards for environmental works.	ONGOING: In March 2024, the council set up a central folder tracking grants and financial awards for environmental works – this is mostly focused on climate change, carbon reduction. However, more needs to be done to incorporate environment and biodiversity, and this work is ongoing.
	5.5 Reduce energy consumption from all sites.	Reduce energy consumption from all sites.	ONGOING: The decarbonisation fund has been used to install a variety of energy saving measures across the council's estate including Air Source Heat Pump (ASHP), low energy hand dryers and LED lighting. In June 2024, ASHP & PV were installed at 6 Aspal Way. For year 2023-24, the council has emissions standing at 4,979tCO ₂ e against the target budgets to be achieved 2028 of 2,484tCO ₂ e to maintain trajectory to net zero. The data shows that a key contributor to the increase in emissions is from the council's leisure operations delivered by Abbeycroft Leisure. There has been a 0.5 per cent decrease in emissions from council activity and a 4.6 per cent increase in emissions from Abbeycroft Leisure compared to 2022-23. A review of all leisure centres is currently underway to identify building improvements that will address emissions. The council had identified a range of improvements and made an application to the Government's swimming pool fund in 2023-24

Workstream	Strategic Action	Task	Update
			but was only awarded £35,000 to deliver some filtration improvements. Proposals will be brought forward as part of the council's Net Zero investment fund.
		NEW TASK: Scope the process to take council buildings off gas.	<p>The Apex and West Suffolk House will be taken off gas by 2026. Also by March 2026, we will seek to commission and receive the external advice needed to scope the process to phase out council usage of gas from all council buildings considering financial needs and timescales.</p> <p>The council's default position on new buildings and boiler replacements will be to ensure that they run on electric, rather than gas i.e. the case will have to be made to use gas rather than vice-versa.</p>
		NEW TASK: Develop a business case to end the use of Combined Heat and Power (CHPs) in all council leisure centres to be ready for the first of the current contract end dates in 2028 and/or align with the current refurbishment project for Bury Leisure Centre.	Develop a business case setting out cost, implications and carbon impact and what changes would be needed to the Net Zero Investment Fund to achieve this outcome.
	5.6. Continued professional development of driving staff	Consider using a driving efficiency metric within drivers PDRs to encourage more fuel efficient and safe driving.	<p>ONGOING: New monitoring system introduced in March 2023 continues to be monitored, and some driving events are being highlighted to drivers on an ongoing basis. This will be expanded as more trucks have the same technology upon replacement.</p> <p>We will also explore an investment in a trial of additional telemetry in a couple of HGVs that could enable further fuel savings. Depending on the outcome this could be expanded to other vehicles/ parts of the fleet.</p> <p>Route optimisation is carried out regularly to ensure that routes are efficient and minimise carbon emissions.</p>
		Continued professional development of driving staff.	<p>ONGOING: Driver CPC training is carried out annually. Training is mandatory for Vocational drivers. 35 hours of training must be undertaken over five years that can be split into 5 x 7 hour modules. Training is ongoing yearly. All modules are JAUPT approved, and we endeavour to select modules that are interesting and engaging to our driving staff.</p> <p>The driver CPC training will take place in June and July 2024.</p>
	5.7. Alternative fuel vehicles	Review of alternative fuel vehicles as part of vehicle procurement process.	CLOSED: After lengthy deliberations regarding HVO a decision was made to suspend any switch to HVO as it is not viable.
	5.8. Fleet Management ensure that council invests in appropriate ULEV.	Require all who request new fleet vehicles to review their needs. The default position is now ULEV and a case must be made if ICE is required.	ONGOING: The council is making decisions to replace diesel or petrol vehicles with EV alternatives, wherever viable. As with our buildings, the default position initially explored is electric, and a case has to be made to retain petrol or diesel.

Workstream	Strategic Action	Task	Update
			<p>For this reason, the wording of this task has been updated in this version of the plan.</p> <p>Across 2023-2024, this action has progressed and has included: The Play Area Inspector took delivery of new EV Nissan Townstar in February 2024. The vehicle charges at West Suffolk Operational Hub overnight in staff car park.</p> <p>From April 2024, a Pilot Scheme was launched to look at installing chargers into two homes of property services staff to enable overnight charging. There is potential to expand this scheme to other van users if the project is successful.</p> <p>Through 2024-2025, we will now be looking at the business case for accelerating the conversion of other parts of the fleet (see also new task below).</p>
		Continued trials of alternative technologies for commercial vehicles, such as Road Sweepers.	ONGOING: The council took delivery of second EV precinct sweeper, which is based in Bury St Edmunds Area – the sweeper has EV graphics identical to our previous Haverhill machine.
		Explore options for using EVs within the [Vertas] pool car service and ensure that the number of vehicles is suitable to meet service demand.	ONGOING: Three EV pool cars based at West Suffolk House Vertas are ready - charging access has also been confirmed with supplier. Communications have been drafted to help promote service once launched.
		EV charging at depots.	ONGOING: Electrical upgrades at West Suffolk Operational Hub were completed in March 2024. The new supplier, Joju Limited, was selected in April 2024 to provide new charging infrastructure. Installations have started at depots.
		NEW TASK: Explore costs, opportunities, and implications for a mixed freighter fleet.	Investigation to include EV waste freighter(s) to cover town collection route(s), recognising limitations of technology in longer rural routes.
	5.9. Continue to work with Facilities Maintenance provider (VERSE) to ensure that in Cafes and Kiosks: 1. Single use plastics is minimalised or not used at all. 2. That they provide tap water free on request and advertise this service. 3. Products are locally sources where possible and food choices promote sustainability.	West Stow Visitor Centre – Engage with café operator and ask them to introduce waste management actions with staff.	ONGOING: Everything is plastic free apart from bottled water at Brandon County Park due to the environmental area and customers wanting a screw top. Over the next year, alternatives will be investigated, though these will likely be more expensive and could potentially put off customers. However, Brandon County Park has a water fountain on the outside of the café, which is readily used by visitors for refilling their own water vessel. Everything else within the offer is biodegradable or recyclable as per all Vertas sites. Tap water is available and given out upon request in both Café West and Brandon County Park – and a new sign being created to advertise this.

Workstream	Strategic Action	Task	Update
			Products are procured by the Vertas head office team, and pride is taken in using local suppliers wherever practicable. Greater use of more local suppliers at Endeavour House will be investigated.
	5.10. Install renewable energy systems when replacing or maintaining West Suffolk Council assets.	Install renewable energy systems when replacing or maintaining West Suffolk Council assets.	<p>ONGOING: In October 2023, following site visit with consultants a quote has been received for designing a new Ground Source Heat Pump heating system for West Suffolk House. Due to prohibitive costings, we are pursuing an alternative designer.</p> <p>In June 2024, the tender process for the Mildenhall Hub PV canopies was completed and evaluation of the tenders has commenced.</p>

Completed Tasks

Workstream	Strategic Action	Task	Completed Task Update
Biodiversity	External funding	Look for outside opportunities for grant funding or other support.	<p>COMPLETED: Newmarket – This year’s bridge and access project complete.</p>  <p>Mildenhall – The Trevor Hagger Gardens has been stripped and replanted. Certain amenity greens have been enhanced. Brandon - Landscaping work in Rought Avenue, proposed to the town council, as well as work to improve access by the Lake in Brandon County Park has been completed. Haverhill – Four amenity areas were proposed for environmental improvements and work is completed.</p>

Workstream	Strategic Action	Task	Completed Task Update
Communities & Communications	Travel & Transport Partnership Working.	Support Suffolk-wide air quality monitoring pilot with a view to finding opportunities to improve air quality in hotspot areas and gain greater insight into particulate pollution.	COMPLETE NZIP analysed PM data in Bury St Edmunds and found no links with traffic. High levels were linked to Saharan dust and Bonfire night. The report, and a guide to air quality planning conditions, have been shared nationally with Air Quality officers.
	Raise Awareness and promote actions taken by WSC and Communities.	Create communications plan.	COMPLETE New Communications Planner developed internally and promoted among relevant staff.
Existing Housing	By working with partners explore how they wish to improve the energy efficiency of homes.	Establish the commitment to Decent Home Standard (DHS) or higher energy performance homes.	COMPLETE While not all properties are yet up to specification, the council has made a commitment to meet the DHS standard and to improve properties that West Suffolk Council is responsible for.
Planning and Regulation	Through the local plan process, address the challenge of protecting and enhancing biodiversity while providing growth.	Investigate and develop a new local plan tree strategy.	COMPLETE By December 2023, a new tree strategy and green infrastructure policies were developed and submitted to the Local Plan.
Corporate action	Environmental management systems	Introduce new measures to the council's quarterly performance report.	COMPLETE New water KPI added to corporate performance monitoring in October 2023. Business travel is already included.
	Learning from COVID - Encourage all council teams to consider and review their ways of working.	Seek to increase office recycling provision supported with clear signage and comms in place for September 2023.	COMPLETE New signage has been added to West Suffolk House, Mildenhall Hub and Haverhill House. In addition, an intranet post was published in January 2024 to inform staff on correct recycling practices. The waste and recycling intranet page has also been updated.
		Include reference and link to net zero ambition in job adverts for new staff. Have this in place for all posts by August 2023.	COMPLETE Relevant job adverts now include references to net zero and climate scorecard success. The West Suffolk Council recruitment website has also been updated with references to the council's climate commitments and recent climate score card results.
		Ensure that environmental impacts are considered when making key decisions from September 2023.	COMPLETE By January 2024, committee report papers were amended to bolster the environmental section, at the recommendation of the ESWG.
Environmental management systems.	Introduce a suitable water consumption metric to compare building performance.	COMPLETE Water consumption is now reported on within the councils key KPIs including top consuming sites or league table.	

Workstream	Strategic Action	Task	Completed Task Update
		Ensure that Cafe West are disposing of waste in most sustainable way.	COMPLETE By early 2024, Verse use recycling, food waste bins and glass recycling the same as the rest of the building.

1. Introduction

This report is a summary of the environmental impact from the activities West Suffolk Council (WSC) undertook to manage and reduce its carbon emissions during the year ending 31 March 2024.

After the declaration of an Environment and Biodiversity Emergency in West Suffolk in September 2019, West Suffolk Council launched an Environment and Climate Change Task Force to evaluate current progress and develop new avenues to help reduce greenhouse gas emissions in line with current aspirations. The Task Force's recommendations were confirmed by Cabinet and West Suffolk Council agreed a Net Zero Emissions by 2030 target with carbon budgeting periods agreed to measure performance towards this target – see Table 1. The Environmental Management Group has taken the outcomes of the task force and developed an action plan to achieve them. The Environmental Management Group has cross council membership with progress also included in the annual report. A high level summary of the council's commitments can be found in the [Environmental Policy Statement](#).

Table 1 shows the carbon budget periods set out in West Suffolk Council's Environment and Climate Emergency Declaration

Budget period	Period	Annual emissions at end of period	Emissions budget for the period
First	April 2020 to Mar 2023	4,675 tCO ₂ e per year	18,700 tCO ₂ e
Second	April 2023 to Mar 2026	2,484 tCO ₂ e per year	8,292 tCO ₂ e
Third	April 2026 to Mar 2030	840 tCO ₂ e per year	2,520 tCO ₂ e
Fourth	2030-31	Net zero emissions	

This statement focuses on the council's own emissions. There is also a significant amount of work which contributes to improving the environment across the district which is not covered in this statement. This work is carried out both by the council directly and in conjunction with partners. More information can be found on the council's webpage [tackling climate change](#).

The methodology used to write this report is based on the Government's [Streamlined Energy and Carbon Reporting \(SECR\)](#) requirements. The council is not obliged to report under these regulations but reports on a voluntary basis. A breakdown of reporting scopes and details of any estimated data is included in Appendix 2.

Overview of environmental performance during 2023-24

Total emissions figures include West Suffolk Council and Abbeycroft Leisure.

Total emissions down 39% compared to 2010 baseline.
Total emissions up 1.3% compared to 2022-23.

The below summary figures are for West Suffolk Council only.

Renewable energy generated up 183% compared to 2012 baseline.
Renewable energy generated up 20% compared to 2022-23.

Gas consumption up 5% compared to 2019-20 baseline.
Gas consumption down 28% compared to 2022-23.

Grid electricity consumption up 28% compared to 2019-20 baseline.
Grid electricity consumption up 13% compared to 2022-23.

Total owned vehicle emissions down 12% compared to 2019-20 baseline.
Total owned vehicle emissions down 3% compared to 2022-23.

Business travel down 66% compared to 2010 baseline.
Business travel up 1% compared to 2022-23.

Total water consumption up 32% compared to baseline.
Total water consumption up 3% compared to 2022-23.

Total West Suffolk House waste down 66% compared to 2012 baseline.
The recycling rate 73%, down 5% compared to 2022-23.
Total West Suffolk House waste down 17% compared to 2022-23.

6 Green Flags retained - Abbey Gardens, East Town Park, Brandon Country Park, Aspal Close & West Stow Country Park, Nowton Park.

Public electric vehicle (EV) chargers installed by WSC can support 70 EVs charging at the same time.
Energy delivered to drivers powered 421,490 miles.

136 trees and 705 whips planted during 2023-24.

Office printing down 66% compared to 2019 baseline.
Office printing down 1% compared to 2022-23.

Greenhouse gas emissions arising from West Suffolk Council activities

Target: Reduce greenhouse gas emissions from West Suffolk Council activity to net zero by 2030. Measured in Carbon Dioxide equivalent (CO₂e).

West Suffolk Council and Abbeycroft Leisure	
Baseline emissions 2010	8,215 tonnes CO ₂ e
Annual emissions in 2023-24	4,979 tonnes CO ₂ e

Carbon Dioxide equivalent (tCO₂e) is a unit of measurement used to indicate the global warming potential of a greenhouse gas, expressed in terms of the global warming potential of one unit of Carbon Dioxide. It is used to evaluate the releasing (or avoiding releasing) of different greenhouse gases against a common basis.

We include emissions that arise from buildings and transportation. This includes the leisure centres operated by Abbeycroft Leisure (ACL) and other operational buildings such as the Apex; it also includes buildings that we purchase energy for but excludes buildings that we own and are leased to local businesses who pay their own energy bills. The figures do not include the staff commuting journeys to our sites.

Total emissions are up 1.3 per cent compared to 2022-23 - see Figure 1 below. There has been a 0.5 per cent decrease in emissions from council activity and a 4.6 per cent increase in emissions from Abbeycroft Leisure compared to 2022-23 – see Figure 2 on the next page. Finally, Figure 3 shows a breakdown of total emissions by source.

Figure 1 – Combined greenhouse gas emissions by year

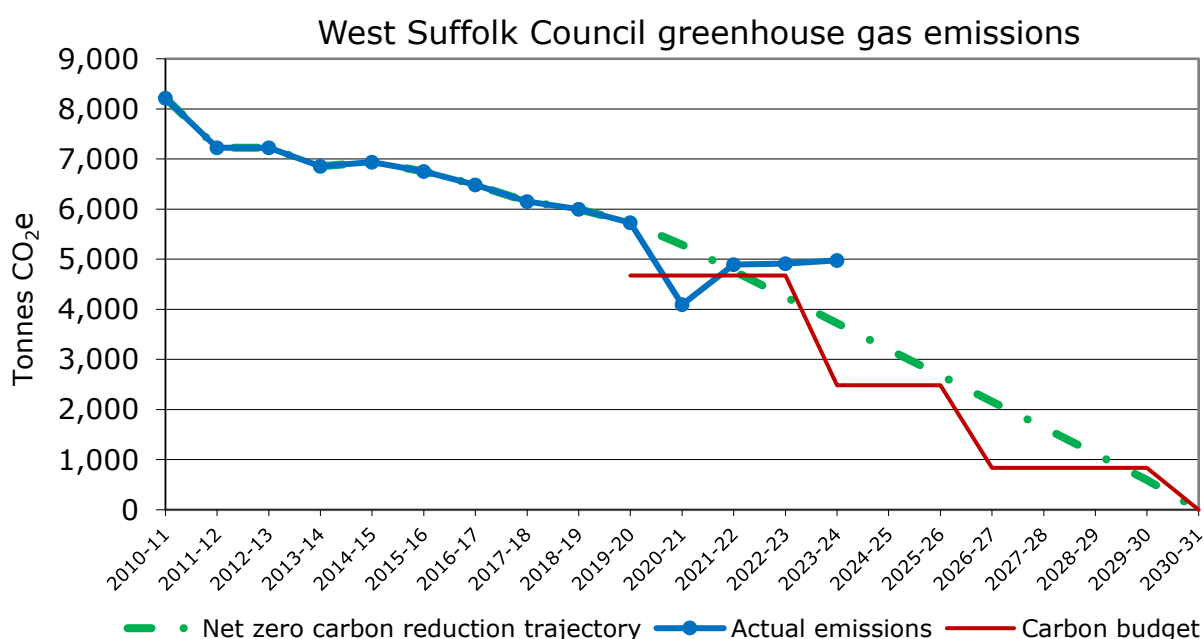


Figure 2 – Greenhouse gas emissions by organisation over time

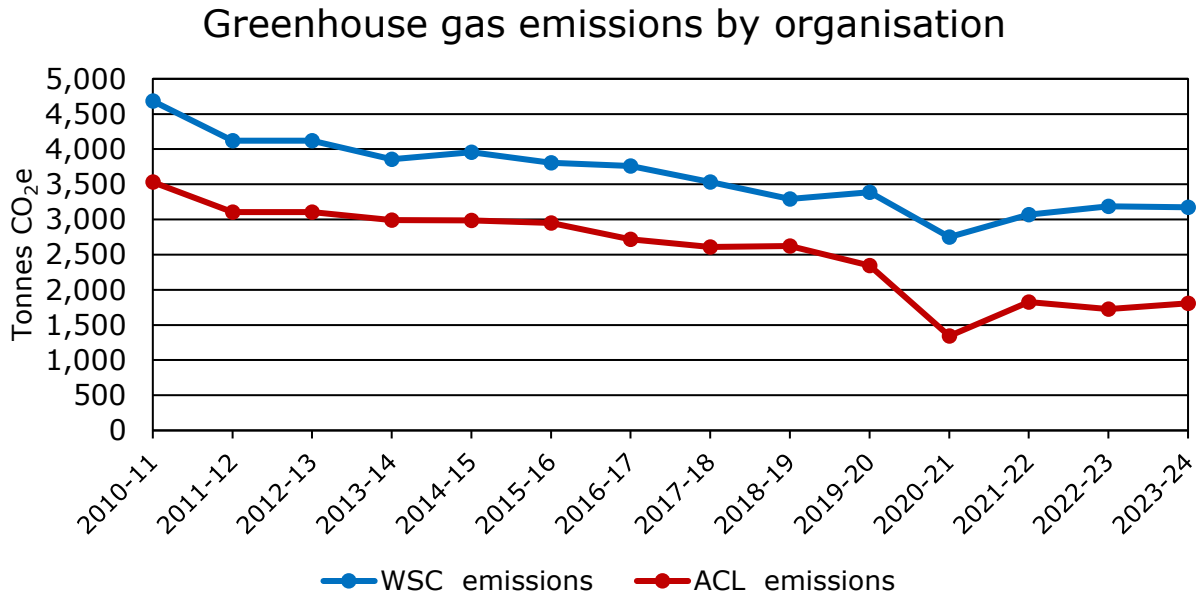
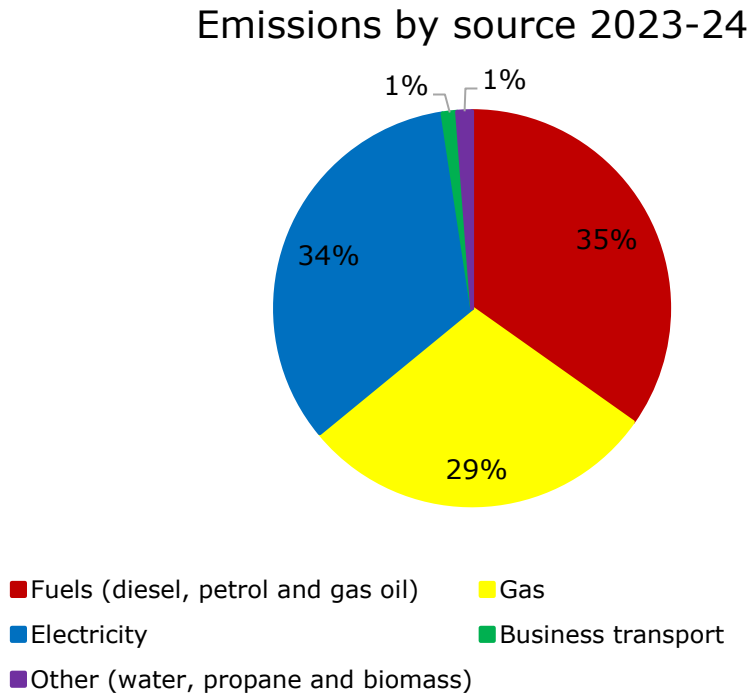


Figure 3 – Total greenhouse gas emissions by source



Notes

The long term ‘decarbonisation’ of grid electricity is a key component of the UK emissions reduction targets. Emissions arising from grid supplied electricity increased by 7 per cent in 2023 compared to 2022 data due to an increase in natural gas use in electricity generation and a decrease in renewable generation. The Appendix contains further information on reporting scopes.

