

Published 2 December 2014

Agenda for meeting of the Cabinet to be held at 6.00 pm on Wednesday, 10 December 2014 in the Town Hall, Eastbourne

Members of the public are welcome to attend and listen to the discussion of items in the "open" part of the meeting. Please see notes at end of agenda concerning public rights to speak and ask questions.



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Members of the Cabinet:

Councillor David Tutt (Leader and Chairman of Cabinet): Responsibilities aligned with Chief Executive and including the Community Strategy, Local Strategic Partnership, the Corporate Plan and economic development.

Councillor Gill Mattock (Deputy Leader and Deputy Chairman of Cabinet): Financial services including accountancy, audit, purchasing and payments.

Councillor Margaret Bannister: Direct assistance services including revenues and benefits, housing and community development, bereavement services and the Crime Reduction Partnership.

Councillor Carolyn Heaps: Tourism and leisure services.

Councillor Troy Tester: Core support and strategic services.

Councillor Steve Wallis: Place services including cleansing and recycling, parks and downland, engineering, building and development control, planning policy and strategy, environmental health and licensing.

[KD] against an item indicates that the matter involves a Key Decision and that the item has been listed in the Council's Forward Plan for at least 28 clear days.

[BPF] against an item indicates that the matter is part of the Council's Budget and Policy Framework and as such will require the approval of the Full Council.

Publication of this agenda also constitutes notice (or confirmation that such notice has previously been given) to the Chairman of the Scrutiny Committee and members of the public as appropriate:

(1) Under regulation 10(3) of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 in respect of any key decision not included in the Council's Forward Plan of Key Decisions within 28 days of this meeting. Such items (if any) are marked **[KDGE]** and the reasons why compliance with regulation 9 (publicity in connection with key decisions) was impracticable are given.

(2) Under regulation 5(4) of the above mentioned regulations that certain matters listed on this agenda (if any) may need to be considered in private. (This notice is given further to the earlier notice given under regulation 5(2). The reasons for private consideration are given at the relevant item, together with details of representations received (if any) about why the meeting should be open to the public.

1 Minutes of the meeting held on held on 22 October 2014

Previously circulated.

2 Apologies for absence.

3 Declarations of interests by members

Declarations of disclosable pecuniary interests (DPIs) by members as required under Section 31 of the Localism Act and of other interests as required by the Code of Conduct and regulation 12(2)(d) of the 2012 Access to Information Regulations. (Please see note at end of agenda).

4 Questions by members of the public.

On matters not already included on the agenda and for which prior notice has been given (total time allowed 15 minutes).

5 Urgent items of business.

The Chairman to notify the Cabinet of any items of urgent business to be added to the agenda.

6 Right to address the meeting/order of business.

The Chairman to report any requests received to address the Cabinet from a member of the public or from a Councillor in respect of an item listed below and to invite the Cabinet to consider taking such items at the commencement of the meeting.

7 Corporate performance - Quarter 2 2014/15 (KD) (Pages 1 - 46)

Report of Chief Finance Officer and Head of Corporate Development.
Cabinet lead members: Councillors Gill Mattock and Troy Tester.

8 Council Budget 2015/16 - Draft budget proposals (KD) (Pages 47 - 58)

Report of Chief Finance Officer.
Cabinet lead member: Councillor Gill Mattock.

9 Council Tax Base and Business Rate Income 2015/16 (KD) (Pages 59 - 68)

Report of Chief Finance Officer.
Cabinet lead member: Councillor Gill Mattock.

10 Sustainable Service Delivery Strategy (SSDS) - Update (KD) (Pages 69 - 84)

Report of Senior Head of Infrastructure.
Cabinet lead member: Councillor Troy Tester.

11 Internal Drainage Boards (KD) (Pages 85 - 140)

Report of Senior Head of Infrastructure
Cabinet lead member: Councillor Steve Wallis.

12 Employment Land Local Plan (KD) (Pages 141 - 200)

Report of Senior Head of Development.
Cabinet lead member: Councillor Steve Wallis.

13 Council Tax Discretionary Reduction Policy (KD) (Pages 201 - 212)

Report of Senior Head of Community.
Cabinet lead member: Councillor Margaret Bannister.

14 Redundancy and redeployment policy (BPR) (Pages 213 - 234)

Report of Head of Corporate Development.
Cabinet lead member: Councillor Troy Tester.

Inspection of background papers – Please see contact details listed in each report.

Public right of address – Requests by members of the public to speak on a matter which is listed in this agenda must be **received** in writing by no later than 12 Noon, 2 working days before the meeting (e.g. if the meeting is on a Wednesday, received by 12 Noon on the Monday before). The request should be made to Local Democracy at the address listed below. The request may be made by, letter, fax, or electronic mail. For further details on the rules about speaking at meetings or for asking a question on a matter not listed on the agenda please contact Local Democracy.

Public questions – Members of the public may ask a question on a matter which is not on the agenda. Questions should be made in writing and by the same deadline as for the right of address above. There are rules on the matters on which questions can be asked. Please ask Local Democracy for further information

Councillor right of address - Councillors wishing to address the meeting who are not members of the Cabinet must notify the Chairman in advance (and no later than the immediately prior to the start of the meeting).

Disclosure of interests - Members should declare their interest in a matter at the beginning of the meeting, and again, at the point at which that agenda item is introduced.

Members must declare the existence and nature of any interest.

In the case of a disclosable pecuniary interest (DPI), if the interest is not registered (nor the subject of a pending notification) details of the nature of the interest must be reported to the meeting by the member and subsequently notified in writing to the Monitoring Officer within 28 days.

If a member has a DPI or other prejudicial interest he/she must leave the room when the matter is being considered (unless he/she has obtained a dispensation).

Implementation of decisions - Implementation of any key decision will take place after 5 working days from the date notice is given of the Cabinet's decision (normally on the day following the meeting) unless subject to "call-in". Exceptions to this requirement are allowed when the decision is urgent.

Further information – The Forward Plan of Key Decisions, Councillor contact details, committee membership lists and other related information are available from Local Democracy. To receive regular e-mails alerting you to the publication of Cabinet agendas (or other meeting agendas) please send an e-mail to:

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You can view the Forward Plan of Key Decisions at

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Agenda Item 7

- BODY:** CABINET
- DATE:** 10th December 2014
- SUBJECT:** Corporate Performance - Quarter 2 2014/15
- REPORT OF:** Chief Finance Officer and Head of Corporate Development
- Ward(s):** All
- Purpose:** To update Members on the Council's performance against Corporate Plan priority actions, performance indicators and targets for Quarter 2 2014/15.
- To inform Cabinet of the Council's provision financial outturn for Quarter 2 2014/15.
- Contact:** William Tompsett, Strategic Performance Manager
Tel 01323 415418 or internally on ext 5418
- Pauline Adams, Financial Services Manager
Tel 01323 415979 or internally on ext 5979.
- Recommendations:** Members are asked to:
- i) Agree the performance against national and local Performance Indicators and Actions from the 2010/15 Corporate Plan (2014 refresh).
 - ii) Agree the General Fund, HRA and Collection Fund financial performance for the quarter ended September 2014, as set out in sections 3, 4 & 6.
 - iii) Agree that any nationally agreed pay award be applied across all staff in the organisation as set out in paragraph 3.4.
 - iv) Approve the virements and transfer to and from reserves as set out in Appendix 3
 - v) Approve the amended capital programme as set out in Appendix 4.
 - vi) Agree the Treasury Management performance as set out in section 7.

1.0 Introduction

- 1.1 The 2010/15 Corporate Plan was refreshed for 2014 and sets out a number of key actions and indicators to deliver and measure progress against key priorities. Throughout the year, performance against these key indicators and milestones is reported to Cabinet and Scrutiny committees on a quarterly basis and to Scrutiny monthly.

- 1.2 The information in these performance reports is collected and managed using the Covalent performance management system. Further detail behind the report and evidence providing a full and robust audit trail for the performance information presented is available to view within the online system. Members are invited to contact the Strategic Performance Team at any time to arrange individual training support on using the system if required.
- 1.3 In the absence of a National Performance Framework it is important that the authority continues to strengthen its own performance management procedures particularly in relation to the use of robust local indicators and meaningful reporting against actions and activities. The actions, milestones and performance indicators in the Corporate Plan refresh 2014 have been chosen to reflect this year's priority activities and objectives with a view to realising the longer term vision set out in the Corporate Plan.
- 1.4 Due to operational improvements made to our activity reporting procedures, we have made a change to one of the reported performance indicators. CS_012 "Calls Handled at First Point of Contact" has now been replaced with CS_012a "Telephone Calls handled at first point of contact." This new version of the indicator focuses solely on phone scripts.

2.0 Performance Overview

- 2.1 **Appendix 1** is a detailed report on the 2014/15 activities and outturns of the performance indicators listed within the Corporate Plan. This report shows the latest available outturns for the local performance indicators featured in the 2010/15 Corporate Plan broken down into themed areas.
- 2.2 Each project has been allocated a number of in-year actions and milestones to be completed in order to progress the project efficiently. Some projects may be fully completed within the year whereas larger scale priorities will be delivered over a longer period. **The first section of Appendix 1 lists all the Corporate Plan priority actions whose in-year milestones have already been fully completed this year.** Full details of the specific milestones and commentary for these actions is available on request or directly via the Covalent Performance Management System.
- 2.3 The second section of Appendix 1 lists the ongoing actions showing all milestones that were scheduled for completion within the first half of the 2014/5 year along with commentary to explain the context behind them.
- 2.4 Chapter summary text has been supplied by the relevant Heads of Service to provide added context for the performance reported in each section. This commentary highlights important achievements and challenges for the reporting period and can be found at the start of each chapter.
- 2.5 The PI tables show which indicators related to the priority projects are performing on target (green tick icon), failing to reach target (red octagonal icon) or are near misses (amber triangle icon). Relative performance is based on quarterly targets as set by the managers of each area using past

performance, available benchmarking and planned service developments.

- 2.6 The current outturn for each PI is shown on the performance gauges in column 4 – Year to date. The gauges show visually how the level of performance compares to targets (green zones) and near miss levels (amber zones). Amber zones have been reviewed to reflect appropriate levels of performance expectation and any national targets which are lower than our own local aspirations.
- 2.7 The bar charts in column 6 show comparative performance against previous quarters/years as appropriate. This enables an at a glance indication of whether performance is improving or not and will help identify potential trends and seasonality of performance.
- 2.8 Commentary has been included in the action and indicator outturn tables where supplied. This provides some contextual background to the performance and this function and is backed up by the online evidence collation facility of the Covalent system.
- 2.9 Of the 29 Key Performance Indicators reported in the Corporate Plan this quarter, 7 are currently showing as Red, 14 are showing as Green, 2 are showing as Amber and 6 are data only or contextual PIs. The off target PIs are...
- DE_011 - Number of reported fly-tipping incidents
 - CD_008 - Decent Homes programme
 - CD_055 – Number of completed adaptations (Disabled Facilities Grants)
 - CD_156- Number of households living in temporary accommodation
 - ECSP_002 - Shoplifting rate compared to 2013/14
 - ECSP_004 - Violent crime in a public place rate compared to 2013/14
 - ECSP_016 – Serious Acquisitive Crime (robbery, car crime and burglary dwelling) rate compared to 2013/14
- 2.10 We have the capability within Covalent to analyse performance data via dashboard reporting. This allows us to look beyond green – amber – red performance reporting and drill down more into the data and what it is telling us. The following PIs are showing as the relatively best performing according to the latest confirmed data available:

Best Performing (PIs)	Value	Target	Gauge
TL_005 Marketing campaign value for money	£0.60	£0.88	
CS_011 Telephone call abandonment rate	3.15%	6%	
CD_181 Time taken to process Housing Benefit/Coun...	4.4 days	10.0 da...	
CD_051 Number of difficult problem properties reme...	26	15	
TL_017a Redoubt visitors - paying visitors	11,961	7,200	
TL_008 Conference delegates	14,800	13,000	
CD_050 Empty privately owned homes returned to oc...	87	60	
CS_003 Sickness absence - average days lost per emp...	2.44 da...	2.9 days	
DE_192 Percentage of household waste sent for reus...	37.79%	35.00%	
CD_056 Median average number of days for assistan...	89 days	100 days	
DE_194 Missed collections	2,401	2,650	
DE_007 EBC Carbon Footprint - Vehicles	28 ton...	30 ton...	

*The data in this table is based on the latest reported out-turns including annually reported indicators so may include PIs where data is from the 2013/14 out-turn.

3.0 Financial Performance – General Fund

3.1 General Fund performance for the year to September is shown in the table below:

Department	Full Year Budget £'000	Profiled Budget £'000	Actual to 30 Sept 14 £'000	Variance to date £'000	Initial Projected Outturn £'000
SUMMARY					
Corporate Services	11,967	6,302	6,310	8	(5)
Community Services	278	23,884	23,930	46	47
Tourism & Leisure Services	2,857	1,768	1,827	59	80
Total Service Expenditure	15,102	31,954	32,067	113	122
Contingencies etc	161	80	44	(36)	(73)
Capital Financing and Interest	1,699	726	726	-	-
Contributions to/(from) Reserves	291	(247)	(247)	-	-
Net Expenditure	17,253	32,513	32,590	77	49

Service Details are shown at **Appendix 2**

3.2 The position to the end of September shows a variance of £77,000 on net expenditure which is a movement of £60,000 compared to the position reported at the end of the first quarter in June. Service expenditure has a variance of £113,000 mainly as a result of:

- One-off Backdated rental income (£35k)
- Development Control Legal and Consultants Fees £40k
- Downs Water Supply new Contract £33k
- Dotto Train £65k

An element of this service overspend is off set by the saving on the contingency fund.