2. Building energy use

Target: Meet the net zero emissions target we need to reduce energy consumption from buildings operated in 2019-20 by 50 per cent by 2025.

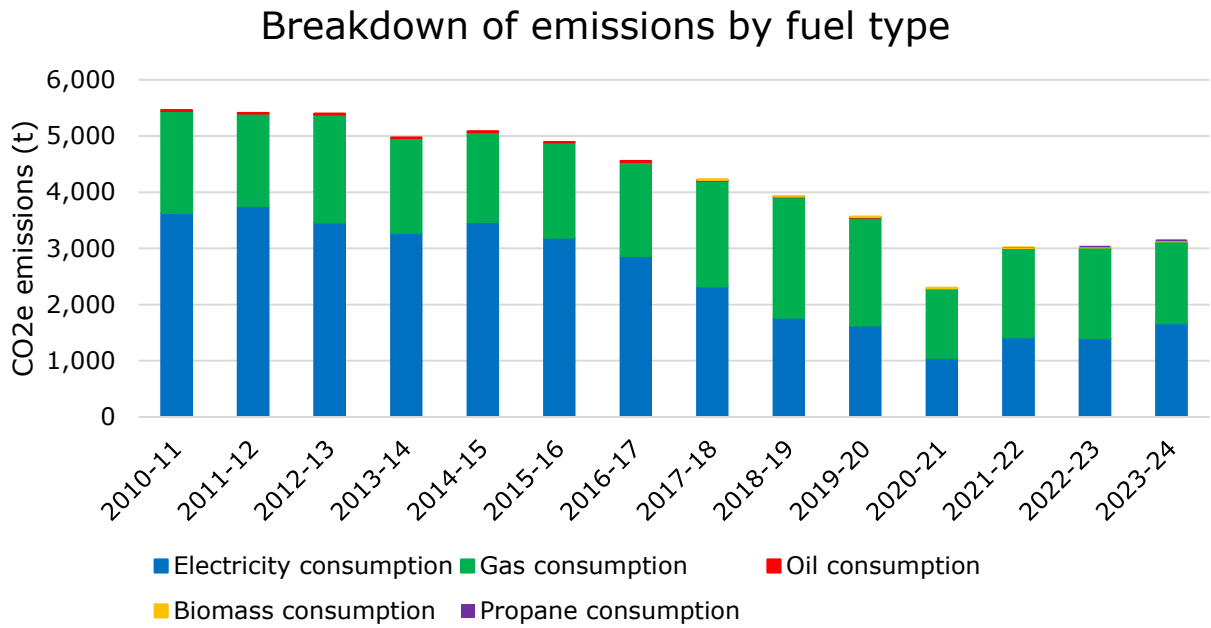
West Suffolk Council and Abbeycroft Leisure	
Emissions in 2010	5,436 tonnes CO ₂ e
Emissions in 2023-24	3,158 tonnes CO ₂ e

Emissions arising from all gas, electricity and biomass consumption are included in this section. Biomass is a fuel stock comprised of wood chips. Combined emissions from WSC and ACL buildings are increasing. In comparison to 2022-23, total emissions from buildings are up by 3.6 per cent, however, they are down 41.9 per cent compared to 2010. Figure 4 shows the overall decrease in emissions over time.

During 2022-23 and 2023-24, a significant investment has been made in building decarbonisation measures. Building improvements range from the 'quick wins' (for example, LED lighting upgrades and energy efficient hand driers) to more substantial investment (such as roof insulation and air source heat pumps). The buildings that have had improvements made are:

- The Apex
- The Avenue
- The Athenaeum
- Brandon country park bungalow and toilets
- Bury St Edmunds Bus Station
- East Town Park toilets
- Heldhaw Road Changing Rooms
- James Carter Road, Mildenhall
- Lake Avenue Housing
- Bury St Edmunds Leisure Centre
- Moyse's Hall
- Nowton Park Lodge Cottage and toilets
- Provincial House
- Rangers Flat, Hardwick Heath
- The Severn Road Enterprise Units
- The Elms, Brandon Housing
- Jubilee Walk toilets
- Ram Meadow toilets
- Recreation Ground toilets
- West Stow Country Park toilets
- West Suffolk House

Figure 4 – Emissions from building utility consumption over time



Electric vehicle charging

The cumulative number of EVs that can charge simultaneously using public charging infrastructure installed by WSC is 70. More installations for public car parks are planned during 2024-25. The electricity provided to support public charging infrastructure in West Suffolk accounts for 37tCO₂.

3. Renewable energy

Target: Increase the amount of renewable energy generated each year.

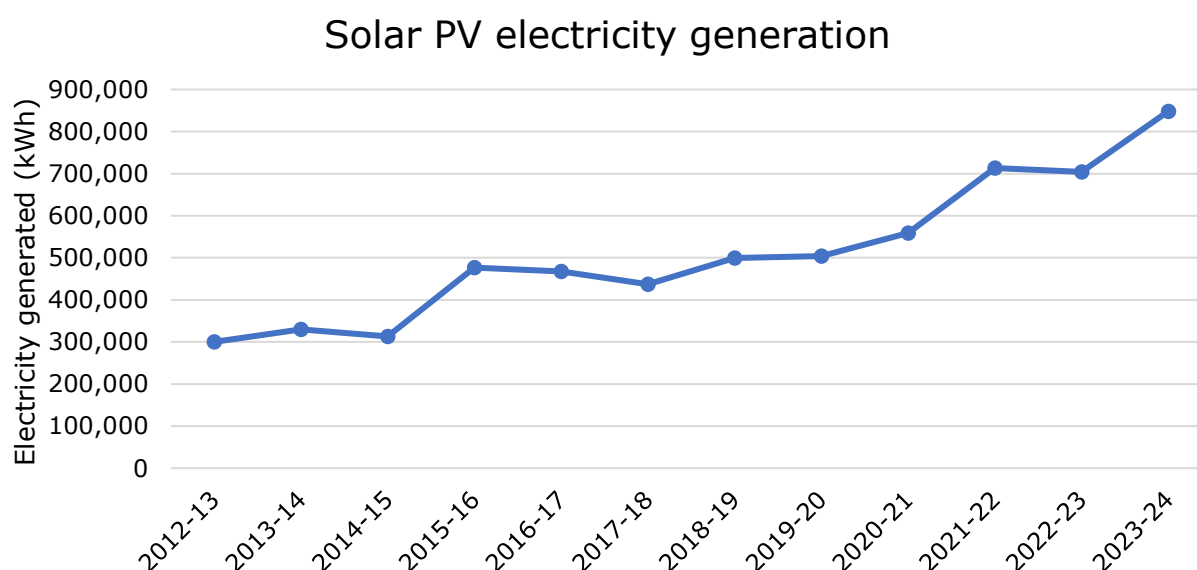
Renewable energy generated	
Baseline generation in 2012-13	300,220kWh
Generation in 2022-23	848,161kWh

The council has installed solar PV systems to reduce its electricity costs and carbon emissions. The energy generated by all systems installed on council offices, parks cafes, depots and leisure centres is totalled in this section.

The total capacity of the PV systems installed on West Suffolk Council property and leisure centres stands at 1,174 kilowatt peak (kWp) and they generated 848,161 kilowatt hours (kWh) of electricity during 2023-24, which is enough to power 239 average sized homes for the year. This figure is more than last year due to installing additional PV systems at West Suffolk Operational Hub and West Stow.

Figure 5 below shows the amount of electricity generated per year which is generally increasing over time.

Figure 5 – Annual renewable electricity generation on council properties.



We also install solar PV on third party buildings through the council’s [Solar for Business](#) scheme. 2023-24 was a record year for installations, with 2,412 kWp installed, bringing the total to 7,668 kWp. This is not included in our carbon accounting, as electricity is consumed by third parties.

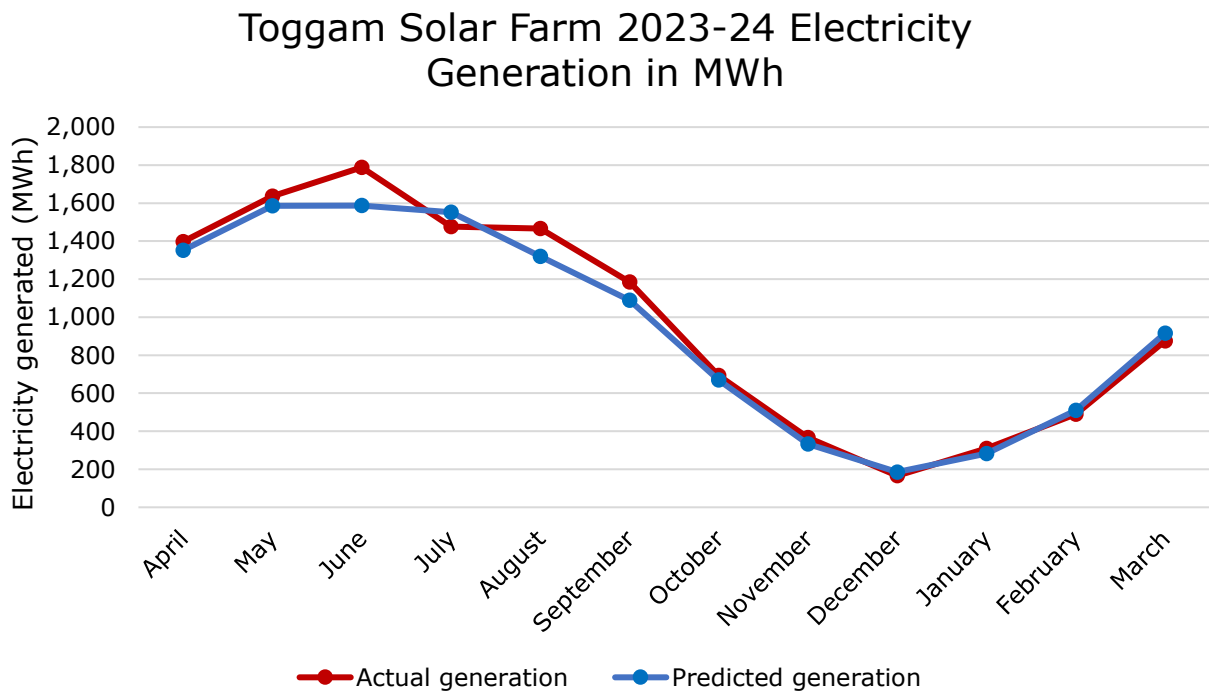
Toggam solar farm

During 2023-24 the solar farm generated 11,851 megawatt an hour (MWh) of renewable electricity which was 4 per cent above target for the year. Figure 6 shows the target electricity generation along with actual generation for Toggam Solar Farm in 2023-24.

The financial performance far exceeded the original business case due to the high value of electricity during this period. Since the purchase of the solar farm in 2016, £12.7m has been generated in energy sales, and the original investment of £14.3m will be repaid in the summer of 2024. The original business case forecast a payback of 10 years, but this will be achieved in 8 years.

The electricity that is sold into the National Grid is enough to power around 3,320 homes and offset the carbon dioxide emissions from 1,509 cars.

Figure 6 – Chart showing electricity generation during 2023-24.



4. Fuel use

Target: Reduce the emissions from total fuel consumption from the baseline year in 2010.

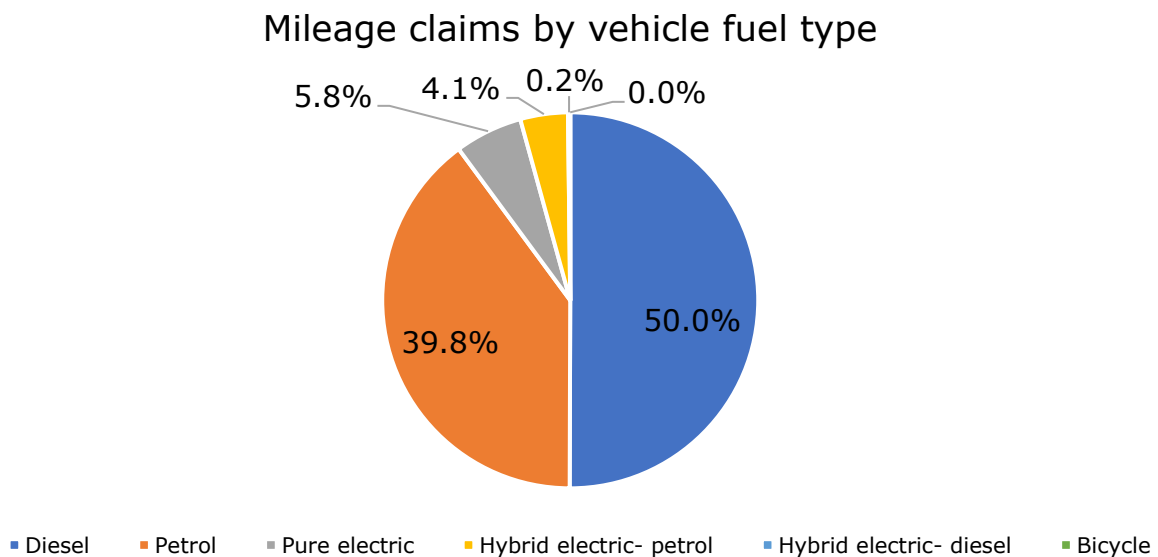
Fuel use	
Consumption in 2019-20	773,431 litres
Consumption in 2022-23	704,310 litres

This section includes the total litres of fuel used in, but not limited to, refuse collection vehicles, road sweepers, grounds maintenance vehicles, petrol or diesel bought using fuel cards and industrial mobile machinery.

Total emissions from fuel use are 12 per cent below the baseline year of 2019-20 and down by 3 per cent compared to 2022-23. There were 94tCO₂e of out-of-scope emissions from fuel use in 2023-24. See Appendix 1

Figure 13 shows the breakdown of mileage claims by vehicle fuel type.

Figure 13 - Total mileage claims by fuel type

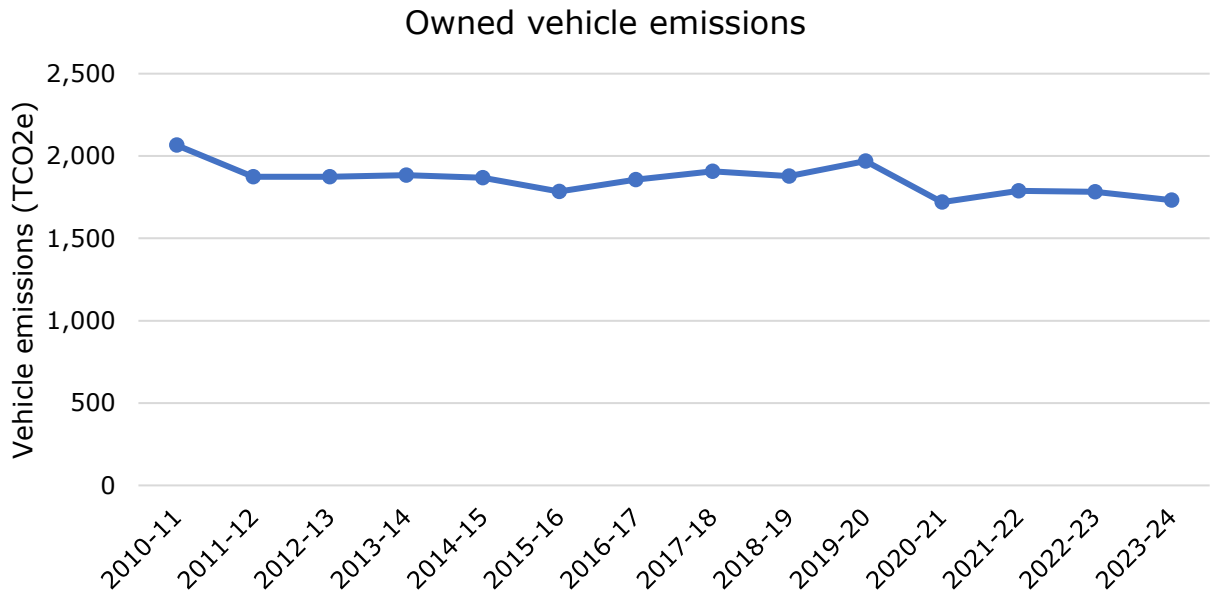


Appendix 2 for more details on out-of-scope reporting.

The council's road registered electric fleet vehicles have travelled 29,991 miles during 2023-24, producing zero point of use emissions. Driving the electric vehicles has saved 5.1tCO₂e compared to driving the same distance using a similarly sized diesel equivalents.

The increase in EV mileage has been driven by the addition of new EVs to the fleet including four small vans and one larger transit van, more information can be found in the press release [West Suffolk Council - West Suffolk EV fleet grows.](#)

Figure 7 – Chart showing owned vehicle emissions by year.



5. Business travel

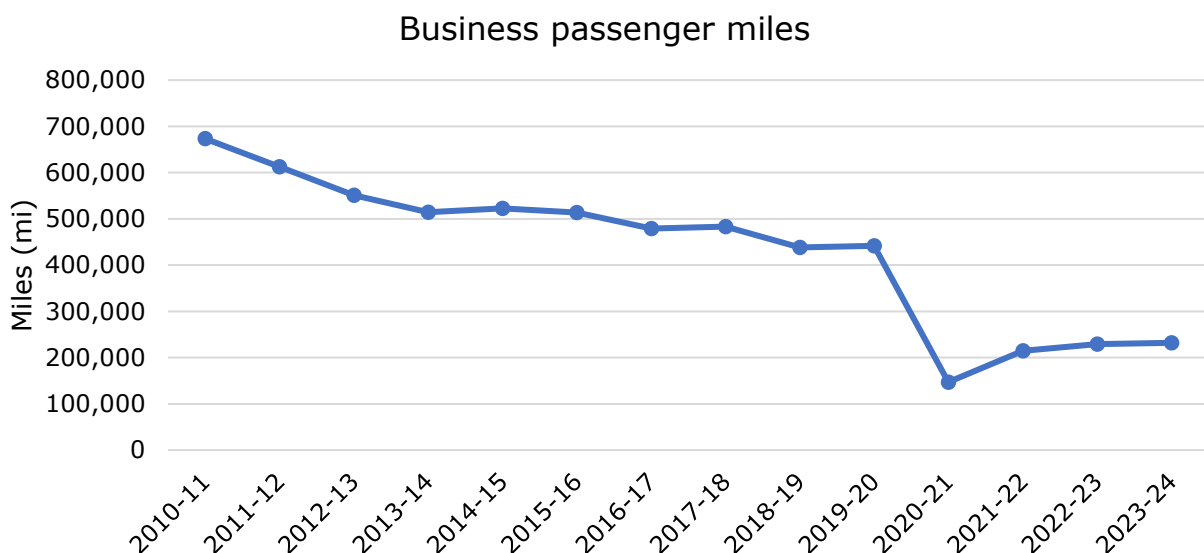
Target: Reduce the amount of grey fleet miles from the baseline year in 2010. Grey fleet includes vehicles that are owned and used by council employees.

Distance travelled	
Baseline 2010	673,285 miles
Distance travelled in 2023-24	232,037 miles

Business travel includes staff and councillor journeys, pool car use and other owned or leased vehicles. Business travel has increased 1 per cent compared to 2022-23, as shown in Figure 8 below however, the total miles travelled remains 66 per cent lower than the 2010 baseline. Business travel contributed 58.6tCO₂e to the council's total emissions. Of the total distance travelled, private car use (grey fleet) increased by 2 per cent and pool car use decreased by 89 per cent compared to 2022-23. During 2023-24, 6 per cent of total staff mileage claims were for journeys taken in a pure electric vehicle and the council aims to increase this percentage over time. Appendix 1 contains a breakdown of the total claims by vehicle fuel type.

Although the council doesn't own the vehicles used for business mileage, it is responsible for the emissions created from business activity. These emissions are reported in scope three. Appendix 2 contains more details on emissions scopes. The continued use of agile working and technology such as Microsoft Teams has helped to keep staff mileage lower than pre pandemic levels. The council will continue to use these arrangements, helping to minimise emissions from business travel.

Figure 8 – Chart showing business passenger miles travelled.



Public transport

Staff used public transport to cover 9,246 miles during 2023-24 which was 50 per cent lower than last year. This decrease is due to the end of a European funded project that required international travel. Use of public transport produced 558 kgCO₂e during 2023-24.

6. Water consumption

Target: Reduce the amount of water used in council activities from the baseline year in 2010.

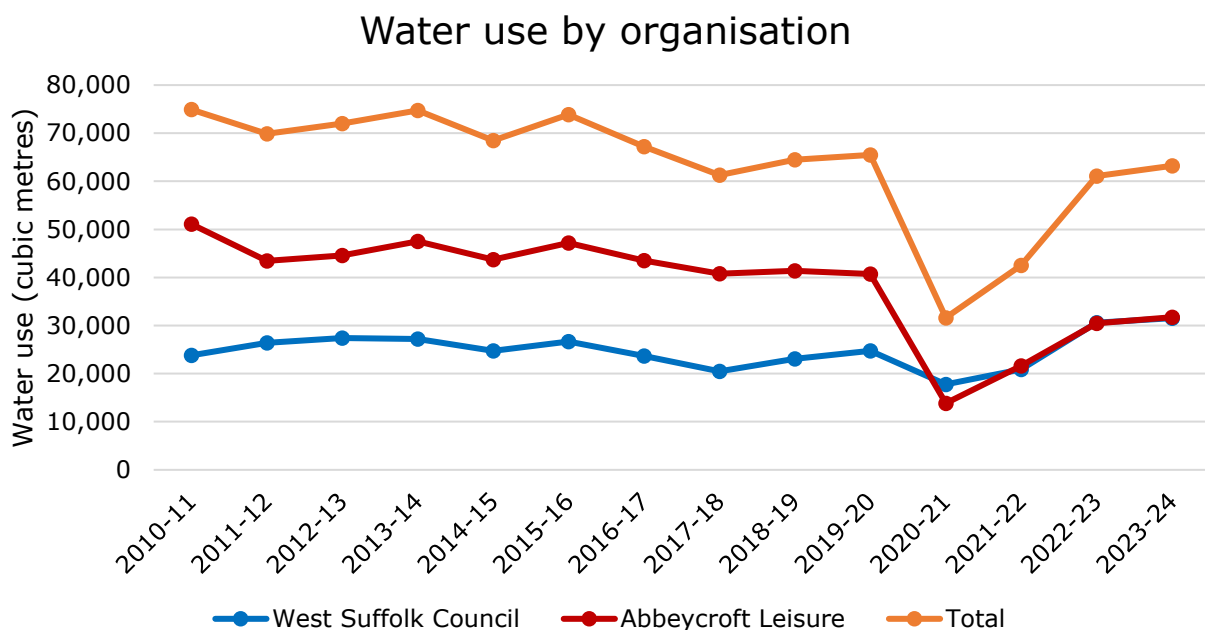
Water consumption (m³)	
West Suffolk Council baseline consumption in 2010	23,827
West Suffolk Council consumption in 2023-24	31,534
Abbeycroft Leisure baseline consumption in 2010	51,076
Abbeycroft Leisure consumption in 2023-24	31,705
Total baseline consumption in 2010	74,903
Total consumption in 2023-24	63,239

This section includes the total of water consumption from all WSC owned and operated properties, as well as those run by ACL. Total water consumption contributed 24tCO₂e during 2022-23.

Total water consumption has decreased by 16 per cent compared to the 2010 baseline and consumption has increased by 4 per cent compared to 2022-23.

This is comprised of a 3 per cent increase in water consumption for WSC and a 4 percent increase for ACL. Figure 9 shows the change in total water consumption over time and by organisation. The council continues to install water saving taps that started with publicly accessible sites to reduce water consumption.

Figure 9 – Chart showing total water consumption by year



7. Office waste

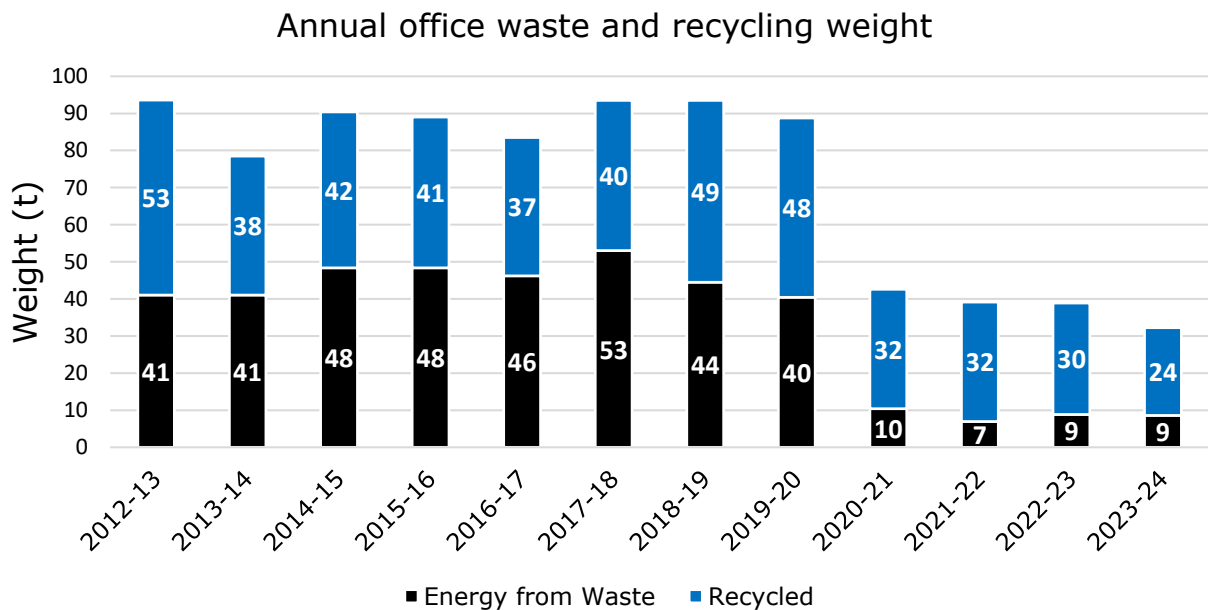
Target: To increase the office waste recycling rate and decrease the total waste arising from council operations from the baseline year 2018.

Waste arisings	Tonnes (t) or percentage
Baseline 2018	93.53t
Waste arisings in 2023-24	32.22t
Recycling rate 2023-24	73.31 per cent

During 2023-24, the total amount of waste generated was 32.22 tonnes. Of this, residual waste accounted for 8.6 tonnes and recycling was 23.62 tonnes.

Figure 10 shows the proportion of waste recycled compared to that sent to the Energy from Waste (EfW) centre each year. EfW aims to move waste up the waste hierarchy, unlocking useful electricity from waste which would otherwise have gone to landfill. More information on the Suffolk EfW facility can be found at [Suffolk EfW](#).

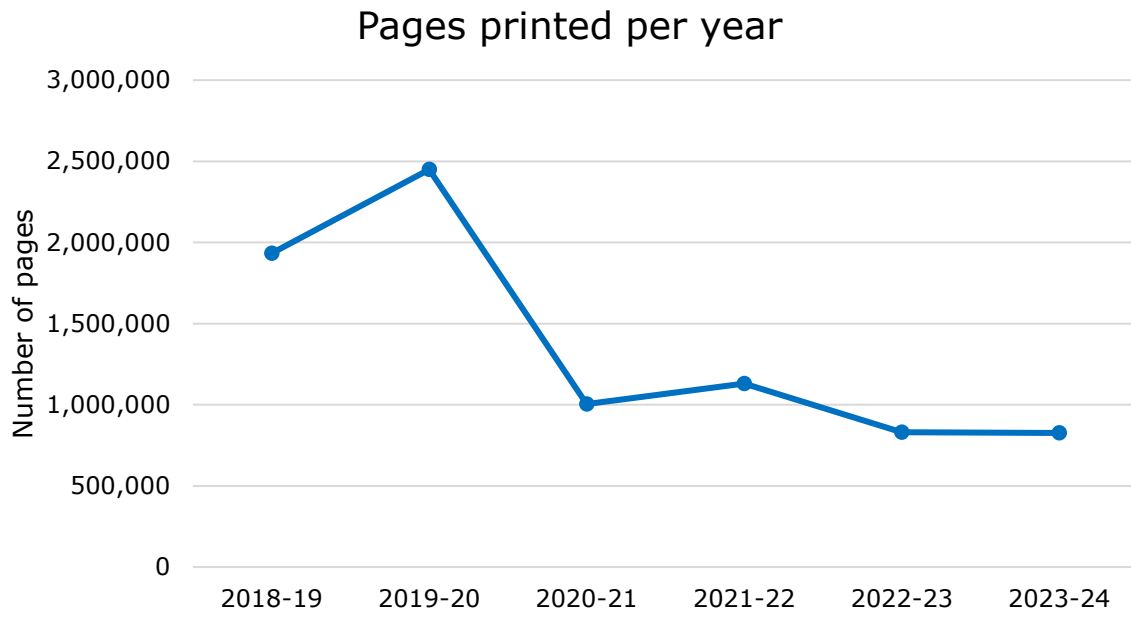
Figure 10 – Chart showing annual office waste and recycling weights.



Office printing

In 2023-24, 826,087 pages were printed. This is a 1 per cent decrease from 2022-23 and is 66 per cent lower than 2018-19.

Figure 11 – Chart showing number of pages printed per year.



8. Biodiversity and parks

Target: Maintain or increase the number of green flag accredited sites compared to the baseline year 2016.

Green flag status

The following sites successfully retained Green Flag accreditation during 2021-22:

- Abbey Gardens, Bury St Edmunds
- Aspal Close, Mildenhall
- Brandon Country Park, Brandon
- East Town Park, Haverhill
- Nowton Park, Bury St Edmunds
- West Stow Country Park, Bury St Edmunds

More information on Green Flag Awards can be found at [Green Flag Award](#).

The number of trees planted in on council owned land was 136 trees and 600 whips.

New Park Guides

A new pull-out guide has been produced that details all you need to know about the main 5 parks and many more green spaces. The guide is currently available from the Apex and park cafes see Figure 12.

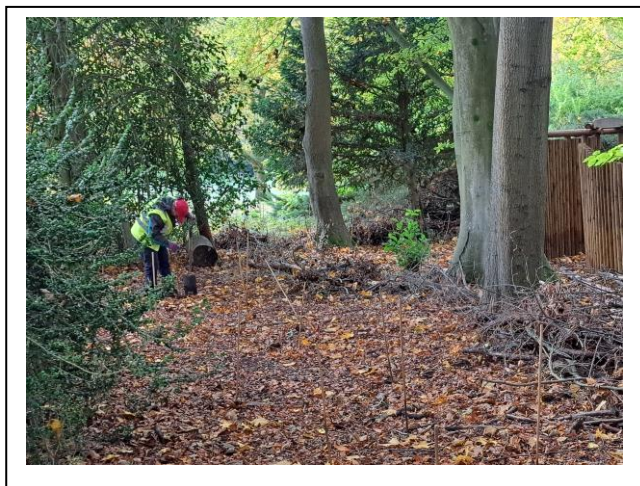
Figure 12 - Parks guide



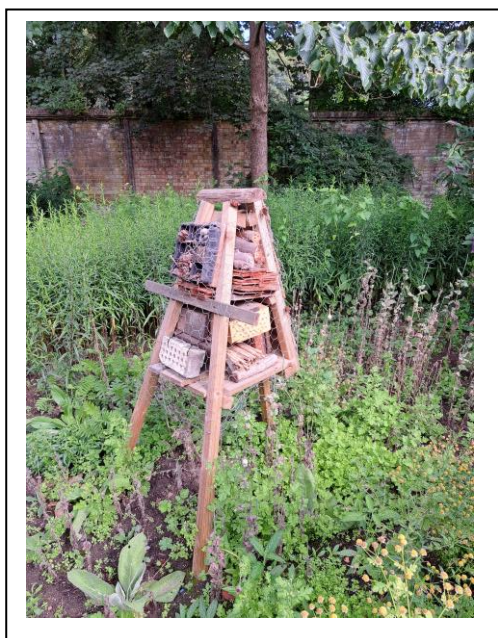
Ongoing biodiversity and natural environment programmes

Brandon Country Park

Rangers and volunteers have been helping to make a variety of environmental improvements at Brandon Country Park including whip planting to act as screening behind the new Fire Crest Community Theatre, an initiative working with the Brandon Creative Forum.



Making bug hotels in the walled garden and sowing wildflowers in the main lawn area-



East Town Park

Crested cow wheat has been discovered on Millfield's Way County Wildlife Site; the Rangers and volunteers have made a concerted effort to encourage this nationally rare plant with great success.



Abbey Gardens

The Friends of Abbey Gardens and two local schools planted naturalising bulbs either side of the main avenue in the Abbey Gardens. A variety of different species of native bulbs were chosen to encourage local wildlife such as bees and butterflies.





Abbey Gardens hosting Abbey Alive BioBlitz event

A Bioblitz event was held in the Abbey Gardens on May 19th & 20th. The event was arranged by the Bury Water Meadows Group and West Suffolk Hive. A variety of activities was undertaken during the 2 days including interactive walks, talks, school activities and entertainment.



Hedgehog Awareness

The council's landscape teams are continuing to support hedgehog awareness by adding informative stickers to machinery and staff training to raise awareness.



Hedgehog awareness sticker on strimmer & hedgehog in Abbey Gardens

The Rural England Prosperity Fund Projects

Projects have been completed at Brandon, Mildenhall and Newmarket.



Extending and improving the Northern section of the Yellow Brick Road Linear Park in Newmarket linking to the Guarded Orchard.



Reviewing the corner greens at Breckland way, Mildenhall to address the dilapidated boundaries.

Refurbishing the infrastructure at the Terry Hagger Memorial Garden memorial and relandscaping the communal area.



Infrastructure improvements and new planting at Rought Avenue Community Open Space, biodiversity enhancements including sowing a grass and wildflower mix and new planting.

9. Environmental compliance

Target: No incidents leading to formal action being taken by regulatory bodies.

Target date: Ongoing

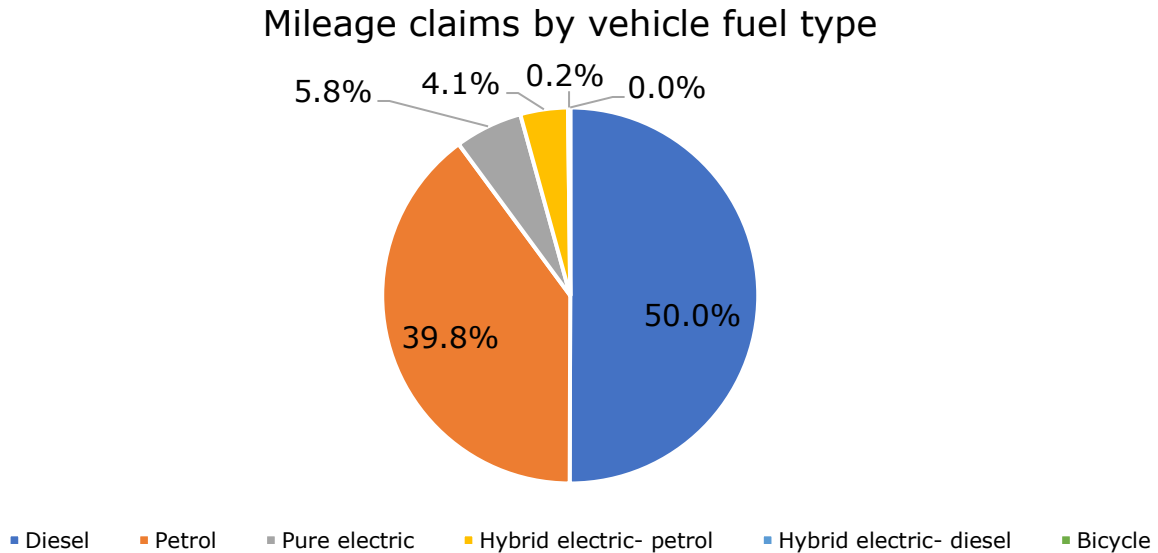
The council continues to maintain environmental permits for two operational sites located in Bury St Edmunds and Haverhill, which are used to support the strategic management of West Suffolk's municipal waste. The Environment Agency and the Health and Safety Executive (HSE) have carried out regulatory inspections and reported there have been no compliance issues, breaches of the permit conditions or any action required by them in any aspects of the requirements.

We eagerly await the central government reforms to waste collection in England. In the meantime, we continue to work closely with strategic partners to meet the forthcoming challenges and to maintain compliance while ensuring that waste collected is managed in a safe, efficient, and cost-effective way.

Appendix 1

Figure 13 shows the breakdown of mileage claims by vehicle fuel type.

Figure 13 - Total mileage claims by fuel type



Appendix 2 Emissions scopes

Figure 14 shows the total greenhouse gas emissions by reporting scope. The greatest proportion of emissions originates from Scope 1, referred to as direct emissions; this includes emissions from the consumption of gas and owned transport. Table 2 details where each source of emissions sits within the reporting framework.

Figure 14 – Total emissions by reporting scope.

Emissions by scope 2023-24

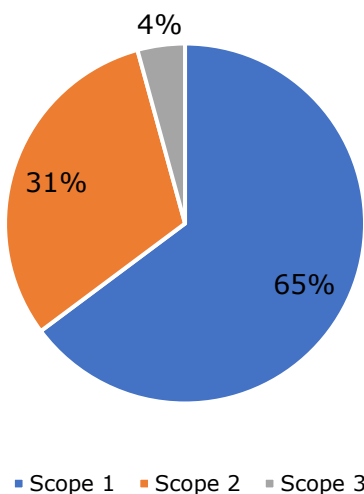


Table 2 – Sources of emissions by scope

Emissions scopes	Activity	Emissions
<p>Scope 1 – direct emissions</p> <p>Emissions from the activities of an organisation or under its control.</p>	<ul style="list-style-type: none"> • WSC gas consumption • WSC owned transport • WSC propane • ACL gas consumption • ACL biomass 	3,226tCO ₂ e
<p>Scope 2 – indirect emissions</p> <p>Emissions from electricity or other energy purchased and used by the organisation. These emissions are created during the production of the energy by another before they are used by the organisation.</p>	<ul style="list-style-type: none"> • WSC purchased electricity • ACL purchased electricity 	1,540tCO ₂ e
<p>Scope 3 – all other indirect emissions</p> <p>All other indirect emissions from activities of the organisation, occurring from sources that it does not own or control. The council currently only reports key Scope 3 emissions sources.</p>	<ul style="list-style-type: none"> • WSC purchased electricity transmission and distribution • ACL purchased electricity transmission and distribution • WSC public transport • WSC water consumption and treatment • ACL water consumption and treatment • WSC pool cars • WSC staff and councillor mileage in personal vehicles 	212tCO ₂ e
Total emissions		4,979tCO₂e
<p>Emissions per resident</p> <p>Resident population: 179,948 Data source: Suffolk Observatory</p>		27.67KgCO ₂ e/ resident
<p>Out of scope</p> <p>Direct carbon dioxide impact of burning biomass and biofuels where the Scope 1 impact of these fuels has been determined to be net zero – since the fuel source itself absorbs an equivalent amount of CO₂e during the growth phase as the amount of CO₂e released through combustion.</p>	<ul style="list-style-type: none"> • WSC fuel consumption with average biofuel blend • WSC biomass use • ACL biomass use 	59tCO ₂ e

Notes

- Calculations include floor area apportionment for gas, electricity & water at Mildenhall Hub.
- Calculations exclude water consumption and use estimated data for gas and electricity at Skyliner leisure centre due to metering issues.
- Gas consumption at Haverhill leisure centre is estimated using last year’s data.
- The council is working to secure accurate data where omitted and the environmental statement will be updated once data becomes available.