- 3.3 It was reported at the quarter one monitoring report that there were a number of risks around the Revenues and Benefits area due to the implementation of a new system. Whilst the project was delivered broadly on time and on budget, the nature of the benefits regime requires post implementation checking to be put in place to reduce errors. This checking is still ongoing and will continue to year end. Not until the year end is run on the new system and the audit complete will this risk be quantifiable.
- 3.4 A new two year pay award has been agreed by the National Joint Council for Local Government Services (NJC) and employee organisations based on a 2.2% increase from 1 January 2015 plus one off lump sum payments. There are a number of employees outside the NJC pay scales, as a result of being TUPE'd into the organisation or are above SCP 49, it is therefore proposed that any agreed pay award be applied to all staff across the workforce employed under NJC terms and conditions.
- The total value of this pay award is within existing budgets.
- 3.5 The contingency allowance currently stands at £161,050 and has been used to offset service expenditure. Therefore there is no further funding available for any future unforeseen one off areas of expenditure during the year.
- 3.6 The projected outturn shows a variance of £49,000. This is within 0.28% of the net budget and is within an acceptable tolerance level. However management continues to manage this position to ensure that this final outturn position is maintained or improved.
- 3.7 Member's approval is also sought for the transfer from reserves as set out in Appendix 3. These transfers are in line with the approved financial strategy.
- 3.8 Financial procedure rules require all virement requests over £10,000 for revenue expenditure to be approved by Cabinet. These are set out in Appendix 3.

4.0 Financial Performance – HRA

- 4.1 HRA performance for the quarter is as follows:

	Current Budget	Profiled Budget	Actual to 30 Sept 14	Variance to date	Projected Outturn
	£'000	£'000	£'000	£'000	£'000
HRA					
Income	(15,356)	(7,776)	(7,750)	26	89
Expenditure	12,202	3,883	3,794	(89)	(154)
Capital Financing & Interest	2,346	-	-	-	-
Contribution to Reserves	500	-	-	-	-
Total HRA	(308)	(3,893)	(3,956)	(63)	(65)

- 4.2 HRA performance is currently above target due to a number of factors

including underspending on council tax for void properties, new insurance contract and reduction in provision for bad debts required.

Rental income is down as a result of a reduced number of properties from Right to Buys and a delay in opening Winchester Court, which went live on the rents system on 27 October.

5.0 Financial Performance – Capital Programme

5.1 The detailed capital programme is shown at Appendix 4. Actual expenditure is low compared to the budget, due to delays in the start dates of housing major projects, sheltered accommodation remodelling projects and several general fund projects. Expenditure is expected to increase as schemes progress however the spending patterns will be reviewed at quarter three and re-profiled into the 2015/16 year where appropriate.

5.2 The capital programme has been amended from that approved by Cabinet in September to reflect new approved schemes.

6.0 Financial Performance – Collection Fund

The Collection Fund records all the income from Council Tax and National Non-Domestic Rates and its distribution to the major precepting authorities. With the introduction of the new system for the local retention of business rates, the performance of the Collection Fund is now be included as part of the performance monitoring and the results shared with the major preceptors.

6.1 The projected Collection fund for the year is as follows:

	Council Tax £'000	Business Rates £'000
Balance B/fwd 1.4.14	79	3,048
Deficit recovery	(100)	(2,065)
Debit due for year	(53,497)	(33,052)
Payments to preceptors	52,355	33,155
Transitional Relief	-	18
Allowance for cost of collection	-	127
Allowance for appeals	-	(331)
Write offs and provision for bad debts	991	414
Estimated balance 31.3.15	(172)	1,314
Allocated to:		
CLG	-	657
East Sussex County Council	(125)	118
Eastbourne Borough Council	(24)	526
Sussex Police	(15)	-
East Sussex Fire & Rescue	(9)	13
	(172)	1,314

6.2 The allocations to preceptors reflect the operation of the Collection Fund for Council Tax and retained Business Rates which are distributed on different

bases under regulation. The distribution of the estimated balance at quarter 3 will be made in 2015/16. Any changes after that date will be made in 2016/17.

6.3 Council Tax is currently showing a £172,950 surplus, due to higher than budgeted number of chargeable properties and a reduction in the number of Single Person Discounts awarded.

6.4 The Business Rates deficit of £1,314,414 is as a result of a bigger than anticipated provision made in 2013/14 for outstanding appeals, giving rise to a higher than budgeted for balance carried forward as at 1.4.2014. Currently there are 93 properties with appeals outstanding with a total rateable value £12m, a reduction of 13 properties with a rateable value of £6m since 1 April 2014. The valuation office is expecting to settle all these claims within the next 12 months however the uncertainty of the potential value of successful appeals remains a major risk to the Collection Fund at this time. The deficit represents 3.98% of the total debit for the year.

6.5 Collection performance is as follows:

Cash Collection Rates	Council Tax	Business Rates
Q2 Actual	56.32%	54.33%
Q2 Target	55.78%	54.85%

7.0 Treasury Management

7.1 The detailed mid-year Review Report has been submitted to the Audit and Governance Committee on 3 December in compliance with the CIPFA's Code of Practice for Treasury Management. Below is a summary of the main points from the current economic background, interest rate forecasts, investment and borrowing performance.

7.2 Economic Background

After strong UK GDP quarterly growth over the last few quarters it appears very likely that strong growth will continue through 2014 and into 2015 as forward surveys for the services and construction sectors, are very encouraging and business investment is also strongly recovering. Overall strong growth has resulted in unemployment falling much faster through the initial threshold of 7%, set by the Monetary Policy Committee (MPC) last August, before it said it would consider any increases in Bank Rate. The MPC has, therefore, subsequently broadened its forward guidance by adopting five qualitative principles and looking at a much wider range of about eighteen indicators in order to form a view on how much slack there is in the economy and how quickly slack is being used up. Most economic forecasters are expecting growth to peak in 2014 and then to ease off a little, though still remaining strong, in 2015 and 2016.

UK employment and wage data for the three months to September showed a positive outlook for the economy. For the first time since 2009, wage growth outperformed consumer –level inflation and looks likely to continue. There has

been the sharp fall in inflation (CPI), reaching 1.2% in September, the lowest rate since 2009. Forward indications are that inflation is likely to fall further in 2014 to possibly 1%.

Unemployment is expected to keep on its downward trend and this is likely to eventually feed through into a return to significant increases in pay rates at some point during the next three years

7.3 **Interest Rate Forecast**

Overall, markets are expecting that the MPC will be cautious in raising Bank Rate as it will want to protect heavily indebted consumers from too early an increase in Bank Rate at a time when inflationary pressures are also weak. A first increase in Bank Rate is therefore expected in Q2 2015 and then it is expected that increases after that to be at a slow pace to lower levels than prevailed before 2008

7.4 **Annual Investment Strategy**

The Treasury Management Strategy Statement (TMSS) for 2014/15, which includes the Annual Investment strategy, was approved by the Council on 15 February 2014. It sets out the Council's investment priorities as being:

- Security of Capital;
- Liquidity;
- Yield.

A full list of investments held as at 30 Sept 2014 is shown in the table below.

Counterparty	Amount	Interest Rate	Maturity
Santander	£2,700,000	0.74%	Call
RBS	£100,000	0.35%	90 days notice
TOTAL	£2,800,000	0.73%	

In addition a sum of £1m is invested with Lloyds Bank at a rate of 3.03% maturing on 23.1.19. This investment is held as part of the LAMS scheme and all interest earned will be transferred into a reserve set up to mitigate any financial risks arising from that scheme.

No approved limits within the Annual Investment Strategy were breached during the quarter end 30 September 2014.

Investment rates available in the market have continued at historically low levels. Funds are available on temporary basis for investment and arise mainly from the timing of the precept payments, receipts of grants and progress on the capital programme.

7.5 **Investment performance**

Investment performance for the quarter ending 30 September 2014 is as follows:

Benchmark	Benchmark Return	Council Performance	Interest Earning
7 day	0.35%	0.64%	£16,000

As Illustrated, the authority outperformed the benchmark by 0.29%. The Council's budgeted investment return for 2014/15 is £50,000, current performance is below this target due to the continuous use of internal balances during the first 6 months thus keeping interest paid lower whilst borrowing rates are higher than investments.

7.6 **Borrowing**

A long term loan of £2m was taken from the Public Works Loan Board on 5 September 2014 for 45.5 years at 3.85%.

Cash flow predictions indicated that further borrowing will be required later in the year. The exact timing and nature of this borrowing will be considered at that time, however to maintain a sustainable maturity profile it is anticipated that new borrowing will be at maturity dates between 8 and 10 years.

7.7 **Compliance with Treasury and Prudential Limits**

It is a statutory duty for the Council to determine and keep under review the affordable borrowing limits. The Council's approved Treasury and Prudential Indicators (affordability limits) are included in the approved TMSS.

During the quarter to 30 September 2014 the Council, has operated within all Treasury Limits and Prudential Indicators set out in the Council's Treasury Management Strategy Statement and in compliance with the Council's Treasury Management Practices.

7.8 **Bank Contract**

Following the withdrawal of the Co-op bank from local authority business, a procurement exercise was carried out in partnership with the East Sussex Procurement Hub. The contract was awarded to Lloyds Bank with an aim of a go live date of 1 December 2014 for this Council. Work is currently in progress and is on track to meet this deadline.

8.0 **Consultation**

8.1 Not applicable

9.0 **Implications**

9.1 There are no significant implications of this report.

10.0 **Conclusions**

10.1 This report provides an overview of performance against the authority's priority actions and indicators as at Quarter 2 2014/15. Progress against the

key projects and indicators is updated on the online Covalent system on a regular basis and provides a "live" view of the Council's performance accessible at any time.

- 10.2 Both the General Fund and HRA budgets are on target, capital expenditure is low but this is to be expected as some of the major schemes are yet to commence.
- 10.3 The Collection Fund forecast for Council Tax is indicating a surplus of £172,950 and a deficit for Business Rates of £1,314,414. This will be allocated to or collected from preceptors during 2015/16.
- 10.4 Treasury Management performance is on target and all activities were within the approved Treasury and Prudential Limits

William Tompsett
Strategic Performance Manager

Pauline Adams
Financial Services Manager

Background Papers:

The Background Papers used in compiling this report were as follows:

Corporate Plan 2010/15 (2014 refresh)
Covalent performance management system reports
Budget monitoring working papers as at 30.9.14
Capita Treasury Solutions Monthly Investment Analysis Review September 2014

To inspect or obtain copies of background papers please refer to the contact officer listed above.

Completed CP Actions - 2014 Q2



Priority Theme	Project	Status
Priority Theme 2 Quality Environment	CP14_2_01 Managing Waste Responsibly	
Priority Theme 3 Thriving Communities	CP14_3_05(a) Enable the transfer of Towner to independent governance	

Corporate Plan Milestones Quarter 2 2014/15



Parent Action	Action	Description	Due Date	Note	Completed
CP14_1_01 Tourism Marketing and Brand Development	CP14_1_01a New Tourism and Economic Development strategy	Complete draft strategy for CMT discussion	31-May-2014	The Tourism part of the strategy has been completed; The economic development section is currently being drafted and once this has been completed will be taken to CMT for approval.	Yes
CP14_1_01 Tourism Marketing and Brand Development	CP14_1_01b New brand development and marketing campaign	Present a brief to CMT/Cabinet to secure funding to identify companies that can present branding options	31-May-2014	The brand development brief will be discussed at Cabinet on July 17th. Once the funding has been secured the brief will be sent out to the agreed agencies.	Yes
		Advertise and appoint a brand consultancy agency	31-Jul-2014	We have written a brief and have advertised and interviewed a number of agencies who submitted interest in the brand development project.	Yes
		Work with the agency to create a brand theme for consultation	30-Sep-2014	We have agreed an approach to how the consultation will be themed. However we have taken a short paper to CMT which has suggested a delay in the start time of the consultation and the project. this will now commence after Christmas	Yes
CP14_1_02 Employment - Town Centre	CP14_1_02e Review existing ring road	Work in partnership with ESCC to finalise scope of project	30-Sep-2014	Project Initiation Document prepared and presented to the Project Board on 5 June.	Yes
CP14_1_03 Business Support Scheme	CP14_1_03b Maximise Business Rate Relief giving £800k back to small businesses	Draft local Rate Relief Policy	14-May-2014	Draft local Rate Relief policy has been formulated.	Yes
		Complete consultation with stakeholders	30-Jun-2014	Consultation held.	Yes
		Report to Cabinet to adopt local policy.	31-Jul-2014	Local policy agreed by Cabinet on 16 July 2014.	Yes
CP14_1_04 Employment - Sovereign Harbour	CP14_1_04b Progress the provision of the Community Centre	Secure agreement for the site from the land owner.	30-Apr-2014	Site was acquired on 15th April.	Yes
		Procure development partner to deliver the community centre	31-Jul-2014	Commissioned Sea Change Sussex to deliver the community centre.	Yes
CP14_2_02 Improving the Cleanliness of the Street and Public Areas	CP14_2_02a Prevention campaigns to reduce environmental crime	Complete litter campaigns all zones	30-Sep-2014	Design of litter campaign in progress, with a competition for children to design an anti-litter poster. The poster will not be ready until 31st Jan 2015	No
CP14_2_02 Improving the Cleanliness of the Street and Public Areas	CP14_2_02b Renovation of public conveniences	Specify internal fixture and fittings and decorations	31-Jul-2014	Specification in development. Three site visits undertaken to view modular systems in other WC. Project group formed including Friends of Hampden Park.	Yes