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Gambling Policy Statement update

Report number:	CAB/WS/24/039	
Report to and date:	Cabinet	23 July 2024
Cabinet member:	Councillor Gerald Kelly Portfolio Holder for Governance and Regulatory Tel: 07968 396389. Email: gerald.kelly@westsuffolk.gov.uk	
Lead officer:	Jennifer Eves Director – Housing, Communities and Regulatory Tel: 01284 757015 Email: democratic.services@westsuffolk.gov.uk	

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.

Wards impacted: All wards

Recommendation: It is recommended that Cabinet approves the undertaking of statutory consultation to renew the West Suffolk Gambling Act Statement of Policy and West Suffolk Local Area Profile, as set out in sections 2 and 4 of Report number: CAB/WS/24/039.

1. **Context to this report**

1.1 The West Suffolk Statement of Gambling Policy sets out how the council, in its role as licensing authority, will carry out its functions under the Gambling Act 2005. It recognises the importance of responsible gambling within the entertainment industry, while seeking to balance this with the key objectives of the Act. The objectives are:

- 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 is conducted in a fair and open way
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

1.2 The objective of the statement of policy is to provide a vision for the local area and a statement of intent that guides 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 can invite people and operators to consider local issues and set out how they can contribute towards positively addressing them.

1.3 **Potential legislation changes**

In April 2023, the government released a White Paper that proposed reforms of the Gambling Act, 2005, to ensure that gambling companies pay for treatments for issues relating to gambling addiction, proposed new player protection checks and stake limits for online slots. The paper also proposed to strengthen powers granted to the Gambling Commission to fine gambling operators for failing to protect people at risk.

1.4 Since April 2023, additional proposals that are relevant to council's included the potential to introduce a Cumulative Impact Assessment area (CIA) around areas with large numbers of gambling premises, to prevent associated impacts. The proposals would require fundamental legislative changes, which would need to progress through parliament. As of April 2024, no such Bill has been scheduled – and it is considered unlikely that this will be introduced to parliamentary business this year.

1.5 In response, we are diligently following the advice of the Gambling Commission and the Department for Culture, Media and Sport in conducting our regular statutory review, consultation and renewal process. However, should national changes be implemented, a subsequent review and consultation may be required next year. This should ensure that our policies remain aligned with the new national

standards after the current Gambling Policy Statement is renewed by January 2025.

1.6 **Limitations**

West Suffolk Council's approach to gambling policy is limited in two ways:

- Timing
 - The council has a statutory requirement to review and renew the Gambling Policy Statement by the end of January 2025 – if it is not renewed, the council is in contravention of legal guidance, and the policy is voided. While it is unknown when proposed changes to gambling legislation are likely to be introduced, it is possible that it will occur after the renewal of the council's Gambling Policy Statement in January 2025.
 - A statement of policy typically runs for a period of three years, although there is nothing to prevent the authority from updating more frequently if it wishes to.
- Implementation
 - Current legislation limits changes that the council can make to the Gambling Policy Statement. West Suffolk is not an area with large levels of gambling related issues and has few gambling premises. Online gambling, which may account for a large amount of the gambling that occurs locally, is outside the remit of the council and the policy.
 - However, a robust Local Area Profile (LAP) is an assessment of the key characteristics of West Suffolk in the context of gambling-related harm. The information obtained for the assessment helps to provide a better understanding of the types of people that are at risk of being vulnerable to gambling-related harm; where they are located and any current or emerging problems that may increase that risk. The local area profile will help set out our expectations of operators of gambling premises. This information is available to members of the Licensing and Regulatory Committee, who retain the ability to make decisions on new gambling premises on a case-by-case basis.

2. **Proposals within this report**

2.1 The policy statement summarises West Suffolk Council's approach to licensing gambling activities. It sets out how the council exercises its functions in relation to gambling licensing matters under the Gambling Act 2005.

2.2 The Act regulates the following sectors:

- Arcades
- Betting
- Bingo
- Casinos
- Gambling software

- Gaming machines
- Lotteries
- Remote gambling

2.3 In light of prospective national changes, including legislative changes, West Suffolk Council has sought advice from the Local Government Association, as well as the national bodies responsible for gambling: the Department for Culture, Media and Sport (DCMS) and the Gambling Commission.

2.4 The advice provided is that the West Suffolk Council Gambling Statement is refreshed in line with the requirements of the Gambling Act so as to be enforceable from January 2025. Thereafter, the authority will be able to revise the Statement within the three-year timescale.

2.5 As such, it is proposed that we continue with the regular process of renewal:

- Update the policy and Local Area Profile by January 2025 in line with current legislative changes or advice (if any)
- Then update the Statement once new legislation or guidance are released after January 2025.
-

2.6 **Summary of changes and consultation**

The council has updated the Gambling Policy Statement and Local Area Profile (LAP), revising key statistics and background information as necessary.

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

3.1 The council is statutorily obliged to publish a Statement of Gambling Policy, and to consult on that policy in a way that the council deems appropriate.

3.2 However, advice from the relevant regulatory bodies has been sought and confirmed that it is not possible to extend the Gambling Policy Statement without statutory consultation.

4. **Consultation and engagement undertaken**

4.1 The council is required to carry out a stakeholder consultation on the proposed changes. Given the minor changes, and in line with standard practice, it is proposed that a small stakeholder consultation take place between August and September 2024.

- 4.2 The proposed stakeholders are:
- The police constabulary
 - Parish and town councils
 - Public Health (Suffolk County Council)
 - Persons or bodies representative of license holders/businesses in the area
 - Other government departments (i.e. HM Revenues and Customs)
 - Charities and the third sector.

5. Risks associated with the proposals

- 5.1 There are no risks associated with the proposals. All elements of the policy statement are already council practice, as directed by statutory guidance.

6. Implications arising from the proposals

- 6.1 Financial - there are no specific financial implications arising from this report.
- 6.2 Legal compliance - there are no specific legal implications arising from this report.
- 6.3 Personal data processing - there are no specific data implications arising from this report.
- 6.4 Equalities - there are no specific equalities implications arising from this report.
- 6.5 Crime and disorder – the council has a duty to consider the potential impact of its decisions on crime and disorder. It is anticipated that the actions in this report will all have a positive or neutral impact on crime and disorder.
- 6.6 Safeguarding – the council has a duty to consider the potential impact of its decisions on safeguarding. However, there are no specific implications arising from this report.
- 6.7 Environment or sustainability - there are no specific environment or sustainability implications arising from this report.
- 6.8 HR or staffing - there are no specific equalities implications arising from this report.
- 6.9 Changes to existing - policies there are no specific equalities implications arising from this report.
- 6.10 External organisations (such as businesses, community groups) - officers included partner organisations as key external stakeholders.

7. Appendices referenced in this report

- 7.1 Appendix A – Draft West Suffolk Gambling Act Statement of Policy 2025 to 2028
- 7.2 Appendix B – Draft West Suffolk Local Area Profile

8. Background documents associated with this report

- 8.1 [CAB/WS/21/048: West Suffolk Gambling Act 2005: Statement of Policy 2022 to 2025](#)



Appendix A

West Suffolk Gambling Act 2005 Statement of Policy

**Effective XXX to XXX
(Unless revised sooner)**

Preface

Section 349 of the Gambling Act 2005 requires all licensing authorities to prepare and publish a statement of policy that they propose to apply in exercising their functions under the act during the three-year period to which the policy applies.

West Suffolk Council developed this document with due regard to all available regulations, conditions, codes of practice, statutory guidance, practical experience of legislation and any consultee responses. Should anything in future publications, legislative or regulatory changes or case law impact upon the content of this 'statement of policy' document, then it will be taken into account and the document may be updated at a later stage and with due consideration to the resource implications for the licensing authority.

All references made within this document to the Gambling Commission Guidance for Licensing Authorities, and any extracts quoted thereof.

Throughout this statement of policy, the term 'the council' and 'the licensing authority' should be read as applying to West Suffolk Council's licensing authority functions. For more information visit:

- [Gambling Commission](#)
- [Department for Culture, Media and Sport](#)
- [West Suffolk Council](#)

If you need this information in another format or language, phone 01284 758050 or email licensing@westsuffolk.gov.uk to discuss your need.

Contents

Preface	2
Part A. General.....	4
1. The licensing objectives	4
2. West Suffolk Council.....	4
2.1 Background.....	4
2.2 About the area	5
2.3 Policy development	6
2.4 Licensing Service contact details	6
3. Declaration.....	7
4. Responsible authorities	7
5. Interested parties	7
6. Exchange of information	8
7. Enforcement.....	8
8. Licencing authority functions	9
9. Appeals.....	10
10. Risk assessment and local area profile	10
10.5 Local area profiles.....	11
Part B. Premises licences	12
1. General principles	12
2. Reviews	18
3. Provisional statements.....	19
4. Temporary use notices.....	20
5. Occasional use notices	21
6. Casinos.....	21
7. Bingo premises	22
8. Betting premises	22
9. Tracks	23
10. Adult gaming centre's.....	31
11. (Licensed) family entertainment centre's.....	31
Part C. Permits, temporary use notices and occasional use notices	33
1. Unlicensed family entertainment centre (unlicensed FEC's) gaming machine permits.....	33
2. Club gaming permits	34
3. Club machine permits	35
4. (Alcohol) licensed premises gaming machine permits.....	36
5. Prize gaming and prize gaming permits.....	38
6. Travelling fairs.....	39
7. Society lotteries	39
Schedule A	42
Gambling Act 2005 Statement of Licensing Principles: consultee list.....	42
Schedule B	44
Schedule C	47
Schedule D	48
Authorised gambling activities	48

Part A. General

1. The licensing objectives

1.1 In exercising most of its functions under the Gambling Act 2005, the licencing authority must have regard to the licensing objectives as set out in section 1 of the Gambling Act 2005 ('the Act'). The licensing objectives are:

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

The Gambling Commission has stated, with limited exceptions, the intention of the Gambling Act 2005 is that children and young persons should not be permitted to gamble and should be prevented from entering those gambling premises which are adult only environments. The objective refers to protecting children from being 'harmed or exploited' by gambling. This means preventing them from taking part in gambling activities except limited authorised activities (see schedule D), and for there to be restrictions on advertising so that gambling products are not aimed at children or advertised in such a way that makes them particularly attractive to children excepting category D machines.

1.2 In accordance with section 153 of the act, in making decisions about premises licenses and temporary use notices the licensing authority should **aim to permit** the use of the premises for gambling purposes in so far as it thinks it:

1. in accordance with any relevant code of practice issued by the Gambling Commission
2. in accordance with any relevant guidance issued by the Gambling Commission
3. reasonably consistent with the licensing objectives, and
4. in accordance with the authority's statement of policy.

2. West Suffolk Council

2.1 Background

2.1.1 In 2011 the former district councils of Forest Heath District Council and St Edmundsbury Borough Council agreed to build on several years of informally sharing services by creating a West Suffolk partnership. This partnership was maintained until the two councils become West Suffolk Council on 1 April 2019. The former councils adopted several joint policies and strategies and also a shared constitution for West Suffolk which allows the councils to maintain their own local identity where appropriate.

2.1.2 In 2024, West Suffolk Council adopted Strategic Priorities that set out the vision and priorities for West Suffolk. The shared vision and strategic priorities are contained in the [West Suffolk Strategic Priorities, 2024-28](#), available at: [West Suffolk Council – Strategic Priorities](#)

2.2 About the area

The area of West Suffolk comprises the former areas of Forest Heath District Council and St Edmundsbury Borough Council, two predominantly rural districts in the heart of East Anglia. Well-connected with London, the rest of East Anglia and the Midlands, West Suffolk is a safe and comparatively prosperous place in which to live. It also has some beautiful and accessible countryside areas, including grassland, heath and forest.

West Suffolk has five main market towns, Brandon, Bury St Edmunds, Haverhill, Newmarket and Mildenhall.



Bury St Edmunds, the largest settlement in West Suffolk, has been a prosperous town for centuries, with people drawn to its market and Georgian architecture, shops, leisure and cultural facilities.

Newmarket is known as the 'home of horseracing'. It has more racehorses, trainers, stable staff, stud farms and racing organisations in and around the town than anywhere else in the world, with racing accounting for a significant number of local jobs.

Haverhill, Mildenhall and Brandon expanded significantly in the 1970s due to the construction of new housing to accommodate families moving as part of the Greater London Council's expansion programme.

Today, West Suffolk has a thriving, diverse economy, embracing a number of business sectors. These include tourism, food and drink, life sciences and advanced manufacturing, including businesses trading with the two major US Air Force bases in West Suffolk.

In all West Suffolk's towns and rural areas, many of the residents benefit from a good quality of life. However, some areas have suffered more than others from the impact of the economic downturn, and others are facing issues such as: rural isolation, a lack of skills or qualifications amongst young people, an ageing population with some in need of more specialist housing or care, poverty, or health deprivation.

2.3 Policy development

2.3.1 Licensing authorities are required by the Act to publish a statement on the principles which they propose to apply when exercising their functions. This statement must be published at least every three years. The statement must also be reviewed from 'time to time' and any amended parts must be reconsulted upon. Following any amendment and consultation, the revised statement will then be re-published.

2.3.2 West Suffolk Council consulted upon this statement of policy before it was finalised and published. The Gambling Act 2005 requires that the following parties are consulted by licensing authorities:

- The Chief Officer of Police
- One or more persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the authority's area
- One or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the exercise of the authority's functions under the Gambling Act 2005.

A list of the persons to be consulted by the licensing authority is attached to this document as **Schedule A**.

2.3.3 This policy will be consulted upon with key stakeholders between August and September 2024 and presented to Cabinet in November 2024 and Full Council December 2024 for consideration of re-adoption.

2.3.4 It should be noted that this statement of policy document shall **not** override the rights of any person to make an application, make representations about an application, or apply for a review of a licence, as each will be considered on its own merits and according to the statutory requirements of the Gambling Act 2005.

2.4 Licensing Service contact details

West Suffolk Council

Licensing team

West Suffolk House

Western Way

Bury St Edmunds

Suffolk

IP33 3YU

Telephone: 01284 758050

Email: licensing@westsuffolk.gov.uk

Website: www.westsuffolk.gov.uk

3. Declaration

- 3.1 In producing this statement of policy the licensing authority declares that it has had due regard to the licensing objectives of the Gambling Act 2005 (see 1.1 of this document), the guidance issued by the Gambling Commission, and any responses from those consulted on the statement of policy.

4. Responsible authorities

4.1 Responsible authorities are bodies that must be notified of applications, and that are entitled to make representations in relation to applications for, and in relation to premises licences.

The responsible authorities are:

- the licensing authority in whose area the premises is situated
- the Gambling Commission
- Suffolk Police
- Suffolk Fire Brigade
- Suffolk County Council Public Health team
- Planning Service
- HM Revenue and Customs.
- Suffolk local Safeguarding Children Board.

- 4.2 In accordance with Gambling Commission Guidance for Licensing Authorities. This authority intends to designate the **Suffolk Safeguarding Partnership** for this purpose. The Suffolk Local Safeguarding Children Board has an arrangement with the Suffolk Constabulary for the Constabulary to act as their nominated agent in relation to Gambling Act 2005, when considering applications with a view to protecting children from harm.

5. Interested parties

- 5.1 Interested parties can make representations about licence applications or apply for a review of an existing licence. The Gambling Act 2005 defines interested parties as persons who:

- a. live sufficiently close to the premises to be likely to be affected by the authorised activities
- b. have business interests that might be affected by the authorised activities, or
- c. represents persons who satisfy paragraph a. or b.

- 5.2 The licensing authority is required by regulations to state the principles it will apply in exercising its powers under the Gambling Act 2005 to determine whether a person is an interested party. The principles are:

- Each case will be decided upon its merits, and
- The licencing authority will not apply a rigid rule to its decision making. It may have regard to a number of factors, for example:
 - the size of the premises
 - the nature of activities the applicant proposes to provide at the premises, and

- guidance from the Gambling Commission that 'business interests' should be given the widest possible interpretation.

5.3 Interested parties can include persons who are democratically elected such as county, parish and town councillors and MPs. Other than these persons, the licensing authority will normally require written evidence that a person 'represents' someone who either lives sufficiently close to the premises to be likely to be affected by the authorised activities and/or business interests that might be affected by the authorised activities.

5.4 If individuals approach councillors to ask them to represent their views, then care should be taken that the councillors are not subsequently appointed as part of a licensing sub-committee who may be involved with the determination of dealing with the licence application. If any further guidance is required, generally or in individual cases, then please contact the Licensing Section at West Suffolk Council.

6. Exchange of information

6.1 This licensing authority will, when exchanging information that it holds relating to gambling premises, permits and temporary permissions, apply the following principles:

1. Act in accordance with the provisions of the Gambling Act 2005.
2. Comply with the Data Protection Act 2018 and any subsequent or supplementary guidance provided by the Information Commissioner.
3. Comply with any relevant requirements of the Freedom of Information Act 2000.
4. The Gambling Commission's publication 'Advice to Licensing Authorities on information exchange with the Gambling Commission', with particular regard to Part 13 of the [Guidance](#) issued by the Gambling Commission.
5. Any relevant regulations issued by the Secretary of State under the powers provided in the Gambling Act 2005.

6.3 Should any protocols be established pursuant to section 350 of the Act concerning information exchange with the other bodies as listed in Schedule 6(1) of the act then these will be made available by the licencing authority.

7. Enforcement

7.1 Licensing authorities are required by regulation under the Gambling Act 2005 to state the principles to be applied by the authority in exercising the functions under Part 15 of the act with respect to the inspection of premises; and the powers under Section 346 of the act to institute criminal proceedings in respect of the offences specified. West Suffolk Council's corporate enforcement policy will be applied when considering, managing and taking enforcement action. A copy is available on the council's website.

7.2 This licensing authority's principles are that it will be guided by the Gambling Commission Guidance (in particular Part 36), the Regulators' Compliance Code, shall endeavour to regulate in the public interest and be:

- **proportionate:** regulators should only intervene when necessary and remedies should be appropriate to the risk posed, and costs identified and minimised

- **accountable:** regulators must be able to justify decisions, and be subject to public scrutiny
- **consistent:** rules and standards must be joined up and implemented fairly
- **transparent:** regulators should be open, and keep regulations simple and user friendly, and
- **targeted:** regulation should be focused on the problem and minimise side effects.

- 7.3 In accordance with the Gambling Commission guidance, the licensing authority will endeavour to avoid duplication with other regulatory regimes so far as possible.
- 7.4 Any inspection programme, which may be adopted by the licensing authority, shall be risk-based. This would include targeting high-risk premises which require greater attention, whilst operating a lighter touch in respect of low-risk premises, so that resources are more effectively concentrated on problem premises. Further details are available upon request.
- 7.5 The enforcement and compliance role for the licencing authority under the Gambling Act 2005 is to ensure compliance with the premises licenses and other permissions, which it authorises. The Gambling Commission is the enforcement body for operator and personal licences. Manufacture, supply or repair of gaming machines is dealt with by the Gambling Commission and not by the licensing authority.
- 7.6 This licensing authority will also endeavour to work in partnership with and support local businesses, having due regard to the stated principles and any best practice guidelines published by the Better Regulation Executive, in respect of its responsibilities under the Gambling Act 2005 and other regulatory functions of the local authority.
- 7.7 With due regard to the principle of transparency, any enforcement/compliance protocols or written agreements developed by the licencing authority shall be made available upon request to the Licensing Team.
- 7.8 In considering applications, and taking enforcement action, under the Gambling Act 2005 the licencing authority shall duly consider any Human Rights Act 1998 implications (in particular Article 1, Protocol 1 and Articles 6, 8 and 10).

8. Licencing authority functions

- 8.1 The act gives licensing authorities important regulatory functions in relation to gambling, the main functions of which are to:
- consider **notices** given for the temporary use of premises for gambling
 - grant **permits** for gaming and gaming machines in **clubs and miners' welfare institutes**
 - regulate gaming and gaming machines in **alcohol-licensed premises**
 - grant **permits** to **family entertainment centres** (FEC's) for the use of certain lower stake gaming machines
 - grant permits for **prize gaming**
 - consider **occasional use notices** for betting at tracks
 - register small societies' lotteries

- consider applications for **provisional statements**
- provide information to the Gambling Commission regarding details of licences, permits, notices and registrations issued (see section 6 above on 'Exchange of information')
- maintain registers of the permits, notices and licences that are issued under these functions, and
- prepare and publish, every three years (or sooner if required), a **statement of the policy** it proposes to apply when exercising its functions under the Gambling Act 2005.