Parent Action	Action	Description	Due Date	Note	Completed
		Specify schedule of works	31-Jul-2014	Specification in development. Three site visits undertaken to view modular systems in other WC. Project group formed including Friends of Hampden Park.	Yes
		Put works out to tender and receive returns	31-Aug-2014	Works have been tendered and contract awarded.	Yes
CP14_2_03 Allotment Provision	CP14_2_03a Continue to build extra allotment spaces in phases throughout the year	Churchdale Road planning permission	30-Apr-2014	Planning Committee considered application on 15 April . Permission granted with conditions.	Yes
CP14_2_ENV Priority Theme 2 Quality Environment	CP14_2_03 Allotment Provision	Specify and secure quotations to create allotments	30-Sep-2014	Quotations received.	Yes
CP14_2_04 Towards a Low Carbon Town	CP14_2_04b Implement actions to reduce the carbon use of the Council's own buildings (b)	Complete feasibility study for alternative heating and lighting solutions for the Eastbourne Sports Park	30-Sep-2014	Awaiting potential solutions from Carillion	No
CP14_2_05 Transport - Cycling Provision	CP14_2_05a Implement Cycle Strategy	Publish feedback on consultation on priority cycle routes	30-Apr-2014	Feedback published as part of the report to Cabinet on 19th March.	Yes
CP14_2_06 Eastbourne Park	CP14_2_06a Form a land owners group and stakeholders group to implement action plan for the Park	Agree branding and publicity material to increase awareness and use of the Park	30-Sep-2014	Branding produced and awaiting comments from land owners group.	No
		Appoint Consultants	30-Apr-2014	First site meeting on 26 March 2014.	Yes
CP14_2_07 Pride in Our Parks	CP14_2_07b Biodiversity Report on Hampden Park Lake	Interim appraisal of report	31-Aug-2014	The report will be developed throughout the year, but progress is being monitored regularly. There are 4 reports being created throughout the full year and those completed to date have been appraised.	Yes
CP14_2_07 Pride in Our Parks	CP14_2_07c Hampden Park Management Plan	Tender project	31-May-2014	This project is a little behind schedule. A consultants' brief has been prepared and a request to return quotations has been sent out for return by the 31-July-14.	Yes
		Appoint consultants	07-Jun-2014	Consultants have now been appointed to work on the management plan.	Yes
CP14_2_07 Pride in Our Parks	CP14_2_07d Old Town Recreation Ground Management Plan	Tender project	31-May-2014	This project is a little behind schedule. A consultants' brief has been prepared and a request to return quotations has been sent out for return by the 31-July-14.	Yes
		Appoint consultants	07-Jun-2014	Consultants have now been appointed to work on the	Yes

Parent Action	Action	Description	Due Date	Note	Completed
				management plan.	
CP14_2_07 Pride in Our Parks	CP14_2_07e Deliver key elements of the Princes Park Development Plan	Prioritise and commence process to procure consultancy works to deliver the plan	31-May-2014	The key elements of the Princes Park Development Plan have been included within the Coastal Communities Grant and we have been successfully in passing Stage One of the funding application for more than £800,000. More detailed work is now required to work up the scheme to planning application stage. The bid is to deliver improvements to the cafe and also creating a new entrance from the seafront into Princes Park. Other parts of the development plan are ongoing and improvements to the infrastructure have been made (main path from Wartling Road to mini roundabout) and the modernisation of planted displays.	Yes
		Planning Permission/ Building Control required for proposed improvements – Princes Park cafe; and public realm improvements i.e. access from the promenade through car park	30-Sep-2014	Planning permission obtained. We now await the result of the second round CCF bid.	Yes
CP14_2_07 Pride in Our Parks	CP14_2_07f Five Acres Railings	Specify and procure works	30-Jun-2014	Five Acres Railings specified and submitted for quotations by 15-Jul- 14.	Yes
CP14_3_01 Develop Youth Services and Activities	CP14_3_01a Deliver new Youth Strategy to be implemented in 2015	Agree scope of Strategy with Youth Partnership	30-Sep-2014	Initial outline discussed with Youth Partnership and Youth Forum. Data is being collected and surveys of young people, parents and agencies have been carried out and analysed to confirm priorities.	Yes
CP14_3_01 Develop Youth Services and Activities	CP14_3_01b Deliver Youth Fair 2014 for young people to showcase their skills and achievements	Agree overall plan and arrangements	31-Jul-2014	Plans agreed and in hand. Funding and in-kind resources secured from Amicus Horizon, Places for People, EBC, Sussex Police and ESCC Youth Service to cover costs. We are focusing on achieving wider publicity amongst young people this year.	Yes
		Publicise Youth Fair and invite bookings and performances	30-Sep-2014	The Youth Fair has been widely publicised through websites and social media, leaflets, posters and Adshels as well as through schools and partner organisations. This will continue until the Youth Fair itself on 28 October. A press release is being prepared by Cobb. Bookings and a programme of performances are being finalised.	Yes
CP14_3_01 Develop Youth Services and Activities	CP14_3_01d Implement current Youth Strategy	Monitor implementation of Strategy	31-Jul-2014	Action Plan was reviewed and updated in May and July. The latest update is available to download.	Yes
CP14_3_02 Improving	CP14_3_02c Deliver grants to	Revise policy and procedures to increase	31-Jul-2014	Revisions to the policy and procedures were presented	Yes

Parent Action	Action	Description	Due Date	Note	Completed
Neighbourhood Delivery	Community and Voluntary organisations	transparency and fairness		to Cabinet on 16 July 2014 and approved. These will be publicised during August and expressions of interest invited for Community Grant funding in 2015/16.	
		Launch programme for 2015/16 grants	31-Aug-2014	The programme was launched through the Herald, local VCS newsletters and a meeting in August. Organisations were invited to submit initial Expressions of Interest. Those organisations eligible to apply for grants have now been invited to apply in full and to attend training sessions on 20th and 30th October.	Yes
		Monitor 2013/14 small grants	30-Sep-2014	Monitoring returns have been received from 15 the 16 groups which were awarded grants in 2013 to 14. An email has been sent to the remaining organisation reminding them of the need to return these.	Yes
CP14_3_02 Improving Neighbourhood Delivery	CP14_3_02d Monitoring and Analysis of Ward Walks	First Ward Walk event held	30-Sep-2014	Two ward walks locations have now been agreed for Langney and Upperton. Planning is underway for delivery by 30 December 2014.	No
		Second Ward Walk event held	30-Sep-2014	Two ward walks locations have now been agreed for Langney and Upperton. Planning is underway for delivery by 30 December 2014.	No
CP14_3_02 Improving Neighbourhood Delivery	CP14_3_02e ECSP Programme Delivery Plan	Quarter 1 Update	30-Jun-2014	The ECSP has been refreshed and updated for 2014/2017 with additional focus on domestic violence, road safety, street community and child exploitation. Of the 41 actions contained in the plan 32 are currently on track, green, with none showing red. It is contended that effective implementation of the plan over the next three years will assist partners continue to drive community safety improvements, as documented in previous years.	Yes
		Quarter 2 Update	30-Sep-2014	The ECSP has been refreshed and updated for 2014/2017 with additional focus on domestic violence, road safety, street community and child exploitation. Of the 41 actions contained in the plan 32 are currently on track, green, with none showing red. It is contended that effective implementation of the plan over the next three years will assist partners continue to drive community safety improvements, as documented in previous years.	Yes

Parent Action	Action	Description	Due Date	Note	Completed
CP14_3_03 Best Use of Housing Resources	CP14_3_03a Housing Futures - Agree new approach to housing management of municipal housing stock	Recommended approach reported to Cabinet	31-Jul-2014	Cabinet Reported has been presented and was approved for 'EHL in Partnership'.	Yes
CP14_3_03 Best Use of Housing Resources	CP14_3_03b Housing Repairs and Maintenance	Strategic review completed	31-Jul-2014	Strategic review field work, stakeholder workshops and options appraisals were concluded on 14th of July. Initial report and findings were presented to EHL Board by procurement consultants PML on 29th of July. Final report and recommendations for preferred delivery model will go before EHL Board for decision on 25th of September.	Yes
		Report on preferred delivery model for new contract circulated	29-Aug-2014	Initial report and findings were presented to EHL Board by procurement consultants PML on 29th of July. Final report and recommendations for preferred delivery model will go before EHL Board for decision on 25th of September.	Yes
		Approval of preferred delivery model by EHL and EBC	30-Sep-2014	On 25th September 2014 EHL Board considered the options presented for re-procuring repair services and approved the recommended option (bundled contracts by work stream) as the preferred delivery model.	Yes
CP14_3_03 Best Use of Housing Resources	CP14_3_03c Housing and Economic Development	Support submission of funding bid for improvements to be made to the market rented sector (in partnership with the Coastal Communities Group of the LEP)	30-Jul-2014	The funding submission bid, as part of the proposal Coastal Communities Group housing initiative, has been submitted, for a programme of a total circa £21,000,000. It should be noted that funding for the programme as a whole has not yet been confirmed by the SELEP.	Yes
CP14_3_03 Best Use of Housing Resources	CP14_3_03e Upperton Gardens	Quarter 1 update	30-Jun-2014	Following a review of how to realise the most positive financial contribution from this property, the original proposal to refurbish and sell as four flats is no longer being taken forward. The property is to be sold as is, with planning consent to secure a profitable sale.	Yes
		Quarter 2 update	30-Sep-2014	Works to communal areas due to start on 29th September 2014. The property is now being actively marketed for sale as three units with new 125 year leases. Council to retain the tenanted flat and freehold.	Yes
CP14_3_03 Best Use of Housing Resources	CP14_3_03f Supporting Housing and Economic Progress (SHEP)	All properties for conversions purchased	30-Jun-2014	The Empty Homes Programme is on track in terms of all of the required properties having now been purchased and a programme for specification and tenders being followed through.	Yes

Parent Action	Action	Description	Due Date	Note	Completed
CP14_3_04 Support to Vulnerable Households	CP14_3_04a Deliver Welfare Reform Action Plan	Review Discretionary Housing Payment policy	31-May-2014	Policy reviewed.	Yes
		In conjunction with County, review demand in quarter 1	30-Jun-2014	County have collected quarter 1 data. Report not yet published.	Yes
		Rent in advance scheme is live	30-Jun-2014	Scheme is live and running. EHL and EBC will continue to work with partners to mitigate the effects of the Welfare Reforms through a local Action Plan and with reference to the East Sussex Welfare Reform Project to mitigate the impact on both EHL income and tenancy sustainment.	Yes
		In conjunction with County, review demand in quarter 2	30-Sep-2014	Data sent to County.	Yes
CP14_3_04 Support to Vulnerable Households	CP14_3_04c Tackle rough sleeping	Consolidated Rough Sleeper Outreach Service (St Mungo's Broadway) established in Eastbourne	30-Sep-2014	There have been two review meetings recently with St Mungo's Broadway and the service has integrated well with all Sussex authorities and their voluntary sector partners. There have been regular outreach teams working through all 13 authorities in Sussex and long term rough sleepers have been positively identified and services identified to assist in preventing entrenched rough sleeping.	Yes
		Evaluate outcomes of the Complex and Multiple Needs Panels (homeless clients)	30-Sep-2014	In September 2014 a Survey Monkey was undertaken with all partners to evaluate the success of the Panel and a positive return of 63% with regard to its usefulness and effectiveness was reported. There will be a Panel meeting in October 2014 to look at sustainability of Panels and how this will be organised.	Yes
		Introduction of personalised budgets for entrenched rough sleepers (PB45 project)	30-Sep-2014	A cohort of 26 long term rough sleepers have been identified across Sussex and put forward to access PB45 services via St Mungo's Broadway outreach service. Services have been put in place to enhance outlook of the long term rough sleepers. Services will be identified through the personalised budgets to ensure rough sleepers who are put forward will receive the bespoke services they need to get them off the streets.	Yes
CP14_3_COM Priority Theme 3 Thriving Communities	CP14_3_05(b) Progress work with English Heritage to secure funding for the development of the Redoubt as an accessible, living	Draft a five year Heritage plan for discussion with CMT	31-May-2014	A draft five year plan is almost complete, and will be finished by the end of July. The work was paused whilst we waited to meet with the HLF as we wanted a steer from them to ensure the plan included the criteria for funding applications.	Yes