Additions or amendments to the list above notified by the Gambling Commission will be published on the council's website or upon request direct to the Licensing Service.

8.2 The council's summary of delegations adopted under the Gambling Act 2005 is available separately on [West Suffolk Council – Gambling and lotteries](#) webpage.

8.3 It should be noted that local licensing authorities are not responsible for licensing remote or online gambling. This is the responsibility of the Gambling Commission.

9. Appeals

9.1 Appeals relating to premises licensing and other decisions by licensing authorities are covered within the relevant legislation and regulations and are referred to in Part 12 of the Gambling Commission guidance.

10. Risk assessment and local area profile

10.1 The Gambling Commission issue codes of practice under section 24 of the Gambling Act 2005, about the manner in which facilities for gambling are provided to ensure that:

- gambling is conducted in a fair and open way
- children and other vulnerable people are protected from being harmed or exploited by gambling
- assistance is made available to people who are, or may be, negatively affected by gambling.

10.2 Codes of practice are either:

- social responsibility code provisions - which must be adhered to by all licence holders
- ordinary code provisions – these do not have the status of licence conditions but failure to take account of them can be used as evidence in criminal or civil proceedings.

10.4 Operators will be required to prepare a risk assessment for their business that takes into account the nature and characteristics of the locality in which they are situated.

Assessing local risk

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy.
2. Licensees must review (and update as necessary) their local risk assessments:
 - a. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy
 - b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks
 - c. when applying for a variation of a premises licence, and
 - d. in any case, undertake a local risk assessment when applying for a new premises licence.

Sharing local risk assessments

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.

Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

10.5 Local area profiles

Such risk assessments can make reference to the council's area profile which may be compiled with respect to reported gambling related issues in an area. Effects of the gambling licence on the public health of the local population will be considered by the Licensing Authority prior to granting a request.

- 10.6 This position will be kept under review, however, as the council sees this as best practice and has compiled a guidance document using ward profiles and licensing figures. This document is available on our website [West Suffolk Council – Draft Gambling Act 2005 Local Area Profile 2021](#)

Part B. Premises licences

1. General principles

1.1 Premises licences are subject to the requirements set out in the Gambling Act 2005 and regulations. The act provides that conditions may be attached to licences in a number of ways:

1. automatically, having been set out on the face of the act
2. through regulations made by the Secretary of State
3. by the commission, to operating and personal licences
4. by the licensing authority, to premises licences and some permits, and
5. by the licensing authority, by excluding certain default conditions on a premises licence.

1.2 When determining an application, this licencing authority **aims to permit** the use of premises for gambling in so far as it thinks it is:

- in accordance with any relevant code of practice issued by the Gambling Commission
- in accordance with any relevant guidance issued by the Gambling Commission
- reasonably consistent with the licensing objectives, and
- in accordance with the Authority's statement of principles.

1.3 **Definition of 'premises':** Premises is defined in the act as 'any place'. A particular premises cannot be granted more than one premises licences under the gambling act at any one time. It is possible for a single building to be subject to more than one premises licence, provided they are for different parts of the building and the different parts of the building can be reasonably regarded as being separate premises. Whether different parts of a building can properly be regarded as being separate premises will always be a question of fact in the circumstances. However, the Gambling Commission does not consider that areas of a building that are artificially or temporarily separated, for example by ropes or moveable partitions, can be properly regarded as different premises.

1.4 The Gambling Commission guidance states that licensing authorities should take particular care when considering applications for multiple licenses for more than one premises licences for a single building, applications for a premises licence where part of the premises is used for non-gambling purposes. Specifically, the licencing authority will consider whether:

- entrances and exits from parts of a building covered by one or more licences are to be separate and identifiable so that the separation of different premises is not compromised, and that people cannot 'drift' into a gambling area
- premises are configured so that children are not invited to participate in, have accidental access to, or able to closely observe gambling where they are prohibited from participating, and
- customers are able to participate in the principal gambling activity authorised by the premises licence.

1.5 The Gambling Commission guidance also stipulates that licensing authorities should pay attention to applications where access to the licensed premises is through other premises, whether licensed or unlicensed. The licencing authority will consider whether:

- entrances and exits from parts of a building covered by one or more licences are to be separate and identifiable so that the separation of different premises is not compromised, and that people cannot 'drift' into a gambling area
- premises should be configured so that children are not invited to participate in, have accidental access to, or closely observe gambling where they are prohibited from participating and
- customers are able to participate in the principal gambling activity authorised by the premises licence.
- children can gain access to the premises
- the two establishments are compatible and
- The proposed licence holder would be able to comply with the requirements of the act, for example, mandatory operating licence conditions, and
- Gambling Commission guidance in relation to division, separation or splitting of premises and primary gambling activity (Part 7 of statutory guidance).

In addition, an overriding consideration for the licencing authority is whether, taken as a whole, the co-location of the licensed premises with other facilities has the effect of creating an arrangement that otherwise would, or should, be prohibited under the act.

1.6 Where an application is made in respect of a premises to be constructed or altered, the licencing authority will consider each application on its own merits having due regard to the advice given by the Gambling Commission in its Guidance. The licencing authority will consider:

- if a future effective date on the licence is appropriate, or
- the licence should be issued subject to a condition that trading shall not commence until the premises have been completed in all respects and in accordance with the scale plans provided with the application.

The licencing authority may require inspection of the completed works or written confirmation from the applicant, their agent or surveyor to satisfy the authority that the completed works comply with the original, or changed, plan attached to the premises licence.

1.7 **Primary gambling activity:** The licensing authority takes note of the Gambling Commission guidance that states that licensing authorities exercise care when considering applications to ensure that the primary gambling activity of the premises should be that described by the premises licence type. For example, in a bingo premises, the primary activity should be bingo, with gaming machines as an ancillary offer on the premises.

1.8 **Location:** Demand or need for licensed premises cannot be considered without regard to the location of premises. In accordance with the Gambling Commission guidance, the licencing authority will pay particular attention to the protection of children and vulnerable persons as well as issues of crime and disorder.

1.9 Should any specific policy be decided upon concerning areas where gambling premises should not be located, this policy statement will be updated. It should be noted that any such policy does not preclude any application being made and each application will be decided on its merits, with the possibility for the applicant to show how any concerns can be overcome.

1.10 **Duplication with other regulatory regimes:** The licencing authority seeks to avoid any duplication with other statutory or regulatory systems wherever possible, including planning, building control, health and safety and fire safety.

Should it come to the attention of the licencing authority that planning conditions or other regulatory restrictions or controls may impact on a premises operator's ability to comply with mandatory or default conditions, then it may alert the applicant accordingly. The grant of a gambling premises licence does not prejudice or prevent any action that may be appropriate under the law relating to planning or building.

1.11 The premises operators are normally responsible for compliance with any other statutory requirements that may apply (for example, Regulatory Reform (Fire Safety) Order 2005).

1.12 The licencing authority will seek to avoid duplication with other regulatory regimes when dealing with the licensing function. If other existing law already places certain statutory responsibilities on an employer or operator of premises, it cannot be necessary to impose the same or similar duties on the premises licence (or, in certain circumstances, permit) holder. Once the discretion of the licencing authority is engaged, it is only where additional and supplementary measures are necessary to promote the licensing objectives that necessary and proportionate conditions will be attached to a licence.

1.13 Other local authority and government policies, strategies, responsibilities, and guidance documents may also refer to the licensing function, and the licencing authority may liaise with the relevant authorities or its directorates with regard to these. While some of these may not be directly related to the promotion of the licensing objectives, they can indirectly impact upon them. For example, the licencing authority will liaise closely with local Police to ensure that the local authority can develop effective strategies that take full account of local crime and disorder issues.

1.14 It is the licencing authority's intention that it will, through its licensing committee, monitor how the matters set out in this paragraph impact on the licencing authority's licensing and other functions in order to integrate its licensing function with other relevant strategies.

The licencing authority will maintain a list of those strategies and policies with which it seeks to integrate its aims and objectives on the, [West Suffolk Council](#) website.

1.15 **Licensing objectives:** Premises licenses granted must be reasonably consistent with the licensing objectives. Regarding these objectives, the licencing authority has considered the Gambling Commission guidance and provides some commentary below:

1. **Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime:**

The Gambling Commission takes the leading role in preventing gambling from being a source of crime. Where a particular area is associated with criminal activity, the licencing authority will consider carefully whether gambling premises are suitable to be located there and whether conditions may be appropriate, for example the provision of door supervisors. There is a distinction between disorder and nuisance, and the licencing authority will consider factors such as whether police assistance was required and how threatening the behaviour was to those who could see it, so as to make that distinction. Issues of nuisance cannot be addressed when determining applications under the Gambling Act 2005.

2. **Ensuring that gambling is conducted in a fair and open way:**

The Gambling Commission stated in its guidance that it would, with the exception of tracks (see Part B section 7 of this document) generally not expect licensing authorities to be concerned with ensuring that gambling is conducted in a fair and open way, as this is addressed via operator and personal licensing requirements. If the licencing authority suspects that gambling is not being conducted in a fair and open way, then this will be brought to the attention of the Gambling Commission for its consideration.

3. **Protecting children and other vulnerable persons from being harmed or exploited by gambling:**

The Gambling Commission has stated, with limited exceptions, that the intention of the Gambling Act is that children and young persons should not be permitted to gamble and should be prevented from entering those gambling premises that are adult only environments. The objective refers to protecting children from being 'harmed or exploited' by gambling. This means preventing them from taking part in gambling activities except limited authorised activities (see schedule D), and for there to be restrictions on advertising so that gambling products are not aimed at children or advertised in such a way that makes them particularly attractive to children (excepting category D machines). Apart from bingo clubs, tracks on race-days and licensed family entertainment centres, children should not be permitted to enter licensed gambling premises.

The licensing authority will therefore consider, as suggested in the Gambling Commission guidance, whether specific measures are required at particular premises, with regard to this licensing objective. Appropriate measures may include such matters as supervision of entrances/machines or segregation of areas.

The licensing authority will also have due regard to any relevant codes of practice issued by the Gambling Commission concerning this licensing objective in relation to specific premises.

This section refers to 'vulnerable persons' but for regulatory purposes assume that this group includes people who:

- gamble more than they want to

- gamble beyond their means
- who may not be able to make informed or balanced decisions about gambling due to a mental health needs, alcohol or drugs.

The licensing authority will consider this licensing objective on a case-by-case basis.

1.16 **Conditions:** Since the licensing authority must aim to permit the use of premises for gambling, it will not attach conditions that limit the use of the premises for gambling, except where that is necessary as a result of the requirement to act:

- in accordance with the Gambling Commission guidance, the commission's codes of practice or this licensing authority's statement of policy; or
- in a way that it is reasonably consistent with the licensing objectives.

This licensing authority notes that conditions on premises licences should only relate to gambling, and it is not necessary, proportionate or appropriate to impose conditions on a premises licence where the Gambling Commission's Licence Conditions and Codes of Practice, or other legislation, places the same or similar duties, responsibilities or restrictions on an employer or the operator of gambling premises.

This licensing authority shares the view of the Gambling Commission that the mandatory and default conditions set by the Secretary of State will normally be adequate for the general good conduct of gambling premises. However, where there are specific, evidenced risks or problems associated with a particular locality, specific premises, or class of premises in its area then the licensing authority may be able to attach individual conditions to address this.

Any conditions attached by the licensing authority to a premises licence shall be:

- carefully considered in view of the matters mentioned above
- proportionate
- directly related to the premises and the type of licence applied for
- relevant to the need to make the proposed building suitable as a gambling facility
- fairly and reasonably related to the scale and type of premises, and
- reasonable in all other respects.

Sections 169 to 172 of the Act set out certain matters that may not be the subject of licensing authority conditions, as set out below:

- any condition on the premises licence which makes it impossible to comply with an operator licence condition
- conditions relating to gaming machine categories, numbers, or method of operation
- conditions which provide that membership of a club or body be required (the Gambling Act 2005 specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated); and □ conditions in relation to stakes, fees, winning or prizes.

The licensing authority will have due regard to these when considering the need for conditions.

- 1.17 The licencing authority will also consider specific measures, which may be required for buildings, that are the subject of more than one premises licence.

In considering these matters the licensing authority shall have due regard to:

- any mandatory or default conditions of licence
- any relevant codes of practice (particularly social responsibility provisions linked to operator licences) issued by the Gambling Commission, and □ Gambling Commission guidance.

Such measures may include the supervision of entrances, segregation of gambling from non-gambling areas frequented by children and the supervision of gaming machines in specific non-adult gambling premises to promote the licensing objectives.

- 1.18 The licensing authority must be satisfied that where category C or above machines are available in premises to which children are admitted:

- all such machines are located in an area of the premises that is separated from the remainder of the premises by a physical barrier that is effective to prevent access other than through a designated entrance
- only adults are admitted to the area where these machines are located
- access to the area where the machines are located is supervised
- the area where these machines are located is arranged so that it can be observed by the staff or the licence holder, and
- at the entrance to and inside any such areas there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.

These considerations may apply to premises including buildings where more than one premises licence is applicable.

- 1.19 Tracks may be subject to one, or more than one, premises licence provided each licence relates to a specified area of the track. In accordance with the Gambling Commission guidance, the licensing authority will consider the impact upon the protection of children and vulnerable adults licensing objective and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

- 1.20 In accordance with Gambling Commission guidance, the licensing authority may consider whether door supervisors are necessary and appropriate in particular circumstances in order to:

- prevent premises from becoming a source of crime or disorder, or
- protect children and vulnerable persons from being harmed or exploited by gambling.

Should the licensing authority consider that door supervisors are necessary and appropriate in the particular circumstances to promote the licensing objectives for a particular premises, it will normally expect that any person

employed as a door supervisor at that premises will either:

- meet the minimum requirements necessary for that individual to be licensed by the Security Industry Authority (SIA) in normal circumstances (accepting that there is a specific exemption for the licensing of door supervisors by the SIA for casino and bingo premises), or
- the holder of the operator licence will have recruitment criteria for their door supervisors, which may specify:
 1. a minimum training standard (whether within the organisation, or a nationally accredited training course), and
 2. an assessment of whether that individual is fit and proper, for example by means of a subject access search, Disclosure and Barring Service (DBS) basic disclosure or other means.

2. Reviews

2.1 An application for review of a premises licence may be made by:

- an interested party
- a responsible authority, and
- the licencing authority, for:
 - a particular class of premises licence, or
 - in relation to a particular premises, and
- it is for the licencing authority to determine whether the review is to be carried out.

2.2 Any request for a review should normally relate to matters relevant to one or more of the following:

- any relevant code of practice issued by the Gambling Commission
- any relevant guidance issued by the Gambling Commission
- the licencing objectives, and
- the licencing authority's statement of policy.

When considering any review request, or whether to instigate its own review, the licencing authority will have due regard to the guidance issued by the Gambling Commission and consider:

- each application on its merits
- whether matters raised in the application are frivolous or vexatious
- whether the application would cause it to amend or suspend or revoke the licence, or
- whether the request is substantially the same as any previous representations or requests made for a review or previous application for the same premises.

Officers of the authority may attempt informal mediation or dispute resolution techniques, where practicable, prior to a review being conducted.

2.3 A review application must only be determined by a subcommittee, and not by an officer. The purpose of a review is to determine whether the licencing authority should take any action in relation to the licence. The licencing authority must have regard to the principles set out in section 153 of the act, as well as any relevant representations. If action is justified, the options are

to:

- add, remove or amend a licence condition imposed by the licencing authority
- exclude a default condition imposed by the Secretary of State (relating to, for example, opening hours) or remove or amend such and exclusion
- suspend the premises licence for a period not exceeding three months, or
- revoke the premises licence.

3. Provisional statements

3.1 An applicant may apply for a full premises licence where the premises are uncompleted or unaltered (see Part B section 1.7 of this document). However, an applicant for a provisional statement does not need the right of occupation or an operator licence (granted or applied for), which are required in order to apply for a premises licence.

3.2 An application may be made to the licencing authority, under section 204 of the Act, for a provisional statement in respect of premises that the applicant expects to:

- be constructed
- be altered, or
- acquire a right to occupy.

An application may also be made for a provisional statement for premises that already have a premises licence (either for a different type of gambling or the same type).

3.3 When considering an application for a provisional statement the licencing authority shall have due regard to the guidance issued by the Gambling Commission (in particular Part 11). Subject to any necessary modifications, the process for considering an application for a provisional statement is the same as that for a premises licence, including the rights of interested parties and responsible authorities to make representations and rights of appeal.

3.4 If representations about premises licence applications following the grant of a provisional statement are received, they may not be considered unless they concern matters that could not have been addressed when determining the provisional statement, or they reflect a material change in the circumstances of the application. The licencing authority must determine the premises licence, referring only to matters:

- that could not have been raised by way of representations at the provisional statement stage
- which, in the licencing authority's opinion, reflect a change in the operator's circumstances, or
- where the premises has not been constructed in accordance with the plan and information submitted with the provisional statement application. If there are substantial changes to the plan the licencing authority will discuss any concerns with the applicant before making a decision.

3.5 In accordance with section 210 of the act (which applies to premises licences and provisional statements), the licencing authority must not have regard to

whether or not a proposal by the applicant is likely to be permitted in accordance with planning or building law.

4. Temporary use notices

- 4.1 Temporary use notices (TUN) allow the use of premises for gambling where there is no premises licence but where a licensed gambling operator wishes to use the premises for providing facilities for equal chance gaming. The Gambling Commission guidance suggests that premises that might be suitable for TUNs may include hotels, conference centres and sporting venues, and that equal chance gaming may include games such as backgammon, mah-jong, rummy, kapok, dominoes, cribbage, bingo and poker but may not be provided by means of machine.
- 4.2 There are a number of statutory limits that apply in respect of a TUN, including that a TUN may only be granted to a person or company holding a relevant operator licence, in effect a non-remote casino operating licence, and limitations on the number of times a 'set of premises' can be used under these provisions.
- 4.3 A 'set of premises', as referred to in section 218 of the act, is the subject of a TUN if any part of the premises is the subject of a notice. This reference to 'premises' is not the same as that in Part 8 of the Act and prevents one large premises from serving a TUN for different parts of the premises and exceeding the statutory limit of 21 days in any 12-month period.
- 4.4 The licencing authority will take into account Gambling Commission guidance when considering whether a place falls within the definition of a 'set of premises'. This consideration may include looking at the ownership, occupation and control of the premises. The Gambling Commission guidance advises that: "This is a new permission and licensing authorities should be ready to object to notices where it appears that their effect would be to permit regular gambling in a place that could be described as one set of premises."
- 4.5 Where a notice of objection is received in respect of a temporary use notice, the licensing authority will hold a hearing and consider representations from:
- the person who gave the notice
 - any person who objected to the notice, and
 - any party who was entitled to receive a copy of the temporary use notice.
- Where all parties agree that a hearing is unnecessary, the hearing may be dispensed with.
- 4.6 Where objections are made, a modification to the TUN may be proposed, which could include:
- a reduction in the number of days when gambling occurs
 - a restriction on the type of gambling which may take place.
- 4.7 Where, following a hearing, or after a hearing has been dispensed with, the licensing authority considers that the temporary use notice should not have effect, it must issue a counter notice that may:
- prevent the temporary use notice from taking effect

- limit the activities that are permitted
- limit the time period of the gambling
- allow the activity to take place subject to a specified condition.

4.8 The principles that the licensing authority will apply in determining a TUN are those which it will apply when determining a premises licence, as set out at part B, General principles, subject to its view as to whether it accords with a:

- commission code
- the guidance issued by the Gambling Commission
- this licensing authority's statement of licensing policy, and
- is reasonably consistent with the licensing objectives.

5. Occasional use notices

5.1 Occasional use notices (OUN) permit licensed betting operators (with appropriate permission from the Gambling Commission) to use tracks for short periods for conducting betting, where the event upon which the betting is taking place is of a temporary, infrequent nature. The OUN dispenses with the need for a betting premises licence for the track in these circumstances.

5.2 The OUN must be served by a person who is responsible for the administration of events on the track or by an occupier of the track.