Parent Action	Action	Description	Due Date	Note	Completed
	museum	Agree and finalise the Heritage Plan and start to compile key evidence to support the funding bid	31-Jul-2014	The Heritage Plan has been finalised and has been sent to CMT and will be presented for discussion at the end of October.	Yes
		Re-write the funding bid for the HLF	31-Aug-2014	The draft HLF application has been written and we are now in the process of checking, correcting and agreeing the final details before presenting to the HLF Committee.	Yes
		Consultation and finalise bidding document	30-Sep-2014	We have a final draft of the HLF plan and this will be circulated before sending to the HLF in November.	Yes
CP14_3_06 Tennis Development	CP14_3_06a Refurbish Courts at Hampden Park and Old Town Rec with new membership scheme launched	Prepare a 'Tennis Development Plan'	30-May-2014	Parks Tennis Development Strategy completed and submitted with relevant bids.	Yes
		Prepare and submit funding bid to Sport England	06-Jun-2014	Funding bid for £50,000 submitted.	Yes
		Prepare and submit funding bid to Lawn Tennis Association	31-Jul-2014	Funding bid for £80,000 submitted.	Yes
CP14_3_07 Active Eastbourne	CP14_3_07a Complete and implement the first priorities of the Active Eastbourne strategy	Develop a Sport and Physical Activity Forum	30-Jun-2014	Although we have identified potential members of a sport and physical activity forum we have not yet managed to set a date to meet. A revised timescale for an initial meeting is by 31/08/14 where the group will start to develop an action plan along with setting short term priorities. The forum is now in existence, albeit only as a virtual group at present. Further work is being carried out on the strategy document prior to getting the group together to develop an action plan and set our priorities.	Yes
		Forum to develop and action Plan and prioritise	31-Aug-2014	Following discussions with internal stakeholders and the CEO of Active Sussex it has been agreed that the Sport & Physical Activity Strategy needs to be refreshed prior to the development of an action plan and setting of priorities. The draft strategy was written back in 2012 and presented to CMT at that time. A refreshed document will be finalised by 31st Dec 2014 and an action plan in place for April 2015.	No
		Commence work on action plan	30-Sep-2014		No
CP14_3_08 Devonshire Park	CP14_3_08c Complete new façade to Congress Theatre	Commence works to facade	31-Aug-2014	Works commenced.	Yes
CP14_4_02 Sustainable Service Delivery Strategy (SSDS)	CP14_4_02a Implementation of Future Model Phase 2	Programme plan reviewed and re-published	30-Jun-2014	The new programme plan has been agreed and reported to DRIVE Board, staff and Cabinet. Covalent milestones have been updated accordingly.	Yes
CP14_4_02 Sustainable	CP14_4_02b Exploring a	Commission iESE review of shared	30-Apr-2014	Review commissioned and initial findings have been	Yes

Parent Action	Action	Description	Due Date	Note	Completed
Service Delivery Strategy (SSDS)	range of partnerships to achieve further efficiencies	Corporate Services with Lewes District Council/other organisations		reported to both Lewes and Eastbourne Cabinets. IESE are now looking to work up the detailed business case and implementation plan.	
		Consult on outcome/recommendations of IESE review	31-Jul-2014	All corporate services teams have been consulted about the changes.	Yes
		Report to Cabinet with recommendations on the sharing of corporate services with Lewes District Council/other organisations	10-Sep-2014	Report to Cabinet on 22 October 2014.	Yes

Overarching commentary : Prosperous Economy – Q2



This second quarter sees the main long term projects for economic regeneration move another step closer to reality. Work continues with the land assembly and L&G continue to purchase property by private treaty. Since the last quarter the draft Compulsory Purchase Order has been completed and been subject to a health check by DCLG, who has confirmed that, subject to some minor revisions, the Order is sound. The next stage is to make the Order and this is expected in November.


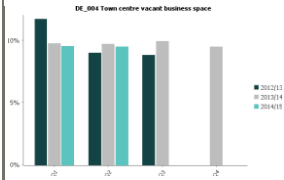

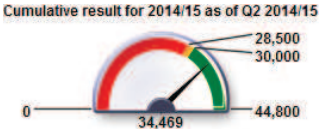
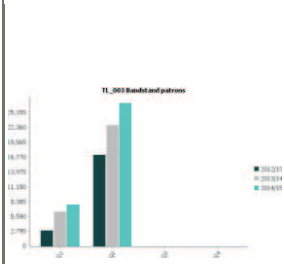
The plans for the improvement to Terminus Road are in the final design phase and meetings are taking place with key stakeholders to inform them of how the design is evolving. The programme for the improvement works is to coincide with the Phase 1 opening of the new Arndale extension. Alongside this work, ESCC has begun work on the review of the ring road. Resources have been set aside by ESCC to get to a preferred option stage and this is expected to be known in the summer of 2016.

The construction of the Innovation Mall at Sovereign Harbour has begun. The Mall provides 3,000 square metres and will provide up to 300 jobs. Completion is expected in the middle of 2015.

Prosperous Economy PIs 2014/15

Rows are sorted by Code

Traffic Light	
Green	1
Data Only	5

Traffic Light Icon	Code & Short Name	Year to date	Q2 2014/15	Comparison with previous year's quarter / previous year's value if annual PI.	Latest Note	Portfolio Owner
			Value			
	DE_004 Town centre vacant business space	Latest result for 2014/15 as of September 2014 9.46%	9.46%		The town centre vacancy rate of 9.46% as at September 2014 continues to remain below the national average of 10.6%.	Jeff Collard
	TL_003 Bandstand patrons	Cumulative result for 2014/15 as of Q2 2014/15 	26,748		The Bandstand season for 2014 has shown an increase in patrons of over 5,000 people. This has been felt across the whole concert programme. We have seen a 28% increase on bar spend and the gross income is up by 23%. The attached report shows exactly how the income and patrons are distributed. It's worth noting that a big contributor to the success of the bandstand has been the great weather we experienced through July and September	Rob Cottrill

Traffic Light Icon	Code & Short Name	Year to date	Q2 2014/15	Comparison with previous year's quarter / previous year's value if annual PI.	Latest Note	Portfolio Owner
			Value			
	TL_041 Number of visitors (day visitors and staying trips)	2014/15 result 4,795,000	Not measured for Quarters		The income received from staying visitors has shown a 6% increase on 2012, however the actual staying numbers has dropped on 2012, this is showing that visitors are paying more for their accommodation and Eastbourne is attracting a higher yield visitor.	Rob Cottrill
	TL_042 Total tourist spend	2014/15 result £272,119,000	Not measured for Quarters		A number of tourism related businesses expressed that 2013 had been a good year for their business, particularly the summer holidays. We will be comparing Eastbourne data with other Sussex destinations to see if the trend of the past few years is continuing.	Rob Cottrill
	TL_043 Total day visitor spend	2014/15 result £111,230,000	Not measured for Quarters		The spend per visitors has shown a modest increase on the previous year, which concurs with actual numbers visiting. The first half of the year up until end of June the weather was very mixed with high winds and rain, however a glorious July and August really boosted the visitor numbers	Rob Cottrill
	TL_044 Total accommodation spend	2014/15 result £160,889,000	Not measured for Quarters		The data collected for 2013, using the Cambridge Model data source gives us a benchmark to compare year on year. The actual occupancy numbers has shown a slight drop on 2012 yet actual income from occupancy has shown a 6% increase, we believe this is due to a higher yield achieved.	Rob Cottrill

Overarching commentary : Quality Environment – Q2



The planning application for the remaining major development sites at Sovereign Harbour has been given outline planning consent subject to completion of a legal agreement. Discussion and negotiation is now completed and agreement has been reached on the section 106. The work for the delivery of the community centre is now the priority. A project manager has been appointed and work is currently taking place to understand the ground conditions of the community centre site which will inform the design.

Five of the priority routes in the Eastbourne Cycling Strategy are in the detailed designed phase for implementation during 2014/15. Discussions with DCLG continue about creating more flexibility in the existing byelaw so that a seafront route can be designed in detail.

The skate park at Hampden Park has now been completed with just the work to reinstate the temporary access outstanding. Skaters can use the new facility while this takes place. Hampden Park and Old Town Recreation Ground continue to work towards Green Flag status for the first time and Princes Park has retained its designation for the fourth year. Work to meet the target for increased allotment plots continues and although the long summer has delayed the start of the next phase, it is anticipated the work will be delivered on time.



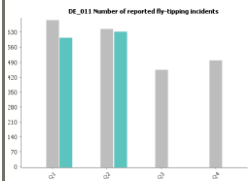

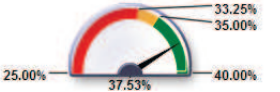
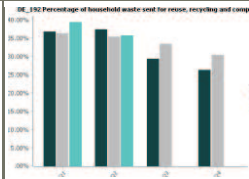
Recycling performance continues to improve and is on target, although this remains a key area of focus to ensure the upward trajectory continues. Ongoing work includes bidding for funding to promote recycling, Neighbourhood First recycling popups around the town and we are developing stickers to inform customers if they have used the wrong bin. Missed bin figures continue to remain a focus and are falling ahead of target. Public reports of fly tipping have reduced by 20% and are expected to meet the target reduction by the end of the year. Excellent proactive work is being carried out to work with specific parts of the community to anticipate and reduce fly tipping during peak times.



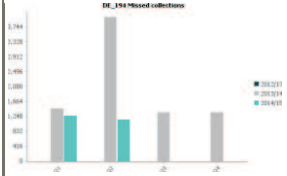
Quality Environment PIs 2014/15

Rows are sorted by Code

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Green	2

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Traffic Light Icon	Code & Short Name	Year to date	Q2 2014/15	Comparison with previous year's quarter / previous year's value if annual PI.	Latest Note	Portfolio Owner
			Value			
	DE_011 Number of reported fly-tipping incidents	<p>Cumulative result for 2014/15 as of September 2014</p> 	631		As with the previous quarter we now have a reduction of 20% of public calls over quarter 1 and quarter 2, with an increase in advisor reports. The first two quarters of the year are historically when we receive more reports. We have formed a partnership with the Student Union (Brighton University) and Furniture Now to address issues around student accommodation, arranging for the correct disposal of items when the term is completed. A fly tip reduction strategy forms part of S&FP 2015/16 based on the complete data set we now have.	Henry Branson
	DE_192 Percentage of household waste sent for reuse, recycling and composting	<p>Cumulative result for 2014/15 as of September 2014</p> 	35.63%		This recycling rate is good and above our annual target - however the Joint Waste Partnership are currently looking at ways to further reduce residual waste and improve recycling rates.	Henry Branson

Traffic Light Icon	Code & Short Name	Year to date	Q2 2014/15	Comparison with previous year's quarter / previous year's value if annual PI.	Latest Note	Portfolio Owner
			Value			
	DE_194 Missed collections	<p>Cumulative result for 2014/15 as of September 2014</p> 	1,141		Eastbourne Borough Council continue to work with Kier to reduce missed collections. The numbers of missed collections have reduced, enabling us to focus on resolving any ongoing collection issues.	Henry Branson



Overarching commentary : Thriving Communities – Q2

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The Devonshire Park Project has moved significantly forward with two key appointments – Levitt Bernstein are the lead consultants on the overall project and Triton Building Renovation are the contractor undertaking the works to the Congress Facade. Tenders are currently being sought for a range of specialists to support the Lead Consultant. Both projects are on track as programmed and within budget.

Work to bring back empty properties remains strong and above target with 87 homes returned to use at the end of this quarter. Five longer term empty properties have been returned to occupation through intensive work by the Empty Property Officer. These homes often made the biggest negative impact on neighbourhoods (due to disrepair) and can be the most challenging to bring back to use. There are many reasons why properties remain empty, including where there are ownership issues, where people inherit and lack the knowledge to move repairs forward or where investment landlords have purchased solely for longer term development prospects.

The Difficult Property Group has successfully dealt with 26 properties this quarter and made a real difference to a row of 5 terraced properties in Cavendish Place which have all been fully refurbished. The eyesore flats above the Halifax Building in the town centre have been renovated and now let and after many years the ugly lorry at Seabeech Lane has been removed. The work of the DPG has real momentum and is refocusing its work over the next few months to concentrate on Elms Avenue in the heart of the town centre and to work in tandem with the Housing and Economic Development Project.

During the last quarter, the Revenues and Benefits team have installed a new financial case management system during the last quarter and work to fully implement and train staff is still ongoing. This is a major exercise and at the time of writing, migration to the new system is progressing to plan and every effort is being made to minimise any disruption.

Time taken to complete disabled adaptation works has significantly reduced this quarter to 89 days and this represents the best ever performance recorded by the team. This indicator is viewed as priority as fast delivery adaptations not only help residents struggling to cope in their own homes but also stop hospital 'bed blocking' and premature admission to care.

Eastbourne has the third lowest levels of overall crime when compared to our most similar group of towns. From September 2014 Eastbourne is compared with a lower-crime set of towns. Whilst some areas of crime recording are up on last quarter partners believe performance will smooth out over the rest of the year.

Building has been completed on 37 new affordable family homes with all let to households in housing need. Despite these additional homes, the housing team are continuing to see high demand from people requiring housing advice and help to finding accommodation.


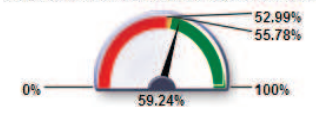
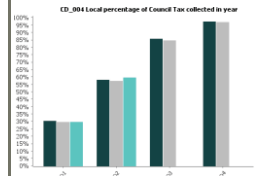
Eastbourne Homes is working with Age Concern whereby they remove furniture and other abandoned items from empty properties, for resale in their retail units or for recycling. The scheme started in September.



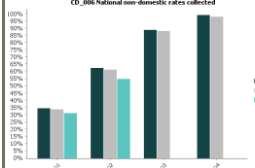


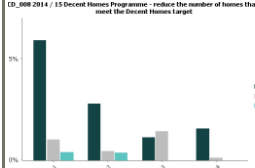



The Steps team at Eastbourne Homes recently achieved an excellent 'A' rating for their floating support service to people over 65. They have also been asked by ESCC to deliver the information and advice part of the 'winter warmth' programme over the next 6 months. Staff have been trained in fuel poverty and health awareness so that they can provide vulnerable people who live in a cold home with information about how to keep warm and access services.