5.3 The licencing authority must ensure that the statutory limit of eight days in a calendar year is not exceeded. The licencing authority must consider the definition of a 'track', which need not be a permanent fixture, and whether the applicant is eligible to serve the notice.

6. Casinos

6.1 This licencing authority has not passed a 'no casino' resolution under Section 166 of the Gambling Act 2005 but retains the power to do so. Any change will be published on the council website and the statement of principles in the intervening period.

6.2 Where a licencing authority area has the power to determine a premises licence application for a new style casino, it will do so following any regulations under Section 175 of the Gambling Act 2005 published by the Secretary of State.

6.3 The act lays down a framework for a two-stage process for considering applications in circumstances where the number of applications exceeds the number of licences available, and this will be followed by the licencing authority.

6.4 **Licence considerations and conditions:** The licencing authority shall have due regard to the Gambling Commission guidance in relation to the suitability and layout of casino premises, and also the guidance issued by the commission on primary gambling activity at casino premises.

6.5 **Betting machines:** Where betting is permitted in a casino, the licencing authority will normally, in accordance with the Gambling Commission guidance and when considering whether to impose a condition to restrict the number, nature and circumstances of betting machines (bet receipt terminals) made

available in particular premises, take into account:

- the size of the premises
- the number of counter positions available for person-to-person transactions
- and the ability of staff to monitor the use of the machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable persons.

7. Bingo premises

7.1 If children are allowed to enter premises licensed for bingo, it is important that they do not participate in gambling, other than on category D machines. Where category B or C machines are made available for use on premises to which children are admitted Licensing Authorities should ensure that:

- all such machines are located in an area of the premises separate from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance, and
- only adults are admitted to the area where the machines are located.

7.2 The licencing authority shall have due regard to relevant licence conditions and codes of practice in relation to the operation of Bingo premises, and also the Gambling Commission's guidance about the particular issues that licensing authorities should take into account in relation to the suitability and layout of bingo premises. This includes guidance on primary gambling activity, split premises and operating licence conditions.

8. Betting premises

8.1 **Betting machines:** the licencing authority will normally, in accordance with the Gambling Commission guidance, take into account:

- the size of the premises
- the number of counter positions available for person-to-person transactions, and
- the ability of staff to monitor the use of the machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people.

Children and young persons will not be able to enter premises which hold a betting premises licence, unless the special rules applying to tracks are applicable.

8.2 The licencing authority shall have due regard to the Gambling Commission's guidance in relation to the suitability and layout of betting premises. This includes guidance on primary gambling activity, split premises and operating licence conditions.

8.3 Betting machines (bet receipt terminals) are not gaming machines under the Act, and do not accrue against the premises entitlement for gaming machines. This is **unless** the machine is designed or adapted for use to bet on **virtual** races (that is, images generated by computer to resemble races or other events), in which case it is considered a gaming machine. Where betting facilities are provided only by betting machines the number of betting

machines must exceed the number of gaming machines made available for use.

9. Tracks

9.1 Tracks are defined under the act as “a horse race course, greyhound track or other premises on any part of which a race or other sporting event takes place or is intended to take place”, which include:

- a point-to-point horse race meeting
- football, cricket and rugby grounds
- an athletics stadium
- a golf course
- venues hosting darts, bowls or snooker tournaments
- premises staging boxing matches
- sections of river hosting a fishing competition
- a motor racing event.

This list is not exhaustive but gives an example of the types of venue which could accommodate the provision of betting facilities.

9.2 There are three types of authorisation under which betting facilities may be made available at a sporting event:

- an ‘occasional use notice’
- a ‘temporary use notice’ and
- a track premises licence.

Betting in relation to tracks may be provided either as on course or off course betting. The different types of betting are explained in detail in the guidance issued by the Gambling Commission, and an up to date excerpt of this guidance is published on the [Gambling Commission website](#)

9.3 A betting premises licence permits premises to be used for the provision for betting, whether by:

- making or accepting bets
- acting as a betting intermediary, or
- providing other facilities for the making or accepting of bets.

9.4 Tracks are the only class of premises that may be subject to more than one premises licence, provided that each licence relates to a specific area of the track. This allows track venues to develop leisure facilities, such as a casino, and apply for an appropriate premises licence for that part of the track.

9.5 There is no special class of betting premises licence for a track, but the act does contain rules that apply specifically to premises licences granted in respect of tracks.

9.6 Special rules apply to applicants for a premises licence in relation to a track. Most importantly the applicant need not hold an operator licence. That is because, unless the occupier of the track wishes to offer pool betting (or general betting) facilities themselves (for which they will need a licence) the betting that is provided upon the track will not be provided by the occupier. Instead, it will be provided by other operators who come on-course. Since

those people will require the necessary operator licences, the act allows the track operator to obtain a premises licence without also having to hold an operator licence. This track premises licence then authorises anyone upon the premises with a valid operator licence to offer betting facilities.

- 9.7 Track premises licences are distinguished from all other premises licences because children and young persons are allowed to be present on the track while betting is taking place on those licensed premises.
- 9.8 Track premises that safeguard the achievement of the three licensing objectives may generally be considered fit for gambling, and some general principles hereby licensing authorities can establish whether a track is fit for the provision of gambling facilities are, as follows:

Licensing objective: The protection of children and other vulnerable persons from being harmed or exploited by gambling

Issues to consider	Reason to consider a track premises unfit for gambling purposes?
Tracks permit access to children.	No - children are allowed access to tracks on race days.
Bet receipt terminals in areas where there is no supervision which would allow children or young persons to use machines undetected.	No - It is a mandatory condition of the operating licence that operators ensure that bet receipt terminals are supervised. This is not an issue for the premises licence.
Children are allowed access to areas holding category B and C gaming machines.	It is a mandatory condition of the operating licence that operators ensure that children are not allowed access to areas where category B and C gaming machines are provided. However, section 182 of the act also creates a premises licence condition that children and young persons must be excluded from areas where any gaming machines other than category D are located.
Betting areas adjacent to areas where children or young persons are present such as play areas.	No - children are allowed access to tracks on race days and so will be exposed to gambling areas. It is a mandatory condition of the operating licence that operators do not accept bets from children or young persons.
Betting areas adjacent to areas where children/young persons are present such as play areas	The commission considers that the location of betting does not generally pose a risk to this licensing objective. Licensing authorities may impose their own local conditions where they perceive problems.

Licensing objective: Ensure gambling is conducted in a fair and open way

Issues to consider	Reason to consider a track premises unfit for gambling purposes?
The rules of betting are not displayed on the premises.	No (not an issue at application stage) - it is a mandatory condition of the premises licence that the rules of betting are displayed.
Unlicensed betting operators are allowed to operate on tracks.	No (not an issue at application stage) - it is a mandatory condition of the premises licence that licence holders make arrangements to ensure that they only allow licensed operators on track.
Betting takes place out of approved hours.	No (not an issue at application stage) - it is a mandatory condition of the premises licence that betting only takes place within the specified hours.

Licensing objective: Prevent gambling from being a source of crime and disorder

Issues to consider	Reason to consider a track premises unfit for gambling purposes?
Betting is allowed in all parts of a track resulting in greater difficulties for track premises licence holders to identify instances of illegal betting.	No - the Commission's view is that this does not generally pose a risk to this objective. Licensing authorities may impose their own conditions should they perceive a problem.
No formal exit/entry points allowing easy access for unapproved operators and customers.	No - the commission's view is that this does not generally pose a risk to this objective. Licensing authorities may impose their own conditions should they perceive a problem.

The licencing authority will take any such guidance into consideration when determining an application for a track premises licence.

9.9 **Access to premises and other parts of the track:** Access between premises licensed for gambling and non-gambling areas is an important local licensing consideration, for reasons such as the following:

- to prevent operators from seeking to circumvent the Act by artificially subdividing a premises and securing separate premises licences for its composite parts
- to ensure that operators do not circumvent regulations governing the maximum number of gaming machines applicable to specific premises
- to ensure that people who have entered a premises for one type of gambling are not exposed to another, potentially harder, form of gambling

- to ensure that there is no direct access between gambling premises to which children have access and those which they are prohibited from entering
- to ensure that all gambling premises have publicly accessible entrances, and
- to ensure that gambling premises are not developed in the backrooms of other commercial premises.

9.10 **Access by children – special dispensation for tracks:** The act forbids all persons under 18 years old to enter premises when betting facilities are being provided, other than at tracks. This dispensation allows families to attend premises such as greyhound tracks or racecourses on event days, and children to be permitted into areas where betting facilities are provided, such as the betting ring, where betting takes place. This dispensation does not, however, apply to:

- areas within a track where category C or above machines are provided, or
- other premises to which under 18-year-olds are specifically not permitted access.

Licensed betting operators at tracks are bound by their operating licence conditions, which prevent them from accepting bets from persons who are under 18 years old. The track premises licence holder is also required through premises licence conditions to display a notice in a prominent place at every public entrance stating that no person under the age of 18 is permitted to bet on the premises.

There may be some specific considerations regarding the protection of children and vulnerable persons from being harmed or exploited by gambling - that is, the need to ensure entrances to each type of premises are distinct and that children are excluded from gambling or betting areas where they are not permitted to enter.

Children and young persons will by law be permitted to enter track areas where facilities for betting are provided on days when dog racing and/or horse racing takes place, although they are still prevented from entering areas where gaming machines (other than category D machines) are provided. The licencing authority will normally expect premises licence applicants to demonstrate suitable measures to ensure the children do not have access to adult only gambling facilities.

Appropriate measures may include:

- proof of age schemes
- CCTV
- door supervisors
- supervision of entrances or machine areas
- physical separation of areas
- location of entry
- notices or signage
- specific opening hours
- the location of gaming machines
- self-barring schemes

- provision of information leaflets or helpline numbers for organisations such as GamCare or Gamble Aware.

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

- 9.11 **Betting on event and non-event days:** Premises licence holders will be expected to comply with the mandatory and default conditions applicable to them on both event and non-event days. The licensing authority will not generally expect to re-assess a licence application because of a change to the dates of sporting events but would expect applicants and licence holders to make information about sporting fixtures available as part of the application.

Significant changes to the fixture or events listing have a bearing on the licence conditions. This is because track premises licence holders will be expected to comply with the mandatory and default conditions applicable to them on both event and non-event days.

On days when no public sporting event is taking place on a track, gambling facilities may only be provided on the track between the hours of 7am and 10pm. Where the premises user intends to continue to offer facilities for gambling outside the proposed gambling hours on non-event days these facilities should be provided by virtue of an occasional use notice.

On non-event days, tracks become similar to licensed betting offices on the high street. Tracks may achieve this requirement by:

- locating all betting areas inside an area of the premises that is separated from the remainder of the premises by a physical barrier, thereby preventing access other than through a designated entrance
- only admitting adults to the part of the track where betting areas are located, by establishing procedures for verifying customer ages and refusing entry to adult-only areas for those unable to produce an acceptable form of identification (and taking action where there are unlawful attempts to enter adult-only areas), and
- placing prominent notices in front of and inside each entrance stating that access to the area is prohibited to persons under 18.

The licensing authority may consider reducing the default gambling hours, providing any reduction is in line with the principles set out in section 153 of the act.

- 9.12. **Bet receipt terminals:** Licensed operators may install bet receipt terminals on tracks. There is no restriction on the number of bet receipt terminals that may be in use, but operators must, by virtue of their operating licence conditions, supervise such terminals to prevent them being used by those under 18 years of age.

There is no formal requirement on track premises licence holders to involve themselves in the procedures used by betting operators to supervise their bet receipt terminals. However, this is unless specific local conditions stipulating supervisory arrangements are added to the track premises licence by the licensing authority terminals.

- 9.13 **Gaming machines:** A track premises licence does not in itself entitle the holder to provide gaming machines, as this type of premises licence can be held without any corresponding operating licence.

Where a track owner holds both a track premises licence and a pool betting operating licence issued by the commission (in effect, greyhound tracks only), they may site up to four gaming machines within categories B2 to D on the track.

Some tracks may also hold a premises licence under the Licensing Act 2003. As such they will be automatically entitled under section 282 of the act to two gaming machines of category C or D.

In such scenarios the operating licence entitlement does not take precedence, and each licence has its own requirements that must be complied with.

Applications for permits to allow additional gaming machines are not permitted where the premises is already covered by a track premises licence.

It is a condition of section 282 of the act that alcohol-licensed premises licence holders (not necessarily the owners) must comply with any relevant provision of a code of practice under section 24 about the location and operation of a gaming machine. The gaming machine permits code of practice can be found on the commission's website.

Where track premises licence holders possess a pool betting operating licence, the commission places a mandatory licence condition on such operators that they must:

- have and put into effect documented policies and procedures to prevent underage gambling, and
- monitor the effectiveness of these.

- 9.14 **Administration of betting:** Administrative and quasi-regulatory arrangements in place to ensure that activities held on tracks run smoothly for paying customers, track operators and betting operators are considered to be outside the remit of the act unless they affect the licensing objectives.

- 9.15 **The role of track premises licence holders:** The responsibilities of track premises licence holders are established by the mandatory and default licence conditions attaching to their premises licence.

The licensed betting operators authorised by track owners to provide betting facilities at tracks must comply with their operating licence conditions and codes of practice issued by the commission.

Track premises licence holders have a responsibility to report regulatory breaches or potential breaches relating to the premises itself or to betting operators.

- 9.16 **Acceptance of bets:** Track premises licences for greyhound tracks and racecourses are subject to mandatory licence conditions requiring access to be offered at the track-side to betting operators generally. This prevents track premises licence holders who are also pool betting operators from becoming a monopoly supplier of betting on tracks.

While this does not mean that there must be independent betting operators on tracks on event days, track premises licence holders cannot hold event days without at least making places available to licensed operators. This matter is the responsibility of the Gambling Commission and not the licencing authority.

- 9.17 **Pool betting:** Under the act, holders of track premises licences on licensed greyhound tracks are given exclusivity to offer pool betting facilities on greyhound racing.

They may also authorise other people to conduct such pool betting on their behalf, although in all cases a relevant operating licence will be required to license this activity.

A totalisator on a licensed greyhound track will only be permitted while the public are admitted to the track for the purpose of attending greyhound races, and no other sporting events are taking place. A mandatory condition is attached to the premises licence to this effect.

- 9.18 **Admission of betting operators:** It is a mandatory premises licence condition of track premises licences that the licence holder makes arrangements to ensure that the betting operators they admit to their track operate under valid operating licences.

Track premises licence holders are responsible for determining their own arrangements for the verification of betting operators. As part of this process, the track premises licence holder should make arrangements for ensuring that the betting operator holds an operating licence. Additionally, both parties should agree a procedure for assessing that persons accepting bets on behalf of a betting operator either themselves hold operating licences in their own right, or are employed by the operator under a written contract of employment.

- 9.19 **Removal of illegal betting operators:** Track premises licence holders are required by a mandatory licence condition to take reasonable steps to remove from the racecourse anybody found to be providing facilities for gambling without authorisation. Failure to uphold this requirement could result in action being taken against the premises licence holder.

Track premises licence holders are not expected to have proactive policies and procedures for identifying illegal gambling other than the mandatory requirement to verify that betting operators offering betting facilities on their track hold suitable operating licences.

- 9.20 **Display of rules:** It is a mandatory condition of premises licences that clear and accessible information about the terms on which a bet may be placed must be displayed at betting premises, including tracks.

The track premises licence holder should make the necessary arrangements to ensure that betting rules are accessible to all customers, regardless of which area of the track they are in. If certain areas are restricted to certain customers (such as different stands within a football ground), then rules could be displayed at various parts of the track. Other measures could be taken to ensure that they are made available to the public, such as printing them in the race-card or programme. The requirement could also be met by making a copy

of the rules available in leaflet form from the main track office, and customers could be given a copy if they request one.

Betting operators offering betting facilities on racecourses and at greyhound tracks are required through the conditions of their operating licence to clearly display any of their own rules that differ from those that the track premises licence holder elects to display, and their rules concerning voids, late bets, and maximum payouts. For racecourses and greyhound tracks, the maximum payout will vary according to the rules of individual on-course operators.

9.21 **Approved betting areas:** In considering applications, the licensing authority will take into account the licensing objectives and assess whether these objectives are compromised by proposed betting arrangements. The location of betting areas (other than those for gaming machines and bet receipt terminals) is not considered a threat to the licensing objectives and therefore no additional conditions would normally be imposed by licensing authorities, unless the circumstances are such that the licensing authority considers that the licensing objectives would be undermined.

9.22 **Multiple licences:** The act permits a licencing authority to issue more than one premises licence for a track provided that each licence relates to a distinct specified area of the track (although there cannot be more than one premises licence covering the same area of the track.)

This enables track owners to extend existing facilities to provide other gambling facilities such as a casino on their existing tracks, whereby these additional gambling activities are covered by separate premises licences. Where an application is made for an additional premises licence, the licencing authority will consider the following matters when determining an application access issues in particular whether access to the desired premises will be allowed directly from the track. Direct access between a track and other betting premises (other than a track betting shop) is not permitted. The track owner would need to make arrangements so that access to a casino or bingo hall would be via a street, not via the track itself.

Where a particular area of a track is already subject to a premises licence, and a person wishes to apply for a licence to offer another type of activity in that area, an application must be made to the licensing authority to vary the original premises licence. The new track premises licence can only be granted at the same time as, or after, the original licence has been varied.

Where the licensing authority receives an application indicating separate betting areas that may not necessarily have clear physical boundaries, such as walls or fencing, it may grant the licence where it is satisfied that the area is clearly delineated, both in terms of making it clear to the public that they are entering a 'betting office', and to keep out persons aged under 18. Where the licensing authority is not satisfied that a new activity in an existing area is clearly delineated, it may consider refusing the application.

9.23 **Social responsibility considerations for tracks:** The Act places a condition on the track premises licence that the licensee shall ensure that children and young persons are excluded from any area where facilities for betting are provided (unless on race days at racetracks and at greyhound tracks).

10. Adult gaming centre's

- 10.1 The licencing authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will require applicants to demonstrate that there will be sufficient measures to ensure that under 18-year-olds do not have access to the premises.

Appropriate measures may also be included within mandatory or default conditions, codes of practice and cover matters such as:

- proof of age schemes
- CCTV
- supervision of entrances or machine areas
- physical separation of areas
- access and Location of entry
- notices or signage
- self-barring schemes
- ATM locations
- prohibition of alcohol consumption
- provision of information leaflets/helpline numbers for organisations such as GamCare or Gamble Aware.

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

The licencing authority may determine the opening hours for adult gaming centres, on a case-by-case basis, in the absence of any default conditions addressing this matter.

11. (Licensed) family entertainment centre's

- 11.1 The licencing authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will require applicants to demonstrate that there will be sufficient measures to ensure that under 18-year-olds do not have access to the adult only Category C gaming machine areas.

The licencing authority will require applicants to demonstrate that there will be sufficient measures to promote the licensing objectives. Appropriate measures may also be included within mandatory or default conditions, codes of practice and cover issues such as:

- CCTV
- supervision of entrances or machine areas
- physical separation of areas
- access and Location of entry
- notices or signage
- challenging children or young person's attempting to play Category C machines
- self-barring schemes
- ATM location
- prohibition of alcohol consumption
- provision of information leaflets/helpline numbers for organisations such as GamCare or Gamble Aware

- measures or training for staff on how to deal with suspected truant school children on the premises.

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

The licencing authority may determine the opening hours for licensed FEC's, on a case-by-case basis, in the absence of any default conditions addressing this matter.

- 11.2 The licencing authority will, in accordance with the Gambling Commission guidance, make itself aware of any conditions that may apply to operator licenses covering the way in which the area containing the category C machines should be delineated. The licencing authority will ensure that it has due regard to any mandatory or default conditions on these premises licenses, codes of practice and guidance issued by the Gambling Commission when dispending its functions in relation to licensed family entertainment centres.