Thriving Communities PIs 2014/15



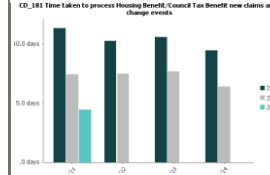


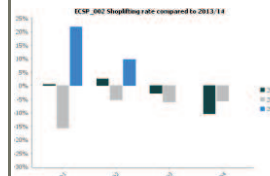



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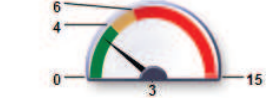
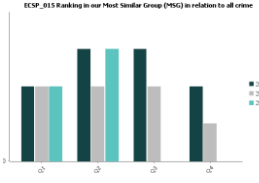

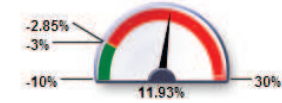


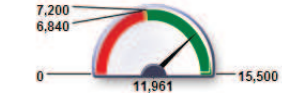
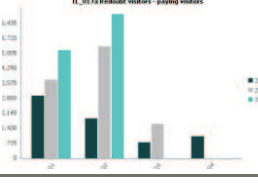
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Amber	1
Green	9


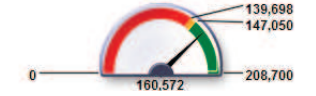
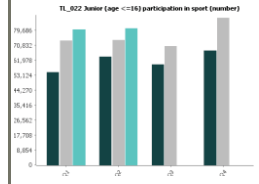


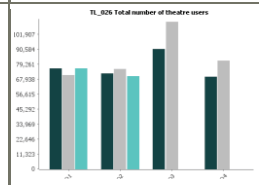
Traffic Light Icon	Code & Short Name	Year to date	Q2 2014/15	Comparison with previous year's quarter / previous year's value if annual PI.	Latest Note	Portfolio Owner
			Value			
	CD_004 Local percentage of Council Tax collected in year	<p>Latest result for 2014/15 as of September 2014</p> 	59.24%		<p>The service has migrated to the OPENRevenues processing system. This system calculates the outturn in a different way to the previous Northgate system. In effect, the OPENRevenues system includes credits on taxpayers' accounts when calculating the collection rate; Northgate didn't. Credits on accounts are amounts that we are due to repay to the taxpayer.</p> <p>This is the reason why the collection rate is above target. We will be working over the next quarter to identify a way in which we can exclude credits in the calculation of the collection rate.</p>	Ian Fitzpatrick

Traffic Light Icon	Code & Short Name	Year to date	Q2 2014/15	Comparison with previous year's quarter / previous year's value if annual PI.	Latest Note	Portfolio Owner
			Value			
	CD_006 National non-domestic rates collected	<p>Latest result for 2014/15 as of September 2014</p> 	54.33%		Performance, even though still below target, has improved on the position at the end of the first quarter. The migration to the OPENRevenues system has meant that the recovery timetable and processes have had to be delayed.	Ian Fitzpatrick
	CD_008 2014 / 15 Decent Homes Programme - reduce the number of homes that do not meet the Decent Homes target	<p>Latest result for 2014/15 as of Q2 2014/15</p> 	0.35%		The Council continues to maintain decency levels for the housing stock at almost 100%. At the end of September the number of non-decent general needs properties was 12. These properties will be repaired or refurbished before the end of the financial year. The final remodelling project for retirement accommodation at Winchester House reached practical completion on the 30th of September. The number of properties that have refused work has reduced to 36 from 56 previously reported. These properties are still classified as decent in accordance with department of Communities and Local Government Guidance. Refusals are closely monitored and the numbers of refusals is diminishing as repairs are completed when properties come vacant or when residents' circumstances change, allowing works to proceed.	Ian Fitzpatrick
	CD_050 Empty privately owned homes returned to occupation as a result of action by EBC	<p>Cumulative result for 2014/15 as of Q2 2014/15</p> 	38		This is a higher than anticipated figure for quarter two 2014/15 and can again primarily be credited via the Council's landlord incentive scheme having a very positive effect as this contributes to 32 of the 38 properties brought back into use during quarter two 2014/15. However five of the longer long term empty properties, those	Ian Fitzpatrick

Traffic Light Icon	Code & Short Name	Year to date	Q2 2014/15	Comparison with previous year's quarter / previous year's value if annual PI.	Latest Note	Portfolio Owner
			Value			
					empty longer than six months, should give sole credit to the work of the Empty Property Officer. The performance level clearly reflects the use that the Council is making of the private rented sector to place and support households in housing need.	
🟢	CD_051 Number of difficult problem properties remedied / brought back into use by the Difficult Property Group	<p>Cumulative result for 2014/15 as of Q2 2014/15</p>	18		Proactive work of the DPG working in partnership with HEDP has remedied 18 difficult properties. It is anticipated that this proactive approach to dealing with the Borough's most difficult properties will continue into the next quarter.	Ian Fitzpatrick
🔴	CD_055 Number of completed adaptations (Disabled Facilities Grants)	<p>Cumulative result for 2014/15 as of Q2 2014/15</p>	17		The number of DFGs completed in this quarter is 17 which is lower than the target figure of 25. This is as a result of works required to adapt residents homes that are now currently in the pricing up and date setting stage for commencement of works rather than completion and formal sign off.	Ian Fitzpatrick
🟢	CD_056 Median average number of days for assistance with adaptations (Disabled Facilities Grants)	<p>Latest result for 2014/15 as of Q2 2014/15</p>	89 days		The number of days taken to deliver a DFG from receipt of application to formal sign off a DFG is well within target standing at 89 days and is much reduced in comparison to the previous quarter.	Ian Fitzpatrick
🔴	CD_156 Number of households living in temporary accommodation	<p>Latest result for 2014/15 as of Q2 2014/15</p>	23		As a snapshot, on the 30th June 2014, the last day of quarter 1, 2014/2015, there were 23 placements in temporary accommodation. Throughout the entire of Quarter 1 of 2014/2015 there have been 56 placements within temporary accommodation, and this is a positive reduction from last quarter.	Ian Fitzpatrick

Traffic Light Icon	Code & Short Name	Year to date	Q2 2014/15	Comparison with previous year's quarter / previous year's value if annual PI.	Latest Note	Portfolio Owner
			Value			
	CD_181 Time taken to process Housing Benefit/Council Tax Benefit new claims and change events	<p>Latest result for 2014/15 as of June 2014</p> 			Due to the migration to a new system we are not in a position to report on this indicator at the present time. We should be able to report by the end of October.	Ian Fitzpatrick
	ECSP_002 Shoplifting rate compared to 2013/14	<p>Latest result for 2014/15 as of September 2014</p> 	9.65%		Sussex Police has recently introduced a new computerised operational and crime recording system, based on a national model which has seen categories of crime increase throughout the force area. Eastbourne has been no exception and has seen recorded crime increase in a number of areas. The new system has highlighted an increase in this category, the period recorded is a short time frame and should see a smoothing out over the period of a performance year.	Ian Fitzpatrick
	ECSP_004 Violent Crime in a Public Place rate compared to 2013/14	<p>Latest result for 2014/15 as of September 2014</p> 	33.83%		<p>Sussex Police has recently introduced a new computerised operational and crime recording system, based on a national model which has seen categories of crime increase throughout the force area. Eastbourne has been no exception and has seen recorded crime increase in a number of areas. The new system has highlighted an increase in this category, the period recorded is a short time frame and should see a smoothing out over the period of a performance year.</p> <p>Eastbourne has been placed in a lower crime Most Similar Group (from September 2014) and is still lower than the median.</p>	Ian Fitzpatrick

Traffic Light Icon	Code & Short Name	Year to date	Q2 2014/15	Comparison with previous year's quarter / previous year's value if annual PI.	Latest Note	Portfolio Owner
			Value			
	ECSP_015 Ranking in our Most Similar Group (MSG) in relation to all crime	<p>Latest result for 2014/15 as of September 2014</p> 	3		The introduction of a new computerised operational and crime recording system which has shown increases of crime, it is worthy of note that Eastbourne is third lowest in overall crime when compared with our Most Similar Group (MSG). From September 2014, Eastbourne has been moved to a lower crime MSG.	Ian Fitzpatrick
	ECSP_016 Serious Acquisitive Crime (robbery, car crime and burglary dwelling) rate compared to 2013/14	<p>Latest result for 2014/15 as of September 2014</p> 	11.93%		<p>Sussex Police has recently introduced a new computerised operational and crime recording system, based on a national model which has seen categories of crime increase throughout the force area. Eastbourne has been no exception and has seen recorded crime increase in a number of areas. The new system has highlighted an increase in this category, the period recorded is a short time frame and should see a smoothing out over the period of a performance year.</p> <p>It is important to contextualise the recent increase in this category with major reductions achieved over previous years.</p>	Ian Fitzpatrick
	TL_017a Redoubt visitors - paying visitors	<p>Cumulative result for 2014/15 as of September 2014</p> 	6,835		A good figure for September due largely to increased visitor numbers on the free Heritage Open Days between the 11-14th. August's increase due largely to our Training Ground Activity	Rob Cottrill

Traffic Light Icon	Code & Short Name	Year to date	Q2 2014/15	Comparison with previous year's quarter / previous year's value if annual PI.	Latest Note	Portfolio Owner
			Value			
	TL_022 Junior (age <=16) participation in sport (number)	<p>Cumulative result for 2014/15 as of September 2014</p> 	80,582		<p>Once again junior participation numbers are up on both target and the previous year. Despite some fantastic weather over the summer our indoor facilities performed really well, especially the Sovereign Centre and Shinewater Sports Centre. The Sovereign Centre is consistently attracting more juniors than in previous years and this is due to their varied programme of activities and their swimming lesson programme. The school holiday programme across the community sports facilities was very well attended, especially at Shinewater. Junior participation for the first 6 months of this year is 13,000 up on last year and 42,000 on 12/13 which is excellent news for Eastbourne.</p>	Rob Cottrill
	TL_026 Total number of theatre users	<p>Cumulative result for 2014/15 as of September 2014</p> 	70,121		<p>Strong first 2 quarters have ensured a busy time, this will continue through the Autumn and Spring, with potential record attendances for the complete year</p>	Rob Cottrill

Overarching commentary : Sustainable Performance – Q2



The Future Model workshops resumed after the summer on time and work continues apace. Specific workshops to support the development of the target operation model (TOM), especially Strategy and Commissioning, have taken place and the TOM is on target for a December draft for consultation. The wider programme remains tight and all partners are working hard to manage risks and resources.



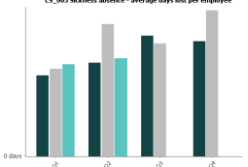

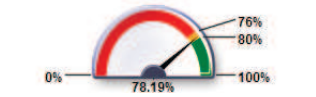
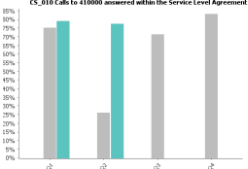


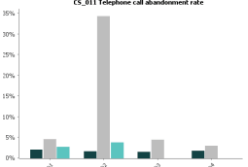
The Lewes Shared Service project has progressed well, with detailed business cases for Legal and Human Resources and roadmaps for three other services being presented to Cabinet in October 2014.


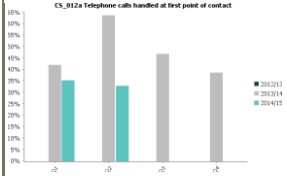
The main project for the Property Team this year, other than the Devonshire Park project, is moving the service to a Corporate Landlord Team. The intention is to begin to put this in place by April 2015. Current work is looking at the most effective way to procure the work of the team and put in place the policies for ensuring a sustainable asset base. That work has shown up a need to better understand the Eastbourne Homes Ltd repairs and maintenance contract (due for renewal in April 2016) and see how we can align with Lewes DC. This means implementation of the Corporate Landlord Model will take until April 2016 to be fully in place.