Part C. Permits, temporary use notices and occasional use notices

1. Unlicensed family entertainment centre (unlicensed FEC's) gaming machine permits

- 1.1 Unlicensed family entertainment centres (FEC's) are commonly located at seaside resorts, in airports and at motorway service stations, catering for families - including unaccompanied children and young persons. Where a premises does not hold a Premises Licence but there is an intention to provide gaming machines (category D only), an application may be made to the licencing authority for the grant of this permit. The applicant must be an individual aged 18 or over, and he or she must occupy or plan to occupy the relevant premises. The licencing authority may only grant a permit where it is satisfied that the applicant intends to use the premises as an unlicensed FEC and where it has consulted the Chief Officer of Police on the application. Any duties on the applicant to comply with other legislation such as fire regulations or health and safety are not issues for the licencing authority under the Gambling Act 2005.
- 1.2 If the operator of a family entertainment centre intends to make category C machines available, in addition to category D machines, then an application must be made for an operator licence from the Gambling Commission and a premises licence from the licencing authority.
- 1.3 Details of up to date application requirements, including any supporting documentation, are made available on the council website at: [West Suffolk Council – Gambling and lotteries](#)
- 1.4 It should be noted that a licencing authority cannot attach conditions to this type of permit.
- 1.5 **Statement of principles:** The licencing authority will expect the applicant to satisfy it that that they and their employees can demonstrate a full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FEC's. The applicant is expected to demonstrate that he has considered appropriate measures to promote the licensing objectives, and training for staff on issues such as:
- suspected truant school children on the premises
 - how staff would deal with unsupervised very young children being on the premises
 - children causing problems on or around the premises, and
 - maximum stakes and prizes of the gambling that is permissible in unlicensed FEC's.
- This list is not mandatory, nor exhaustive, and is merely indicative of example measures.
- 1.6 The Chief Officer of Police is a statutory consultee for all such permit applications, and any representations made by him/her will be considered by the licencing authority.

- 1.7 The licencing authority may also require the applicant to provide details of any relevant convictions, (those that are set out in Schedule 7 of the Act); the following documents will be accepted:
- basic Disclosure and Barring Service disclosure, or
 - a police subject access search.

2. Club gaming permits

- 2.1 Members clubs and miners' welfare institutes (but not commercial clubs) may apply for a club gaming permit which authorises the premises to:
- make available for use up to three gaming machines of categories B3A to D
 - equal chance gaming (without restriction on the stakes and prizes), and
 - games of chance as prescribed by regulations (namely pontoon and Chemin de Fer.

The gaming which a club gaming permit allows is subject to the following conditions:

1. In respect of equal chance gaming:
 - the club must not deduct money from sums staked or won
 - the participation fee must not exceed the amount prescribed in regulations
 - the game takes place on the premises and must not be linked with a game on another set of premises. Two games are linked if the result of one game is, or may be, wholly or partly determined by reference to the result of the other game
 - the amount of winnings available in one game is wholly or partly determined by reference to the amount of participation in the other game, and a game which is split so that part is played on one site and another part is played elsewhere is treated as two linked games
 - only club members and their genuine guests participate.
2. In respect of other games of chance:
 - the game must be Pontoon and Chemin de Fer only
 - no participation fee may be charged otherwise than in accordance with the regulations
 - no amount may be deducted from sums staked or won otherwise than in accordance with the regulations.

- 2.2 Members clubs must have at least 25 members and be established and conducted 'wholly or mainly' for purposes other than gaming, unless the gaming is permitted by separate regulations. The Secretary of State has made such regulations covering bridge and whist clubs. A members' club must be permanent in nature and established and conducted for the benefit of its members and not as a commercial enterprise. Examples include working men's clubs, branches of Royal British Legion and clubs with political affiliations.

A club gaming permit may not be granted in respect of a vehicle or a vessel.

2.3 The licencing authority may only refuse an application on the grounds that:

1. the applicant does not fulfil the requirements for a members' club or miners' welfare institute and therefore is not entitled to receive the type of permit for which it has applied
2. the applicant's premises are used wholly or mainly by children and/or young persons
3. an offence under the act or a breach of a permit has been committed by the applicant while providing gaming facilities
4. a permit held by the applicant has been cancelled in the previous ten years, or
5. an objection has been lodged by the Gambling Commission or the Suffolk Constabulary.

Where the licencing authority is satisfied that point 1 or point 2 above is the case, it must refuse the application. In determining an application, the licencing authority shall have regard to the relevant guidance issued by the Gambling Commission and, subject to that guidance, the licensing objectives.

Where a permit is granted, the permit holder must comply with statutory conditions:

- no child or young person may use a category B or C machine on the premises; and
- the permit holder must comply with any relevant provision of a code of practice regarding the location and operation of gaming machines.

Clubs do not have to have a permanent premises or alcohol licence.

There is a 'fast-track' procedure available for premises where the club holds a club premises certificate under section 72 of the Licensing Act 2003. Where an application is made under the fast-track procedure, there is no opportunity for objections to be made by the commission or the Suffolk Constabulary, and the grounds upon which an authority can refuse a permit are limited as below:

1. the club is established primarily for gaming, other than gaming of a prescribed kind
2. in addition to the prescribed gaming, the applicant provides facilities for other gaming, or
3. a club gaming permit or club machine permit issued to the applicant in the last ten years has been cancelled.

2.4 There are statutory conditions concerning club gaming permits.

3. Club machine permits

3.1 Members clubs and miners' welfare institutes and commercial clubs may apply for a club machine permit, which enables the premises to make available for use up to three gaming machines of categories B (sub-categories 3A and 4), C and D. Members clubs and Miner's welfare institutes only may also make available for use category B3A machines offering lottery games in the club under a club machine permit.

3.2 Members clubs must have at least 25 members and be established and conducted 'wholly or mainly' for purposes other than gaming, unless the gaming is permitted by separate regulations. The Secretary of State has made

such regulations covering bridge and whist clubs. A members' club must be permanent in nature and established and conducted for the benefit of its members and not as a commercial enterprise. Examples include working men's clubs, branches of Royal British Legion and clubs with political affiliations.

3.3 Commercial clubs must have at least 25 members but may be established with a view to making a profit, which is not returned to the members, but the proprietor(s) of the club. Examples of commercial clubs include snooker clubs, clubs established for personal profit and most clubs established as private companies.

3.4 The Gambling Commission guidance advises that licensing authorities may only refuse an application on the grounds that:

- the applicant does not fulfil the requirements for a members' or commercial club or miners' welfare institute and therefore is not entitled to receive the type of permit for which it has applied
- the applicant's premises are used wholly or mainly by children and/or young persons
- an offence under the act or a breach of a permit has been committed by the applicant while providing gaming facilities
- a permit held by the applicant has been cancelled in the previous ten years, or
- an objection has been lodged by the Gambling Commission or the Police

It should be noted that either type of permit may not be issued in respect of a vessel or vehicle.

3.5 There is also a 'fast-track' procedure available for premises where the club holds a club premises certificate under section 72 of the Licensing Act 2003. As the Gambling Commission guidance states: "Under the fast-track procedure there is no opportunity for an objection to be made by the commission or the Police, and the grounds upon which an authority can refuse a permit are reduced". The grounds on which an application under the process may be refused are that:

- the club is established primarily for gaming, other than gaming of a prescribed kind
- in addition to the prescribed gaming, the applicant provides facilities for other gaming, or
- a club machine permit issued to the applicant in the last ten years has been cancelled.

3.6 There are statutory conditions concerning club machine permits that no child or young person may use a category B or C machine on the premises and that the permit holder complies with any relevant provision of a code of practice regarding the location and operation of gaming machines.

4. (Alcohol) licensed premises gaming machine permits

4.1 The act makes provision for premises licensed to sell alcohol for general consumption on the premises to be entitled to make available up to two gaming machines, of categories C and/or D. The Licensing Act 2003 premises licence holder needs only to notify the licencing authority of this intention and

pay the prescribed fee. The licencing authority may remove the automatic authorisation in respect of any particular premises only if it is satisfied that:

- provision of the machines is not reasonably consistent with the pursuit of the licensing objectives
- gaming has taken place on the premises that breaches a condition of section 282 of the gambling act (that is, that written notice has been provided to the licencing authority, that a fee has been provided and that any relevant code of practice issued by the Gambling Commission about the location and operation of the machine has been complied with)
- the premises are mainly used for gaming, or
- an offence under the gambling act has been committed on the premises.

Before making any such order the licencing authority shall give the licensee at least 21 days prior notice and consider any representations made by the applicant (at a hearing if requested by the licence holder).

4.2 If a Licensing Act 2003 premises licence holder wishes to use more than two gaming machines, then (s) he will need to apply to the licencing authority for a permit and the licencing authority must consider that application based upon:

- the licensing objectives
- any guidance issued by the Gambling Commission, and
- 'such matters' as they think relevant.

This licencing authority considers that 'such matters' will be assessed on a case-by-case basis. Generally, there will be regard to the need to protect children and vulnerable persons from harm or being exploited by gambling.

This permit replaces, and is not in addition, to the automatic entitlement notification.

4.3 The licencing authority expect the applicant to satisfy the authority it that there will be sufficient measures in place to ensure that persons under the age of 18-year-olds do not have access to the adult only category C gaming machines. The applicant may consider appropriate measures to comply with the Gambling Commission's Code of Practice and monitor access to machines. This may include:

- ensuring that the adult gaming machines are within sight of the bar, or within the sight of staff who can monitor that the machines are not being used by persons under the age of 18
- notices and signage may also be an appropriate measure or safeguard, and
- or the provision of information leaflets or helpline numbers for organisations that give support to vulnerable persons such as GamCare and Gamble Aware.

4.4 The holder of a permit must comply with any code of practice issued under section 24 of the act by the Gambling Commission about the location and operation of the gaming machines.

4.5 It should be noted that the licencing authority can and may decide to grant the application with a smaller number of machines and/or a different category of

machines than that applied for. Conditions (other than these) cannot be attached to the grant of this permit.

There is a similar mechanism for applying to vary the number and category of machines specified on an existing permit.

5. Prize gaming and prize gaming permits

5.1 **Statement of principles:** The prize gaming conditions in the act are:

- the limits on participation fees, as set out in regulations, must be complied with
- all chances to participate in the gaming must be allocated on the premises on which the gaming is taking place and on one day; the game must be played and completed on the day the chances are allocated; and the result of the game must be made public in the premises on the day that it is played
- the prize for which the game is played must not exceed the amount set out in regulations (if a monetary prize), or the prescribed value (if nonmonetary prize), and
- participation in the gaming must not entitle the player to take part in any other gambling.

It should be also noted that this permit cannot be issued in respect of a vessel or vehicle.

An application may only be made by an individual over the age of 18, who occupies or plans to occupy the relevant premises. An application for a permit cannot be made if a premises licence or club gaming permit is already in effect for the same premises.

5.2 The licencing authority will expect the applicant to satisfy the authority that that they and their employees can demonstrate a full understanding of the maximum stakes and prizes for the gaming offered and that the type of gaming offered is within the law. The applicant will normally be required to set out the types of gaming that he or she is intending to offer, and may wish to consider appropriate measures to promote the licensing objectives, and training for staff on:

- the type of gaming which they intend to provide
- the stakes and prizes which apply under the regulations relevant to the type of gaming they intend to offer.

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

5.3 In making its decision on an application for this permit the licencing authority may have regard to the licensing objectives and must have regard to any Gambling Commission guidance. Given that the premises may be particularly appealing to children and young persons, the licencing authority will give appropriate weight to the consideration of child protection issues.

5.4 The Chief Officer of Police is a statutory consultee for all such permit applications. Any representations made by the Chief Officer of Police which are

relevant to the licensing objectives will be considered by the licencing authority relevant considerations may include:

- whether the applicant has any convictions that would render them unsuitable to operate prize gaming, or
- the suitability of the location of the premises in relation to any disorder issues.

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

- 5.5 It should be noted that whilst there may be conditions in the Gambling Act 2005 and Gambling Commission codes of practice (including on social responsibility) with which the permit holder must comply, the licencing authority cannot attach conditions to this permit. Where the authority is minded to refuse a permit application it will notify the applicant and allow the opportunity for the applicant to make representations (which may be considered at a hearing).

6. Travelling fairs

- 6.1 It is the duty of the licensing authority to decide whether, where category D machines and/or equal chance prize gaming without a permit are made available for use at travelling fairs, the statutory requirement that the facilities for gambling amount to no more than an ancillary amusement at the fair is met.
- 6.2 The licensing authority will carefully consider whether an operator falls within the statutory definition of a travelling fair (provided by section 286 of the act) and be 'wholly or principally' providing amusements.
- 6.3 The 27-day statutory maximum for the land being used as a fair is per calendar year, and this applies to the piece of land on which the fairs are held regardless of whether it is the same or different travelling fairs occupying the land. The licensing authority shall endeavour to work with neighbouring authorities to ensure that land which crosses district or borough boundaries is monitored so that the statutory limits are not exceeded.

7. Society lotteries

- 7.1 The council as the local authority is responsible for registering small society lotteries. A lottery is defined under the act and in the guidance as:

A simple lottery if:

- persons are required to pay to participate
- one or more prizes are allocated to one or more members of a class
- the prizes are allocated by a process which relies wholly on chance.

A complex lottery if:

- persons are required to pay to participate
- one or more prizes are allocated to one or more members of a class
- the prizes are allocated by a series of processes

- the first of those processes relies wholly on chance.

A society, or any separate branch of such a society, may be registered by the council to promote a small lottery where it is established and conducted:

- for charitable purposes
- for the purpose of enabling participation in, or of supporting, sport, athletics or a cultural activity
- for any other non-commercial purpose other than private gain and the proceeds of the lottery must be devoted to the purposes above. The society must not be established for the sole purpose of facilitating lotteries.

A small lottery is defined in the act and the current limits are published on the council website at [West Suffolk Council – Small society lotteries](#). Definitions of exempt lotteries are also published at the above address.

The council may only register a society which wishes to promote a small lottery where the society's principal office is located within its area. If the council believes that the society's principal office does not fall within its boundaries it will inform the society and relevant authority at the earliest opportunity.

The council will expect the society applying to supply a copy of its terms conditions or constitution to enable the council to establish that the society is non-commercial, together with a declaration to the effect that it is non-commercial.

Registration of small society lotteries is a function which the council has delegated to officers.

Details of societies registered by the council will be published in a register maintained by the council.

The registration is for an indefinite period unless the registration is cancelled by:

- the society, or
- the council on failure of the society to pay the annual charge.

The council may refuse to register a small society lottery where:

- an operating licence held by the applicant for registration has been revoked or an application for an operating licence made by the applicant for registration has been refused
- the society cannot be deemed non-commercial
- a person who will or may be connected with the promotion of the lottery has been convicted of a relevant offence
- information provided in or with the application for registration is found to be false or misleading.

Where the council proposes to refuse to register a small society lottery it will give the society an opportunity to make representations in writing or at a hearing. The council will notify the society in writing of the outcome of the

hearing and the reasons for the decision.

The council may revoke a society lottery registration where it considers that it would have had to or would be entitled to refuse an application if it were to be made at that time.

Schedule A

Gambling Act 2005 Statement of Licensing Principles: consultee list

(Please note this is not exhaustive)

- ADFAM Families Drugs and Alcohol
- Adult and Community Services (Suffolk County Council)
- Age Concern Suffolk
- Alcoholics Anonymous
- Association of British Bookmakers
- BACTA
- Bingo Association
- British Beer & Pub Association (BBPA)
- British Casino Association
- British Casino Association
- British Greyhound Racing Board
- British Horseracing Board
- Chilvers Automatics Ltd
- Citizens Advice Bureau
- Community Development Youth Worker
- Corals
- Done Brothers Ltd
- East of England Faiths Council
- Environmental Services
- Essex Leisure
- Gamblers Anonymous
- Gambling Commission
- GamCare
- Gamestec Leisure Ltd
- Gordon House Association
- Help the Aged
- Horserace Totalisator Board
- Horseracing Betting Levy Board
- Independent Betting Arbitration Service
- JBR Leisure Ltd
- Jockey Club
- Joe Jennings Ltd
- Ladbrokes PLC
- Learning Disability Partnership Board
- Leisure Link
- Narcotics Anonymous
- National Greyhound Racing Club Ltd
- National Stud
- National Youth Agency
- Newmarket Community Partnership
- Newmarket Racecourses Trust
- Planning authority
- Racing Welfare
- Responsibility in Gambling Trust
- Royal British Legion
- Society for the Study of Gambling
- Suffolk Constabulary

- Suffolk County Council
- Suffolk Local Safeguarding Children's Board
- Tesco PLC
- The Racecourse Association Ltd
- Town and parish councils within the district
- West Suffolk Crossroads
- West Suffolk Council heads of service

Schedule B

Section 353 of the Gambling Act 2005 gives some general interpretation and reference for some of the main terminology used within the act and contained within this statement of principles document. Except where the context otherwise requires:

- **'adult gaming centre'** has the meaning given by section 237
- **'alcohol licence'** has the meaning given by section 277
- **'authorised local authority officer'** has the meaning given by section 304
- **'authorised person'** has the meaning given by that section
- **'betting'** has the meaning given by sections 9 to 11, 37 and 150
- **'betting intermediary'** has the meaning given by section 13
- **'bingo'** means any version of that game, irrespective of by what name it is described
- **'casino'** has the meaning given by section 7
- **'casino game'** has the meaning given by that section
- **'Category A gaming machine'** (or B, C or D) means a gaming machine falling within category A (or B, C or D) as prescribed under section 236
- **'chief constables of police forces'** has the same meaning in relation to England and Wales as in the Police Act 1996 (c. 16)
- **'child'** has the meaning given by section 45
- **'club gaming permit'** has the meaning given by section 271
- **'club machine permit'** has the meaning given by section 273
- **'commercial club'** has the meaning given by section 267
- **'the Commission'** means the Gambling Commission
- **'director'**:
 - a. has the meaning given by section 741 of the Companies Act 1985 (c. 6), and
 - b. includes a shadow director within the meaning of that section.
- **'dog track'** means premises which are designed, used or adapted for use for dog racing
- **'draw'**, in relation to a lottery, has the meaning given by section 255
- **'EEA State'** means a State which is a contracting party to the Agreement on the European Economic Area signed at Oporto on 2nd May 1992 (as it has effect from time to time),
- **'Enactment'** includes an enactment comprised in, or in an instrument made under, an Act of the Scottish Parliament
- **'Enforcement officer'** means a person designated or appointed as an enforcement officer under section 303
- **'equal chance gaming'** has the meaning given by section 8
- **'exempt lottery'** has the meaning given by section 258
- **'external lottery manager'** has the meaning given by section 257
- **'fair'** has the meaning given by section 286
- **'family entertainment centre'** has the meaning given by section 238
- **'family entertainment centre gaming machine permit'** has the meaning given by section 247
- **'football pools'** means an arrangement whereby:
 - a. people compete for prizes by forecasting the results of association football games, and
 - b. each entry to the competition must forecast the results of at least four games.