Sustainable Performance PIs 2014/15


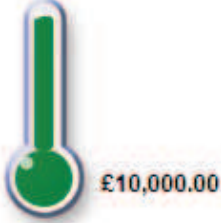
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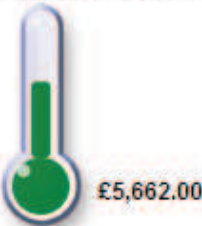

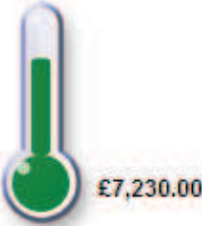
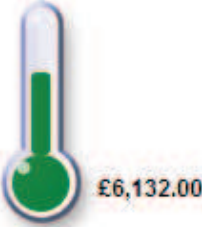
Traffic Light	
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Green	2
Data Only	1

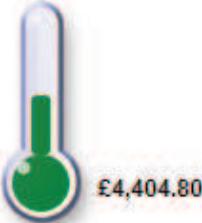
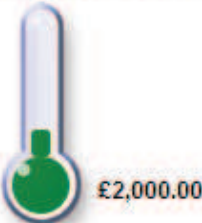
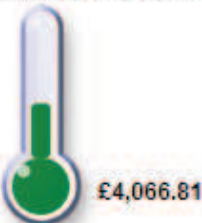
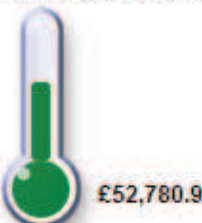
Traffic Light Icon	Code & Short Name	Year to date	Q2 2014/15	Comparison with previous year's quarter / previous year's value if annual PI.	Latest Note	Portfolio Owner
			Value			
	CS_003 Sickness absence - average days lost per employee	<p>Cumulative result for 2014/15 as of Q2 2014/15</p> 	1.26 days		Q2 figure of 1.26 days is in line with previous Q2 figures and renders us on target.	Alan Osborne
	CS_010 Calls to 410000 answered within the Service Level Agreement	<p>Cumulative result for 2014/15 as of September 2014</p> 	77.32%		A significant improvement from the same quarter last year but not quite enough to reach the target. The team have recently started taking calls for licensing and pest control and we have a vacancy and another member of the team on secondment which has impacted on this PI.	Henry Branson
	CS_011 Telephone call abandonment rate	<p>Cumulative result for 2014/15 as of September 2014</p> 	3.63%		Call volumes increased but the abandonment rate continues to remain within the target.	Henry Branson

Traffic Light Icon	Code & Short Name	Year to date	Q2 2014/15	Comparison with previous year's quarter / previous year's value if annual PI.	Latest Note	Portfolio Owner
			Value			
	CS_012a Telephone calls handled at first point of contact	Cumulative result for 2014/15 as of September 2014 33.87%	32.71%		Slight decrease in the percentage resolved at first point but this should start to increase with the recent introduction of the licensing and pest control scripts.	Henry Branson

Devolved Budgets 2014/5

Wards	Gauge	Projects	Project Budget
Devolved Budget Spend - Devonshire	<p>Cumulative result for 2014/15 as of November 2014</p>  <p>£9,946.38</p>	Diwali Project	£300.00
		East of the Pier Heritage Walks	£918.00
		Edible Eastbourne	£1,000.00
		Leaf Hall Seedy Sunday	£500.00
		Redoubt Memorial Garden	£1,298.38
		Salvation Army	£600.00
		Seaside Magic	£2,280.00
		Seaside Rec	£100.00
		Seaside Rec Tree	£250.00
		Steam Punk Festival	£100.00
		Trees – Ceylon Place	£1,000.00
		Venton Centre equipment	£600.00
		West Rise School	£1,000.00
		Devolved Budget Spend - Hampden Park	<p>Cumulative result for 2014/15 as of November 2014</p>  <p>£10,000.00</p>
ESDA Garden	£700.00		
Hampden Park Community Association Refurbishment	£3,000.00		
Hampden Park in Bloom	£600.00		
Nepalese Group	£1,030.00		
Seats – Pigs Lane	£396.00		
Shaftsbury Centre	£1,000.00		
West Rise School	£1,000.00		
Willingdon Trees Community Games	£1,624.00		
Willingdon Trees Sports Event	£450.00		

Wards	Gauge	Projects	Project Budget
Devolved Budget Spend - Langney	Cumulative result for 2014/15 as of November 2014 	Bee project	£1,684.00
		Footpath, Shinewater Community Centre	£978.00
		West Rise School	£3,000.00
Devolved Budget Spend - Meads	Cumulative result for 2014/15 as of November 2014 	St Johns Church Hall	£3,338.92
Devolved Budget Spend - Old Town	Cumulative result for 2014/15 as of November 2014 	Ladies Bowling	£1,230.00
		St Elisabeth's Community Theatre	£1,000.00
		St Michaels and All Angels	£4,000.00
		West Rise School	£1,000.00
Devolved Budget Spend - Ratton	Cumulative result for 2014/15 as of November 2014 	Fence – Willingdon Roundabout	£1,700.00
		Ratton Manor Estate Signage	£432.00
		Trees	£3,000.00
		West Rise School	£1,000.00

Wards	Gauge	Projects	Project Budget
Devolved Budget Spend - St Anthony's	Cumulative result for 2014/15 as of November 2014 	Seaside Rec	£100.00
		Skate World	£1,054.80
		Trees	£750.00
		Trees – Bowood Avenue	£500.00
		West Rise School	£2,000.00
Devolved Budget Spend - Sovereign	Cumulative result for 2014/15 as of November 2014 	Benches – 5 Acre Field	£1,500.00
		Interpretation Board SS Barn Hill	£500.00
Devolved Budget Spend - Upperton	Cumulative result for 2014/15 as of November 2014 	Basil Memorial Dog Show	£980.00
		Eastbourne Allotment and Garden Society	£830.00
		Eastbourne Girls Football Club	£750.00
		Historic Eastbourne Signs	£456.81
		Replacement tree – Churchill Square	£250.00
Street Pastors	£800.00		
Devolved Budget Spend - all wards	Cumulative result for 2014/15 as of November 2014 		

	Current Budget	Profiled Budget	Actual to 30th Sept	Variance	Outturn	Comments
	£'000	£'000	£'000	£'000	£'000	
Corporate Management	267	165	150	(15)	(14)	
Service Management	142	65	38	(27)	(27)	Includes additional grant income
Performance and Risk Managemet	122	99	99	-	-	
Civil Contingencies	27	2	2	-	-	
Finance Management and Operational Costs	560	379	384	5	7	
Corporate Finance Costs	359	344	345	1	-	
Payroll and Information	90	51	53	2	5	
Pensions	608	266	266	-	-	
Financial Services	1,908	1,206	1,187	(19)	(15)	
Service Management	234	162	157	(5)	(7)	
Civic Services (including Printing)	444	249	245	(4)	2	
Elections and Local Land Charges	122	98	109	11	29	
Strategic Performance	92	55	55	-	-	
Legal Services	220	128	142	14	26	
Human Resources Management and Admin	248	122	126	4	4	
Employee Relations	20	18	18	-	-	
Member Development	11	5	1	(4)	(3)	
HR Resourcing and Development	88	38	38	-	-	
Corporate Development	1,479	875	891	16	51	
Service Management	85	43	44	1	2	
IT & E-Government	1,768	951	954	3	7	
Facilities Management	385	280	280	-	(20)	
Customer First	6,504	3,037	3,064	27	(10)	
Estates / Asset Management	(429)	(255)	(260)	(5)	(6)	New Downs Water contract
Corporate Infrastructure and Customer First	8,313	4,056	4,082	26	(27)	
Total Corporate Services	11,967	6,302	6,310	8	(5)	
COMMUNITY SERVICES						
Service Management	(38)	45	41	(4)	(21)	
Housing Services Management	62	63	88	25	(5)	
Revenues and Benefits	320	23,386	23,402	16	30	
Housing Needs	155	125	143	18	35	
Homelessness	168	177	170	(7)	5	
EH Private Sector Housing	196	111	113	2	3	
Bereavement	(952)	(379)	(374)	5	(4)	

	Current Budget	Profiled Budget	Actual to 30th Sept	Variance	Outturn	Comments
	£'000	£'000	£'000	£'000	£'000	
Direct Assistance	(51)	23,483	23,542	59	64	
Community Development	110	64	68	4	15	
Community Involvement	70	36	34	(2)	-	
Community Grants	397	398	398	-	-	
Community Activity	577	498	500	2	15	
Housing / Homelessness Strategy	67	61	53	(8)	(11)	
Solarbourne	(277)	(203)	(206)	(3)	-	
Strategic Partnership	(210)	(142)	(153)	(11)	(11)	
Total Community Services	278	23,884	23,930	46	47	
TOURISM AND LEISURE						
Service Management	98	37	37	-	-	
Sport & Leisure	317	320	338	18	16	
Theatres	739	459	445	(14)	-	
Tourism	513	214	260	46	67	Includes expected shortfall in Dotto Train income
Events & Devonshire Park	506	367	376	9	(3)	
Towner	684	371	371	-	-	
Total Tourism & Leisure Services	2,857	1,768	1,827	59	80	
TOTAL SERVICE EXPENDITURE	15,102	31,954	32,067	113	122	

Transfers (to) and from reserves to be approved by cabinet

Item No.	Amount	Reserve Code	Reserve	Reason
1	£54,150	z10125	Strategic Change Reserve	IT Manager Support
2	£15,000	z10125	Strategic Change Reserve	Procurement Hub Funding
3	£10,000	z10130	Regeneration Reserve	Professional Tennis - town dressing
4	£780	z10128	Revenue Grants Reserve	Local History - Shinewater Dig
5	£7,750	z10112/z10190	Earmarked Reserve/General Fund Reserve	Transfer of some old earmarked reserves to general fund reserve
	<u>£87,680</u>			

Virements over £10k for approval

Item No.	Amount	Service Area	Reason for virement
	From	To	
	£100,000	HRA Management Fee - Void Works	To increase funding for revenue works to void properties
		-£100,000 HRA Provision for Depreciation	

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Scheme	Total Scheme Approved	Scheme spend to 31.3.14	2014-15 Spend as at 30 Sept 2014	Revised Budget 2014-15	Remaining Budget	Funding of Budget 2014-15	Comments for Cabinet report Sept 14
HOUSING REVENUE ACCOUNT							
Managed by Eastbourne Homes	Ongoing		3,073,791	6,290,000	-3,216,209	EBC	On target to complete in 2014-15
Other Schemes							
House Rescue Emergency Fund	200,000	0		200,000	-200,000	EBC	On target to complete in 2014-15
46 Upperton Gardens	20,000	0		20,000	-20,000	EBC	On target to complete in 2014-15
Empty Homes Programme Ph1	2,493,273	667,501	671,607	1,825,772	-1,154,165	EBC/Grant	On target to complete in 2014-15
New Build	4,928,255	73,038	155,971	4,855,217	-4,699,246	EBC/Grant/S106	Full budget will not be spent in 14-15. Re-profiling required in Feb 15
NAHP Programme	3,359,952	0	65,000	3,359,952	-3,294,952	EBC/Grant	Full budget will not be spent in 14-15. Re-profiling required in Feb 15
Total HRA		740,539	3,966,369	16,550,941	-12,584,572		
COMMUNITY SERVICES							
Memorial Safety Cems	40,000	6,080		34,000	-34,000	EBC	On target to complete in 2014-15
Digitalise Burial Records	10,000	0		10,000	-10,000	EBC	On target to complete in 2014-15
Crematorium - Main Chapel	21,000	0		21,000	-21,000	EBC	On target to complete in 2014-15
Ocklynge Cemetery Chapel	150,000	0		150,000	-150,000	EBC/Grant	On target to complete in 2014-15
Barbican Memorial Scheme	5,000	0		5,000	-5,000	EBC	Completion expected October 2014
Main Chapel Refurb - Phase 2	26,000	0		26,000	-26,000	EBC	On target to complete in 2014-15
Disabled Facilities Grants	Ongoing		208,262	677,800	-469,538	Grant	On target to complete in 2014-15
BEST Grant (housing initiatives)	Ongoing		19,784	197,450	-177,666	Grant	Full budget will not be spent in 14-15. Re-profiling required in Feb 15
Social Housing Enabling							
Housing Regeneration - Block Allocation	17,731,000	0		4,731,000	-4,731,000	Grant	Schemes under investigation
Beach Huts (25 New)	235,240	0		235,240	-235,240	EBC	New scheme approved Oct 14
Willingdon Trees Multi Gym	20,000	0		20,000	-20,000	EBC	Community Association looking at options
Total Community Services		6,080	228,046	6,107,490	-5,879,444		
CUSTOMER FIRST							
Contaminated Land	185,000	82,966		102,000	-102,000	Grant	Investigative work on-going
Coast Defences Beach Management Strategy	Ongoing		238,203	540,850	-302,647	Grant	On target to complete in 2014-15
Cycling Strategy	45,000	0		40,600	-40,600	EBC	Detailed design started. Awaiting advice from CLG re seafront bye laws
Park and Ride	50,000	0		50,000	-50,000	EBC	Options being considered
Princes Park (schemes to be decided)	210,000	10,000	755	183,000	-182,245	S106	Bid in progress to secure additional funds.
Play Area Sovereign Harbour	27,000	0		27,000	-27,000	S106	Awaiting open space. Likely to spend in 2015-16
Allotment Upgrade	114,000	99,908		14,100	-14,100	EBC	On target to complete in 2014-15
Hampden Park Skate Park	150,000	5,686	46,358	145,350	-98,992	EBC/S106	On target to complete in 2014-15

Scheme	Total Scheme Approved	Scheme spend to 31.3.14	2014-15 Spend as at 30 Sept 2014	Revised Budget 2014-15	Remaining Budget	Funding of Budget 2014-15	Comments for Cabinet report Sept 14
Five Acre Field - Improvements	55,000	43,483	4,590	11,550	-6,960	S106	On target to complete in 2014-15
Upperton - Play Equipment	60,000	39,482	20,479	20,500	-21	EBC	Completed
Churchdale Road Allotments	38,000	12,774		25,250	-25,250	S106	On target to complete in 2014-15
Play Equipment - Bodium Cres	80,000	0	79,709	80,000	-291	EBC	Completed
Sovereign Harbour - Legal Advice	20,000	0		20,000	-20,000	EBC	Working with Sea Change Sussex
Terminus Road Improvements	500,000	0		500,000	-500,000	EBC	Detailed design work due following stakeholders event in July
Christmas Lights	25,000	0		25,000	-25,000	EBC	Chamber of Commerce have entered a 3 year contract to deliver Christmas lights
CIL - Software	14,000	0	4,393	14,000	-9,608	EBC	On target to complete in 2014-15
Five Acre Field - Railings	20,000	0		20,000	-20,000	EBC	On target to complete in 2014-15
Hampden Park WCs	40,000	0		40,000	-40,000	EBC	Works planned for 2014-15
Highfield Allotments	25,000	0		25,000	-25,000	EBC/Grant	On target to complete in 2014-15
Hyde Gardens WC	40,000	0		40,000	-40,000	EBC	Works planned for 2014-15
Total Customer First		294,300	394,487	1,924,200	-1,529,713		
TOURISM & LEISURE							
Volleyball Court	25,000	0	2,000	25,000	-23,000	EBC	On target
Signage	40,000	23,917		16,100	-16,100	EBC	Completion expected 2015-16
Sports Park Flood Lights	30,000	0		30,000	-30,000	EBC/Grant	Applying for match funding. Spend likely to be in 2015-16
Re-surface Tennis Courts	265,000	0	24	265,000	-264,976	EBC/Grant	Tenders now received. Additional grant funding from LTA
Wish Tower - Catering Outlet	40,000	36,000		4,000	-4,000	EBC	On target to complete in 2014-15
Bandstand Seating	15,000	0	14,981	15,000	-19	EBC	On target to complete in 2014-15
Serco Contract	Ongoing			312,430	-312,430	EBC	On target to complete in 2014-15
ILTC - Air Conditioning	60,000	0		60,000	-60,000	EBC	Works planned for 2014-15
ILTC - Public Address System	20,000	0		20,000	-20,000	EBC	Works planned for 2014-15
ILTC - Electrical System	10,000	0	6,295	10,000	-3,705	EBC	Works planned for 2014-15
ILTC - Fire Alarm	10,000	0		10,000	-10,000	EBC	Works planned for 2014-15
ILTC - Replacement Seating	100,000	0	83,611	100,000	-16,389	EBC	Completed. Retention outstanding.
ILTC - Replacement Showers	25,000	0	18,236	25,000	-6,764	EBC	Completed. Retention outstanding.
Total Tourism & Leisure		59,917	125,148	892,530	-767,382		
CORPORATE SERVICES							
Carbon Reduction Works	467,500	0		467,500	-467,500	EBC	In process of procurement
Agile phase 2	555,000	447,991	5,853	107,700	-101,847	EBC	Remaining spend expected in Q3
Invest to Save	80,000			80,000	-80,000	EBC	Available for allocation
Redesign of CCC at 1 Grove Road	300,000	35,877		264,100	-264,100	EBC	Spend to start in Q3
IT Replacement - Icon	42,500	33,288		9,200	-9,200	EBC	On target to complete in 2014-15
Future Model Phase 2	2,990,000	1,181,493	707,420	818,500	-111,080	EBC	On target. Progress report went to Cabinet July 2014
Capital Contingencies	Ongoing		441,567	0	441,567	EBC	Subject to Legal process

Scheme	Total Scheme Approved	Scheme spend to 31.3.14	2014-15 Spend as at 30 Sept 2014	Revised Budget 2014-15	Remaining Budget	Funding of Budget 2014-15	Comments for Cabinet report Sept 14
Investment Capital	5,750,000	1,150,000		3,000,000	-3,000,000	EBC	Investment due to be made in tranches waiting next draw down
Solar Panels (2nd Programme)	500,000	0		500,000	-500,000	EBC	Delays in procurement. Works expected late 2014-15 and early 2015-16
IT - Block Allocation	Ongoing		100,127	307,500	-207,373	EBC	Windows 7 & MS Office 2010 almost complete. Next phase is email server upgrade
Total Corporate Services		2,848,649	1,254,967	5,554,500	-4,299,533		
Asset Management							
Devonshire Park Review	700,000	0	78,675	700,000	-621,325	EBC	Design Team to be appointed August 2014
Congress Theatre redesign & restoration	1,950,000	41,748	85,777	1,908,250	-1,822,473	EBC	Work due to start August 2014
Bandstand Restoration	245,000	247,000	34,583	18,000	16,583	EBC	Completed
Royal Hippodrome Theatre Ph 1	15,000	0		15,000	-15,000	EBC	Works planned for 2014-15
Downland Pumps Replacement	24,900	0		24,900	-24,900	EBC	Works planned for 2014-15
Hampden Park Hall Improvements	34,700	0		34,700	-34,700	EBC	Works planned for 2014-15
Thatched Shelters - re-roofing	40,000	0		40,000	-40,000	EBC	Works planned for 2014-15
Brick Shelter	65,000	0		65,000	-65,000	EBC	Works planned for 2014-15
Devonshire Park Theatre - rendering	105,000	0		105,000	-105,000	EBC	Works planned for 2014-15
Archery PCs/Bike Store	50,000	0		50,000	-50,000	EBC	Works planned for 2014-15
Motcombe Dovecot	17,000	0		17,000	-17,000	EBC	Works planned for 2014-15
Asset Management - Block Allocation Balance	Ongoing			101,700	-101,700	EBC	Structural maintenance programme has been agreed.
Total Asset Management		288,748	199,035	3,079,550	-2,880,515		
General Fund		3,497,694	2,201,683	17,558,270	-15,356,587		
HRA		740,539	3,966,369	16,550,941	-12,584,572		
Total		4,238,233	6,168,052	34,109,211	-27,941,159		

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Agenda Item 8

BODY:	CABINET
DATE:	10th December 2014
SUBJECT:	Draft Budget Proposals 2015/16
REPORT OF:	Chief Finance Officer
Ward(s):	All
Purpose:	To summarise the main elements of the emerging 2015/16 revenue budget and capital programme that have arisen from the corporate and service financial planning process to date.
Contact:	Alan Osborne, Chief Finance Officer, Tel 01323 415149 or internally on ext 5149
Recommendations:	Members are asked to: <ul style="list-style-type: none">i) Agree the draft budget proposals for consultation.ii) Agree the approach to dealing with changes in the expected resources available for the 2015/16 budget as detailed in 5.3.iii) Agree that subject to there being no material change in the government settlement that Cabinet is minded to propose a council tax freeze for 2015/16.

1.0 Introduction

- 1.1 Each year the Council consults with a range of stakeholders on its detailed draft budget proposals for the following financial year. This follows consultation on the corporate plan and Medium Term Financial Strategy (MTFS), which is carried out over the summer and autumn. The results of the corporate plan consultation are reported elsewhere on this agenda.
- 1.2 The Cabinet will consider initial responses to the consultations at this meeting and finally on 4 February 2015 in order to recommend a final budget for 2015/16 and amended capital programme to the Council on 18th February 2015.
- 1.3 The process of service and financial planning is an integral part of the corporate planning cycle that looks over a medium term horizon. The corporate change programmes under DRIVE pick up the challenge of the MTFS.
- 1.4 The MTFS agreed in July 2014 modelled the overall reduction in Government support by 40% in cash terms over the whole CSR period (2013/17) which equates to around 50% in real terms at past and projected levels of inflation.
- 1.5 At the time of writing this report the Chancellors autumn statement is not

available, However last year the Government signalled a further 5 years of reductions in public spending over the life of the next parliament. Although there is an election next year all the main political parties are working on similar deficit reduction plans.

- 1.6 In addition to changes in the amount of funding for local government, there were two significant changes that came into force in 2013/14 that give a greater volatility to local government finance over the medium term. These changes were the retention of a proportion business rates and the localisation of council tax support. The Council tax and Non Domestic rate tax bases are the subject of another report on this agenda.
- 1.7 The Council has applied with other East Sussex authorities to be part of a single business rates pool which could see the Council increase its business rates retention increase by around £200k in 2015/16.

2.0 Integrated corporate planning process

- 2.1 In July 2014, the Council adopted its latest MTFS that set the platform for the service and financial planning process during the summer and autumn. The strategy set out a further 4 year rolling programme with savings targets of £2.7m recurring by 2018/19 (in addition to the £4.5m achieved in setting the 2011-2015 budgets)
- 2.2 The overarching DRIVE programme forms the basis of Councils efficiency agenda and the sustainable service delivery strategy (SSDS) is a major component of the programme, which will deliver savings over the life of the MTFS. The Council's move towards the "future operating model" is set to contribute a further £1.2m of savings over the next two years to the general fund. Together with savings from procurement and shared services this provides the main emphasis of the current corporate efficiency programme.
- 2.3 The Service and financial planning process is now a rolling three year period to reflect the MTFS and as well as providing £500,000 per annum of additional capital resource the savings programme is well developed to meet the overall target of £2.7m over the current cycle.
- 2.4 Consultation on these plans began at the same time which included Scrutiny, unions and staff as well as partner organisations and the public. A separate report is included on the agenda with an update.
- 2.5 Once the budget proposals have been adopted in February, the service plans will be updated and resource allocations reviewed in the light of any changes required by corporate plan priorities or the budget.
- 2.6 The Service plans will then be used to set service performance measures and individual staff performance and development plans.
- 2.7 Formal integrated quarterly performance monitoring against the budget and key performance indicators informs the Council and its stakeholders of progress against the plans.

3.0 Background to the Budget Proposals

- 3.1 The MTFS set out the principles for the budget of the following four years and models the financial impact of the strategy.
- 3.2 The main backdrop to the MTFS is the requirement to set a balanced budget and dealing with the effects on the Councils finances of the current economic downturn.
- 3.3 The current strategy set out a rolling three year plan to:
- Deal with the anticipated reduction in the Government support of a further 40% from the 2014/15 level.
 - Integrate fully the service and financial planning process with the main change programmes under DRIVE
 - Work with clearly defined medium term efficiency targets to the corporate transformation programmes and allow services to put forward savings proposals in addition.
 - Deal with the continued economic downturn and unavoidable growth in service demands
 - Maintain front line services to the public
 - Make further recurring savings of £2.7m per annum by 2016/17
 - Maintain at least a minimum level of reserves of £2m
 - Use surplus reserves in the medium term for:
 - Invest to save projects
 - Smooth the requirement for savings over the cycle of the MTFS
 - Invest in one off service developments in line with the corporate plan
 - Benchmark fees & charges against the service standard
 - Reinvest in value adding priority services when headroom is created
 - Set council tax rises at zero or at the level of target inflation (CPI)
 - Maintain a Strategic Change Fund to finance the DRIVE programme in order to increase efficiency
 - Maintain an Economic Regeneration Reserve to finance external interventions that promote economic activity
 - Finance capital expenditure from identified resources
 - Use borrowing only on a business case basis
 - Continue the process of priority based budgeting to target investment and differential levels of savings targets at services according to priority
 - Zero base volatile grant budgets
 - Look for new income streams to supplement diminishing resources
- 3.4 Whilst at the time of writing the final settlement in respect of revenue support grant (RSG) and retained business rates for 2015/16 as well as numerous other grant announcements have not yet been made, the following are assumed in the draft budget.

Year	2014/15	2015/16
	£m actual	£m
RSG	(3.7)	(2.6)
Retained Rates	(4.0)	(4.0)

Council Tax freeze grant	(0.1)	(0.1)
New Homes Bonus	(0.9)	(1.3)
Council Tax	(7.2)	(7.3)
TOTAL	15.9	15.4

4 The Emerging Budget Proposals 2015/16

- 4.1 The service and financial planning process started in July and has culminated in the four service areas presenting their plans to the Cabinet and shadow cabinet in November.
- 4.2 In response the challenge set out in the MTFs, the service and financial planning process has identified proposed savings of £1.509m (10% of net spend) shown in **(appendix 1)**

These are categorised as:

	<u>£m</u>
Efficiency savings	(0.992)
Increases in income	(0.461)
Other changes	<u>(0.056)</u>
Total	<u>(1.509)</u>

- 4.3 A total of £0.947m of service growth is proposed categorised as follows **(appendix 2):**

	<u>£m</u>
Corporate inflation	0.515
Reduced income targets	0.224
Other Growth	<u>0.208</u>
Total	<u>0.947</u>

- 4.4 The draft budget assumes no rise in Council Tax for 2015/16 as the Council is may take advantage the special grant available for Councils not increasing council tax (assumed to be 1% or £85,000) There therefore remains a choice depending on the final announcement of the tax freeze scheme. A referendum might apply if any proposed tax rise were 2% or greater.
- 4.5 The proposal also includes £487,000 of non-recurring service investment to be financed directly from reserves **(Appendix 2).**

5.0 Summary of Revenue Proposals

- 5.1 The following is a summary of the effect of the proposed changes.

5.2		<u>Proposal</u> <u>£m</u>
	Base Budget 2013/14	15.902
	Growth (outlined in 4.3)	0.947
	Savings (outlined in 4.2)	<u>(1.509)</u>
	Net budget requirement	<u>15.340</u>
	Funded By:	
	Government Grants/Retained Rates	(8.041)
	Council tax (band D £224.19)	<u>(7.299)</u>
	Total Resources	<u>(15.340)</u>
	Forecast General Reserve 31.03.14	£4.2m

5.3 Should the resources assumed by way of retained business rates and RSG differ, the suggested strategy would be to make any additional resources available to the capital programme. Should the resources be less than the assumptions then they should first reduce the contingency by up to £100,000 and beyond that, a further review of the service and financial plans will be required to identify additional savings/reduced growth. As a last resort the MTFs allows for reserves to be used in the short term until further corrections can be made.