- **'gambling'** has the meaning given by section 3
- **'gambling software'** has the meaning given by section 41
- **'game of chance'** has the meaning given by section 6
- **'gaming'** has the meaning given by that section
- **'gaming machine'** has the meaning given by section 235
- **'horse-race course'** means premises which are designed, used or adapted for use for horse-racing
- **'horse-race pool betting'** has the meaning given by section 12
- **'large casino'** has the meaning given by regulations under section 7(5)
- **'licensed family entertainment centre'** has the meaning given by section 238
- **'licensed premises gaming machine permit'** has the meaning given by section 283
- **'the licensing objectives'** has the meaning given by section 1
- **'licensing authority'** has the meaning given by section 2
- **'lottery'** has the meaning given by section 14 (and section 256)
- **'lottery manager's operating licence'** has the meaning given by section 98
- **'lottery ticket'** has the meaning given by section 253
- **'machine'** has the meaning given by section 235(3)(a)
- **'members' club'** has the meaning given by section 266
- **'miners' welfare institute'** has the meaning given by section 268
- **'the National Lottery'** has the meaning given by section 1 of the National Lottery etc. Act 1993 (c. 39)
- **'non-commercial betting'** has the meaning given by section 302
- **'non-commercial gaming'** has the meaning given by section 297
- **'non-commercial society'** has the meaning given by section 19
- **'occasional use notice'** means a notice given under section 39
- **'operating licence'** means a licence issued under Part 5
- **'on-premises alcohol licence'** has the meaning given by section 277
- **'participant'**, in relation to a game of chance, includes a person who discharges an administrative or other function in relation to the game
- **'participation fee'** has the meaning given by section 344
- **'passenger vessel'** means a vessel which is carrying or expected to carry at least one passenger
- **'personal licence'** means a licence issued under Part 6
- **'pool betting'** has the meaning given by section 12
- **'premises'** includes any place and, in particular:
 - a. a vessel, and
 - b. a vehicle
- **'premises licence'** means a licence issued under Part 8
- **'private betting'** has the meaning given by section 295 and Part 2 of Schedule 15
- **'private gaming'** has the meaning given by section 295 and Part 1 of Schedule 15
- **'private gain'** is to be construed in accordance with section 19(3)
- **'prize'** in relation to gaming (except in the context of a gaming machine) has the meaning given by section 6
- **'prize'** in relation to a gaming machine has the meaning given by section 239
- **'prize'** in relation to a lottery has the meaning given by section 14
- **'prize gaming'** has the meaning given by section 288
- **'prize gaming permit'** has the meaning given by section 289
- **'proceeds'**, in relation to a lottery, has the meaning given by section 254
- **'profits'**, in relation to a lottery, has the meaning given by that section

- **'profits'**, in relation to non-commercial prize gaming, has the meaning given by section 299
- **'racecourse'** means premises on any part of which a race takes place or is intended to take place
- **'real'**, in relation to a game, event or process means non-virtual
- **'relevant offence'** has the meaning given by section 126 and Schedule 7
- **'remote communication'** has the meaning given by section 4
- **'remote gambling'** has the meaning given by that section
- **'remote gambling equipment'** has the meaning given by section 36
- **'remote operating licence'** has the meaning given by section 67
- **'rollover'**, in relation to a lottery, has the meaning given by section 256
- **'small casino'** has the meaning given by regulations under section 7(5)
- **'society'** includes a branch or section of a society
- **'stake'** means an amount paid or risked in connection with gambling and which either:
 - a. is used in calculating the amount of the winnings or the value of the prize that the person making the stake receives if successful, or
 - b. is used in calculating the total amount of winnings or value of prizes in respect of the gambling in which the person making the stake participates.
- **'supply'** includes:
 - a. sale
 - b. lease, and
 - c. placing on premises with permission or in accordance with a contract or other arrangement.
- **'temporary use notice'** has the meaning given by section 215
- **'track'** means a horse-race course, dog track or other premises on any part of which a race or other sporting event takes place or is intended to take place
- **'travelling fair'** has the meaning given by section 286
- **'vehicle'** includes:
 - a. a train
 - b. an aircraft
 - c. a seaplane, and
 - d. an amphibious vehicle (other than a hovercraft within the meaning of the Hovercraft Act 1968 (c. 59))
- **'vessel'** includes:
 - a. anything, other than a seaplane or an amphibious vehicle, designed or adapted for navigation or other use in, on or over water
 - b. a hovercraft (within the meaning of the Hovercraft Act 1968), and
 - c. anything, or any part of any place, situated in or on water
- **'virtual'** has the meaning given by subsection (3) below
- **'winnings'**, in relation to a bet, means anything won, whether in money or in money's worth, and **'young person'** has the meaning given by section 45.

Schedule C

Summary of machine provisions by premises

Summary of gaming machine categories and entitlements

Summary of gaming entitlements for clubs and alcohol licensed premises

Summary of offences under the Gambling Act 2005

Summary of Statutory application forms and notices

For all of the above please follow the link to: [Gambling Commission](#) website.

Schedule D

Authorised gambling activities

Children and young persons – A child is any person who is less than 16.

- Category D machines
- Equal chance gaming at a licensed family entertainment centre
- Equal chance gaming under prize gaming permit
- Football pool

Young persons – A young person is an individual of 16 or 17

- Category D machines
- Equal chance gaming at a licensed family entertainment centre
- Equal chance gaming under prize gaming permit
- Prize gaming at a travelling fair
- Prize gaming at a non-licensed family entertainment centre
- Private, non-commercial gaming or betting
- Lottery

Appendix B

Gambling Act 2005

Draft Local Area Profile 2025

Contents

1.	Introduction	3
2.	Local area profile	3
3.	West Suffolk's approach to the local area profile	4
4.	Gambling as a public health issue	4
	Definition of 'problem gambling'	5
	The Impact of 'problem gambling'	5
	Young people and problem gambling	Error! Bookmark not defined.
	Gambling and debt.....	Error! Bookmark not defined.
	Online gambling.....	6
5.	West Suffolk gambling premises	6
	West Suffolk premises	6
6.	Compilation of the local profile.....	7
7.	Location and vulnerability data	7
	Location data	7
	Vulnerability criteria	8
	Additional sources.....	8
	Appendix A.....	9
	Participation in gambling activities	9
	Profile of participants in gambling activity	9
	Gambling frequency	Error! Bookmark not defined.
	Appendix B.....	10
	High level local profile	10

1. Introduction

Nationally, gambling policy and the regulatory environment overall has an increasing focus on risk. While not compulsory, it is now recommended that a licensing authority creates a 'local area profile' to inform its understanding of risk and to allow appropriate decisions to be made and steps taken to mitigate these risks.

From April 2016, gambling establishment operators must undertake 'local area risk assessments' for all their premises and will be expected to give due consideration to the information available in the council's 'local area profile'.

Although not a compulsory requirement, we have included a local area profile in the proposed Gambling Act Statement of Policy to increase awareness of local risks and improve information sharing with gambling operators. This will facilitate constructive engagement with licensees and a more coordinated response to local risks.

The local area profile will help to inform the local risk assessment process. For example, if a gambling outlet is to be located within close proximity to a school, we would expect licensees to have sufficient controls in place to mitigate associated risks, for example implementing a robust Challenge 25 policy and ensuring that the premises is so designed that children cannot see gambling taking place. The Council believe that contribution to premises risk assessments and being knowledgeable and informed on the 'local area' and risks is necessary in order to provide sufficient detail within the assessment. This means that any assessments undertaken do need to have an involvement of and an understanding of the local area in which they operate and are licensed.

It is wholly anticipated that the council's Local Area Profile will develop over time and will be influenced by information and intelligence from researchers, key partners and other stakeholders.

2. Local area profile

The purpose of this document is to, in accordance with the [Gambling Commission's Gambling Guidance for Local Authorities](#), to highlight areas in the district inhabited or frequented by groups that might be more at risk of the negative impacts of gambling.

The Gambling Commission emphasise through their Licence Conditions and Codes of Practice (LCCP) that risk assessments (or Local Area Profiles) are of benefit to the licensing authority and the operators. As listed in the Guidance for Local Authorities, the benefits are:

- it enables licensing authorities to better serve their local community, by better reflecting the community and the risks within it
- greater clarity for operators as to the relevant factors in licensing authority decision making, will lead to improved premises licence applications, with the operator already incorporating controls and measures to mitigate risk in their application
- it enables licensing authorities to make robust but fair decisions, based on a clear, published set of factors and risks, which are therefore less susceptible to challenge
- it encourages a proactive approach to risk that is likely to result in reduced non-compliance and enforcement action.

3. West Suffolk's approach to the local area profile

The Gambling Act 2005 sets out three licensing objectives:

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

The studies carried out by the Geofutures Gambling and Place Research Hub established the following criteria for groups that could potentially be more vulnerable to gambling:

- Living in more deprived areas
- Financial difficulties or debt
- Substance abuse or addiction issues
- Poor mental health
- Unemployed
- Homelessness
- Ethnic minority groups.

West Suffolk Council has also expressed in its Statement of Gambling Licensing Policy that consideration be given to the proximity of gambling premises to:

- local schools, youth clubs, play areas and other premises directed at, or primarily used by children and young people
- places where vulnerable people are housed or treated
- areas where there are a high concentration of children and young people or vulnerable people.

The West Suffolk Local Area Profile seeks to capture all these criteria both in terms of location specific data and data associated with vulnerable or protected groups (such as deprivation indices).

4. Gambling as a public health issue

The last decade has seen many changes in the British gambling landscape. The most notable changes during this period include growth in the availability of remote gambling (particularly via the internet), the introduction of fixed odds betting terminals into most bookmakers, an increase in the number of casinos, an increase in the prominence of poker (both online and offline), and the introduction of online betting exchanges.

All major current research has been undertaken at national level.

A [Gambling Commission survey on gambling participation](#) carried out in March 2023 found that overall participation in any gambling activity was 44 per cent. The survey also found that 0.3 per cent of people experience issues relating to gambling and that the rate of those gambling at a moderate level of risk is 1.2 per cent and low level of risk is 1.8 per cent.

Likewise, according to a [study](#) in 2022, 0.9 per cent of young people experience issues and 2.4 per cent experience gambling at elevated levels of risk.

However, it is likely these estimates are conservative, and may not capture some vulnerable population groups.

A [YouGov \(2020\) survey found](#) that approximately 3.6 million (7 per cent) adults and children in Great Britain are negatively affected by someone else's gambling.

Definition of 'harmful gambling'

The [LGA](#) and the National Institute for Health and Care Excellence (NICE) define 'harmful gambling' as an umbrella term to describe any frequency of gambling that results in people experiencing harm. It includes those gambling at elevated risk of harm (low risk and moderate risk in the screening tools) as well as those experiencing 'problem' gambling. Gambling related harm is a broad concept that impacts a wide range of people, including families, colleagues, employers, and those within the wider community who may not have been involved in gambling themselves. Harms may include financial hardship, relationship breakdown, domestic abuse, mental health problems and suicidal thoughts.

It is important to note that anyone can be negatively affected by gambling. Gambling behaviours occur along a continuum, with possible harms dependent on the level of exposure. .

The circumstances that increase risk

The harms caused by gambling for the individual include anxiety, stress, depression, and alcohol and substance misuse. These factors are likely to have a wider impact on family and friends, including family breakdown, as well as neglect and violence. There are higher rates of separation and divorce among problem gamblers compared to the general population.

Further impacts of gambling include the inability to function at work, and financial problems that can lead to homelessness. The harms from gambling to wider society include fraud, theft, loss of productivity in the workforce, and the cost of treating this addiction.

Harmful gambling is also considered a comorbidity - the term used to describe the existence of concurrent disorders in an individual. It also refers to the ways in which these disorders interact or interfere with each other.

As with all addictive behaviours, people who struggle with gambling disorders tend to have other psychological problems:

- unipolar or major depression
- bipolar disorder
- suicidal thinking, and
- substance misuse

Consequently, the LGA advises that councils should seek to prevent exposure at a population level to harmful gambling products and practices.

The key at risks groups or behaviours are:

- Young people
- unemployed and constrained economic circumstance
- area deprivation
- homeless
- mental ill health
- substance abuse or misuse
- personality traits or cognitive distortions
- people experiencing gambling harms who are seeking treatment.

Online gambling

Online gambling does not sit within the local authorities remit, nor is it in the scope of this document. However, it is worth mentioning some information about online gambling as it is an increasingly prevalent form of gambling, now accounting for over 38.2 per cent of the total market (as of 2023).

In a Statista survey ending in March 2023, around a quarter (25.9 per cent) of respondents in Great Britain answered that they had taken part in a form of online gambling in the past four weeks prior to being surveyed. This would estimate to around 46,607 people in West Suffolk.

The age group with the largest share of online gamblers was 45- to 54-year-olds, with 35.6 per cent of respondents in this demographic having gambled online in the stated period. Meanwhile, the age group that participated the least in online gambling in this period was 16- to 24-year-olds at 14 per cent, a decrease from a high of 17.7 per cent in 2022.

5. West Suffolk gambling premises

Across West Suffolk there is currently the following licensed premises:

- 2 or less gaming machines 143
- Club gaming permit 2
- Club machine permit 16
- Gambling premises licence 25
- Gaming machine authorisation 3
- Gaming mc permit 4
- Society Lottery Registration 83

These premises pose potential risks to those who reside, work, and visit West Suffolk in terms of associated crime and health impacts.

West Suffolk premises

Breakdown of gambling premises is detailed below:

Town	Breakdown
Brandon	<ul style="list-style-type: none"> • 2 betting shops (High Street and Market Hill) • 1 licensed premises gaming machine permits
Bury St Edmunds	<ul style="list-style-type: none"> • 6 betting shops (St Andrews Street South, St Olaves Precinct, Hardwick Shopping Centre, Risbygate Street, Cornhill) • 1 Family Entertainment Centre Gaming Permit (Western Way) • 9 licensed premises gaming machine permits • 2 Club machine permits
Haverhill	<ul style="list-style-type: none"> • 2 betting shops (High Street and Queen Street) • 2 premises licence gaming machine permits
Mildenhall	<ul style="list-style-type: none"> • 2 betting shops (Mildenhall Market Place) • 1 licensed premises gaming machine permit
Newmarket	<ul style="list-style-type: none"> • 1 adult gaming centre (Wellington Street) • 1 horse racing betting track (Rowley Mile) • 12 betting shops (All Saints Road, The Rookery, High Street, Valley Way, Wellington Street, the Guineas) • 2 premises licence gaming machine permits

West Suffolk Council has a number of licensed premises (2003 act) that have two gambling machines (automatic entitlement) and are required to be registered with the appropriate fee paid. While these are not separately licensed, they will be inspected accordingly, and the council will review their activities within the guidance. It is expected that these premises will consider an appropriate risk assessment based on this the Local Area Profile.

6. Compilation of the local profile

In line with updated guidance, the council will use the Local Area Profile to support those using the Gambling Statement of Principles Policy. The profile will be maintained separately from the Statement to enable it to be updated accordingly.

Applicants are further encouraged to conduct research of the local area to identify issues or locations with a high prevalence of vulnerable persons.

7. Location and vulnerability data

The following tables give links to available data on West Suffolk and its communities in order to inform licensing applications and decisions.

Location data

Location criteria	Identified datasets and data sources
<ul style="list-style-type: none"> • Over concentration of betting premises • Local schools and educational centres • Play areas • Places of worship 	Geographical information that can be searched by postcode to find key features and facilities in the vicinity: using the West Suffolk Council Find my nearest tool.

<ul style="list-style-type: none"> • Community facilities or public buildings • ATMs 	
Crime or criminal activity	Current local crime patterns and hotspots by location (see Police.uk)
Youth clubs	Suffolk Infolink - Community directory

Vulnerability criteria

Vulnerable persons criteria	Identified datasets and data sources
<ul style="list-style-type: none"> • Children and young people • Economically inactive residents • Minority ethnic groups 	Key population and health data broken down by local authority ward: West Suffolk Council - Ward reports
Most deprived areas	Suffolk-wide statistics that can also be broken down by ward, district or shared authority and focus on the following themes: Suffolk Observatory Statistics on relative deprivation in small areas in England: GOV.UK - English indices of deprivation 2019
Financial difficulties or debt	Food banks – Suffolk County Council - Food Banks
Substance abuse or addiction	Suffolk Infolink - Health and care - search results
Poor mental health	Public Health England - National General Practice Profiles
Unemployed	Job centres can be found by using the West Suffolk Council Find my nearest tool.
Homeless	Information confidentially held by West Suffolk Council

Additional sources

- [GambleAware GB Maps | BeGambleAware](#)
- [Gambling Commission – Levels of Problem Gambling in England](#)
- [Gambling Commission – Taking a more in-depth look at Online Gambling](#)
- [Gambling Commission – Industry Statistics, February 2024](#)
- [Gambling Commission – What do we know? National Strategic Assessment, 2020](#)
- [The Lancet Report – Tackling Gambling related harms as a Public Health issue](#)
- [Gamcare – Gambling related financial harm](#)

- [Tackling gambling related harm: A whole council approach | Local Government Association](#)

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Appendix A

The following statistics have been sourced from the Gambling Commission [report](#) participation in gambling and rates of problem gambling across England in 2021, the Statistics on gambling participation – Year 1 (2023) [report](#), and the Health Survey for England, 2021 [report](#):

Participation in gambling activities

- Overall, 48 per cent of the adult population (aged 16 and over) spent money on some form of gambling over the course of a year. This equates to around 20.3 million adults in the UK. Applied to the estimated adult population of West Suffolk (149,000, Census, 2021) this would amount to around 71,904 people in the authority.
- The most popular gambling activity is the National Lottery. In 2023, 31 per cent of adults who gambled had bought tickets for the National Lottery Draw.
- After the national lottery, the next most popular gambling activities are other charity lottery draws (16 per cent), scratch cards (13 per cent), horserace betting (12 per cent), casino games (3 per cent) and sports betting (3 per cent).

Profile of participants in gambling activity

- Men are more likely than women to gamble overall (53 per cent for men and 43 per cent for women).
- Gambling participation is associated with age – participation was lowest among the youngest groups.
- According to the 2021 report, gambling prevalence is highest among those who are:
 - either married or had been married (75 per cent)
 - white or white British (76 per cent)
 - those whose highest qualification was GCSE's or equivalent (76 per cent)
 - those in lower supervisory/technical households (79 per cent)
 - those in paid work (78 per cent)
 - those with the highest personal income.

Other key facts

As of 2021:

- 10 per cent of adults had participated in any online gambling (excluding National Lottery and other lotteries) in the last 12 months.
- According to their Problem Gambling Severity Index (PGSI) scores, 2.8 per cent of adults were identified as engaging in at-risk or problem gambling and 0.3 per cent as engaging in problem gambling.
- Men were more likely to be identified as engaging in at-risk or problem gambling than women (4.4 per cent of men and 1.1 per cent of women).

- People who had gambled and spent money on four or more different gambling activities in the last 12 months were more likely to engage in at-risk or problem gambling (27.8 per cent) than those who gambled on two or three different activities (4.6 per cent) or only one activity (1.6 per cent).
- Among adults who had gambled in the last 12 months, their PGSI scores identified 5.8 per cent as engaging in at-risk or problem gambling compared with 18.2 per cent of those who had gambled online.

Appendix B

High level local profile

Population

- The population of West Suffolk is currently 178,881 (Office for National Statistics 2017) located within five main centres of population (Brandon, Bury St Edmunds, Haverhill, Mildenhall, Newmarket) and a number of smaller rural communities.
- Between 2017 and 2030, the population of West Suffolk is expected to grow by 8 per cent, compared to 9 per cent in England as whole.
- West Suffolk has an ageing population. 20.9 per cent of the population is aged 65 and over, compared to the England average of 18.2 per cent.
- The West Suffolk population is less ethnically diverse than the England average – 86.3 per cent of the population are white compared to 79.8 per cent across England.
- 47.6 per cent of the population in West Suffolk consider themselves to be in very good health, roughly in line with the England average of 47.2 per cent.

Economy and skills

- West Suffolk saw a large increase in the number of people in employment between 2015 to 2016, with a rise of 3.98 per cent compared to 3.12 per cent across the United Kingdom (Business Register and Employment Survey).
- 82.9 per cent of West Suffolk's 16 to 64-year-olds are economically active. This is slightly higher than the 78.7 per cent England average.
- As of April 2017, 4 per cent of the 16 to 18-year-old population in West Suffolk were not in education, employment or training (NEET), compared to 8.4 per cent in England (Labour Force Survey).
- 15.4 per cent of West Suffolk employees work in business and admin support services, 11.8 per cent worked in manufacturing, 11.8 per cent in health, 9.6 per cent in retail and 7.9 per cent in accommodation and food services.
- In 2016, the percentage of residents aged between 16 and 64 with NVQ4+ level qualifications or more was 33 per cent, which is higher than the Suffolk average of 31.1 per cent but lower than the national average of 37.1 per cent (ONS Annual Population Survey).
- In 2018, the proportion of young people achieving 9-4 pass in English and Maths GCSE was 62.1 per cent, which is below the national average of 64.2 per cent (Department for Education).

Housing

- The average household size in West Suffolk is 2.4 people, in line with the England average.
- Between 2006 and 2016, the number of households in West Suffolk increased at a faster rate than the national average – 9.6 per cent compared to 8.6 per cent.
- By 2039, the number of households in West Suffolk is expected to increase by 20 per cent compared to 2014 figures (Ministry for Housing, Communities and Local Government).
- In 2016, the lower quartile house prices to ratio of lower quartile gross annual earnings was 9.48 in Forest Heath and 9.55 in St Edmundsbury. The East region average ratio was 9.29 and the average ratio for England was 7.26 (Office for National Statistics House price to residence-based earnings ratio).
- In 2018, the average monthly cost of renting a home in Forest Heath was £1,000 and £932 in St Edmundsbury. The average for England was £881 per month.
- In 2016-17 the number of people accepted as homeless increased significantly from 209 in 2015-16 to 242 in 2016-17 (Ministry for Housing, Communities and Local Government).
- The rate of homelessness in West Suffolk stood at 3.21 households per 1,000 between 2017-18. This is higher than the England average of 2.41 households per 1,000 (West Suffolk Council figures).

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