6.0 Capital Programme 2014/19

- 6.1 The Council currently finances its capital programme from capital receipts and grants and contributions. There is currently c£0.5m of internal identifiable capital resources available for the next three years.
- 6.2 It is intended that any revenue headroom created by the 2015/16 revenue budget will be reinvested in the Capital programme.
- 6.3 In addition to these resources, borrowing is permitted on a business case basis where savings or new income generated from a scheme can repay the capital costs.
- 6.4 Additional individual schemes to be added to the capital programme linked to priorities will be developed in January and contained in the final budget and capital programme proposals to be agreed by the Full Council in February.
- 6.5 It should also be noted that unlike the Council Tax, the capital programme can be varied at any time and that there are duties under certain schemes to consult with those affected before schemes are commenced. As well as schemes financed from internal resources, the corporate plan will include schemes financed from external resources.

7.0 Consultation

7.1 As outlined in sections 1 & 2, consultation is planned both internally and externally to supplement the comprehensive consultation programme to date which is reported elsewhere on the agenda.

8.0 Implications

8.1 None directly in respect of this report, the consultation with stakeholders will identify any significant implications, which will be reported alongside the final budget recommendations in February.

9.0 Conclusions

9.1 The Council is well placed to deal with the lasting effects of the economic downturn and subsequent reduction in support by The Government cuts however has restricted choice in respect of new services requiring recurring investment.

9.2 Should the budget proposals remain materially intact following consultation and further announcements, The Council will have continued to shift its basic financial position towards longer term sustainability as outlined in the MTFS.

Alan Osborne
Chief Finance Officer

Background Papers:

The Background Papers used in compiling this report were as follows:

Budget 2013-14

Cabinet Reports: – Finance Matters Each Cabinet Meeting
- Budget Setting February 2014.
- MTFS July 2014.

Audit Committee- Final Accounts- September 2014.

To inspect or obtain copies of background papers please refer to the contact officer listed above.

Proposed Savings

Dept	Service	Proposal	2015/16 £'000
Efficiency Savings			
CorpS	High Level Service	Future Model phase 2	(600)
CorpS	CMT	Shared CMT/EMT roles	(100)
CorpS	Financial Services	Reduced audit fee	(20)
CorpS	Financial Services	Bank contract savings	(10)
CorpS	IT and E Government	Decommission Northgate Revs and Bens system	(58)
CorpS	IT and E Government	Cease Northgate DBA support	(15)
CorpS	IT and E Government	Migration to The Link	(11)
CorpS	IT and E Government	Consolidate systems support costs	(6)
ComS	Bereavement Services	Gas savings	(13)
ComS	Revs & Bens	Capita telephone contract (part year)	(105)
CFirst	Specialist Advisory Team	Waste Contract final savings on contract procurement	(50)
TS	Events	Reduced postage	(2)
TS	Events	Walking festival partnership with Wealden	(2)
Efficiency Savings Total			(992)
Income Generation			
CorpS	High Level Service	Future Model Accommodation co location with EHL/ other partners	(170)
CorpS	Corporate Property	Letting space in Town Hall to SCDA	(25)
CorpS	Corporate Property	Lease management improvements	(79)
CorpS	Corporate Property	Rent review Bullockdown small holding	(2)
CorpS	Corporate Property	Water rate increase to let farms and recovery of maintenance costs	(3)
ComS	Bereavement Services	RPI on fees	(45)
ComS	Bereavement Services	Tribute screens	(7) *
ComS	Revs and Bens	Income target for Fraud team to replace reduced grant	(57) *
TS	Events	Increase income target	(8)
TS	Events	Introduce an off-road half marathon as part of Beachy Head Marathon	(15)
TS	Sports and Leisure	Increase income target	(20)
TS	Theatres	Additional show account income	(10)
TS	Theatres	Additional refreshment sales at Congress Theatre	(5)
TS	Theatres	Additional internet booking fees	(5)
TS	Tourism	Additional income from beech huts	(5)
TS	Tourism	Additional income from Airbourne exclusive seating	(5)
Income Generation Total			(461)
Other Changes			
CorpS	Financial Services	Reduction in unfunded pensions	(30)
TS	Sports and Leisure	Reduction in equipment budget	(9)
TS	Tourism	Improved programming Bandstand	(10)
TS	Tourism	Reduction in equipment budget	(7)
Other Changes Total			(56)
TOTAL SAVINGS			(1,509)

* Linked savings & growth items

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Recurring Growth

Dept	Service	Item	2015/16 £'000
Corporate Inflation			
Corporate		Pay Award, contractual increments and pension auto enrolment	240
Corporate		Inflation on external contracts and other inflation	250
Corporate		Increase in minimum wage	25
Corporate		Capital Financing (Target £100,000 to be confirmed)	TBC
Corporate Inflation Total			515
Changes in Income targets			
CorpS	Financial Services	Concessionary Fares income service transferred to ESCC	6
ComS	Revenues and Benefits	Bailiff income reduced due to government change in cost recovery	23
ComS	Revenues and Benefits	Reduction in DWP admin grant for fraud	57 *
ComS	Revenues and Benefits	Reduction in HB admin grant	32
ComS	Revenues and Benefits	Reduction in DCLG CTRS grant	7
CFirst	Specialist Advisory Team	Roundabout sponsorship	9
TS	Tourism	Dotto train income target unachievable	65
TS	Tourism	Leisure travel marketing	25
Changes in Income Total			224
Other Growth			
CorpS	Civil Contingencies	East Susses resilience and emergency planning	3
CorpS	Financial Services	Cash Collection contract	23
CorpS	Human Resources	Recruitment 'lovelocaljobs' scheme	4
CorpS	IT and E Government	Mobile telephony increase in number of contracts as envisaged in Agile programme	11
CorpS	IT and E Government	Locata Housing system maintenance	10
CorpS	Corporate Property	Restructure for Corporate Landlord model	80
CorpS	Corporate Property	Water infrastructure new maintenance contract	23
CFirst	Specialist Advisory Team	Splash pad water usage greater then originally estimated	5
CFirst	Specialist Advisory Team	Eastbourne Park ditch maintenance	10
CFirst	Neighbourhood First	Supply of dog bags for dispensers	1 *
TS	Events	Permanently fund Proms Big screen event	7
TS	Events	Permanently fund Beer and Cider Festival	14
TS	Events	Permanently fund Cycling Festival	4
TS	Events	Devonshire Park Grounds to bring budget to current standards	8
TS	Sports and Leisure	Administration to tennis delivery partner	5
Other Growth Total			208
TOTAL PROPOSED RECURRING GROWTH			947

Non Recurring Service Investments

Group	Service	Proposal	
CorpS	Corporate Property	Specialist advice for the Asset Challenge programme	30
CorpS	Corporate Property	Downland Strategy review	20
ComS	Revenues & Benefits	Empty Homes review	20
ComS	Revenues & Benefits	SMS messaging for payment recovery	5
ComS	Revenues & Benefits	Single persons discount review	6
ComS	Community Involvement	Contribution to Local Dementia action plan	10
ComS	Community Involvement	Single Equality Scheme implementation	5
ComS	Community Development	Grants to voluntary organisation	23
ComS	Community Development	Langney Village Hall match funding for works	5
Cms	Bereavement	Books of Remembrance	8
Cms	Bereavement	Replace waiting room furniture	7
ComS	Bereavement	Installation of visual media in both Chapels	10
Cms	Bereavement	Installation of Webcasting	2 *
CFirst	Neighbourhood First	Supply one dog bag dispenser in each ward targeted at dog fouling hotspots	2
CFirst	Specialist Advisory Team	Supporting Eastbourne Jobs Hub	35
CFirst	Specialist Advisory Team	Allocation for priority parks and gardens maintenance schemes	100
CFirst	Specialist Advisory Team	Strategic Housing Market assessment	20
CFirst	Specialist Advisory Team	Employment Land Local Plan examination costs	15
CFirst	Specialist Advisory Team	Seafront Local Plan	15
CFirst	Specialist Advisory Team	Strategic Housing Land availability	10
CFirst	Specialist Advisory Team	Bollards and boulders at Fishermans Green	6
TS	Events	Aegon International Tennis	33
TS	Events	Aegon International Tennis Town Dressing	10
TS	Events	Devonshire Park Laser Line Marker	5
TS	Events	Summer Music Festival	25
TS	Events	Big Screen hire for sporting events such as Aegon Finals and Rugby World Cup	20
TS	Sport and Leisure	Tennis Court Refurbishment fund for future repairs part of grant conditions	32
TS	Tourism	Drinking Fountains on the Seafront	8
TOTAL NON RECURRING INVESTMENTS			487

* Linked savings & growth items

Body:	Cabinet
Date:	10th December 2014
Subject:	Council Tax Base and Business Rate Income 2015/16
Report Of:	Chief Finance Officer
Ward(s)	All
Purpose	To approve the Council Tax Base and net yield from Business Rate Income for 2015/16 in accordance with the Local Government Finance Act 1992, as amended.
Decision Type:	Key Decision
Recommendations:	Members are asked to <ul style="list-style-type: none">i) Agree the provisional Council Tax Base of 32,558.9 for 2015/16.ii) Agree the provisional Retained Business Rates Income of £34.8m for 2015/16.iii) Agree that the Chief Finance Officer, in consultation with the Portfolio Holder for Finance, determine the final amounts for the Council Tax Base and Retained Business Rates income for 2015/16.
Contact:	Pauline Adams, Financial Services Manager Tel 01323 415979 or internally on ext 5979

1.0 Introduction

- 1.1 The Council is required to set its Council Tax Base and the expected Business Rate Income for the forthcoming year. These calculations are used as the basis for the amount of income the Council will precept from the Collection Fund.
- 1.2 The Local Authorities (Calculation of Council Tax Base) Regulations 1992 prescribe that the billing authority (this council) must supply the precepting authorities (the County, Police and Fire authorities) with the calculation of the Council Tax Base. This information must be supplied between 1 December and 31 January in the financial year proceeding the financial year for which the calculation is being made.
- 1.3 Non-Domestic Rating (Rates Retention) Regulations 2013 also sets out a timetable for informing the government and precepting authorities of the business rate income calculation. This information is completed via a government return (NNDR1) which must be submitted by 31 January in the financial year proceeding the financial year for which the calculation is being made.

1.4 In order to assist the precepting authorities with their financial planning it is helpful to provide the information during December rather than wait for the January deadline.

2.0 Council Tax Base

2.1 The Council Tax Base is the estimated full year equivalent number of chargeable dwellings. This is expressed as the equivalent number of Band D dwellings with two or more liable adults.

2.2 In making this estimate, account must be taken of discounts, disablement relief and property exemptions. Movements on and off the Valuation List during the year must also be taken into account – e.g. where new properties have been built or old ones converted or demolished.

2.3 The primary legislation that determines how the Council Tax Base is to be calculated is the Local Government Finance Act 1992. A number of regulations have been laid under this Act that has prescribed how the detailed calculation is to be made. Those regulations are listed at the foot of this report.

2.4 The basic calculation as determined by the primary legislation is that the Council arrives at its Council Tax Base by multiplying its Relevant Amount by its estimated Collection Rate.

3.0 Relevant Amount

3.1 The Relevant Amount for each Band is the estimated full year equivalent number of chargeable dwellings in the Band expressed as the equivalent number of Band D dwellings. For example, a Band A property is equivalent to 6/9 of a Band D property, a Band H property is equivalent to 2 times (18/9) a Band D property. The Relevant Amounts for each Band are then added together to arrive at the overall Band D equivalent.

3.2 The results for each Band when totalled up are converted to form the appropriate number of Band D equivalent dwellings. This is the Relevant Amount. For 2015/16 this totals 33,308.3.

3.3 The Relevant Amount has increased by 358 properties (1.32%) Band D equivalent dwellings from 2014/15. This reflects an increase in the number of taxable properties and a reduction in the number of Single Person Discounts awarded. The effect of these changes has resulted in an increase to the total number of chargeable dwellings of 459.

4.0 Collection Rate

4.1 The Collection Rate is the Council's estimate of the proportion of the overall Council Tax collectable for 2015/16 that will ultimately be collected. This is expressed as a percentage.

4.2 The key elements in making this calculation are losses on collection, appeals

against valuation, changes in circumstances (e.g. applications for discounts in respect of single person occupancy or disability) and other adjustments. These other adjustments to bills can arise for a variety of reasons including bankruptcy, death and exemption where premises are unoccupied for reasons allowed by the Exempt Dwellings Order. The Council must also make provision for uncollectable debts.

4.3 Given the current level of Council Tax collection and the forecast of a small surplus balance on the collection fund there is the opportunity to set the collection rate at 97.75% for 2015/16, an increase of 0.25% over 2014/15.

5.0 Council Tax Base

5.1 Taking the Relevant Amount of 33,308.3 and applying the Collection Rate of 97.75% produces a Council Tax Base for 2015/16 of **32,558.90**.

5.2 The Council Tax Base has increased by 1.35% compared with 2014/15. This is equivalent to an increase of 432 Band D dwellings. The detail number of properties is shown at Appendix 1.

5.3 The Council's Medium Term Financial Plan is updated annually to take account of movements in the Council Tax Base. The assumed tax base for the current MTFs was 32,126.

6.0 BUSINESS RATE INCOME

6.1 The Local Government Finance Act 2012 introduced a new system for the local retention of business rates. This means that the council is required to formally approve the expected business rate income for the forthcoming year. The estimate for the 2015/16 financial year must be approved by 31 January 2015.

6.2 The Business Rate income is all collated on the NNDR1 form which will show the net rate income yield for the forthcoming year and the central and local shares of the business rates. The actual NNDR1 form for 2015/16 has not yet been received but the provisional figures based on the 2014/15 form plus known changes has been calculated as follows:

Retained Business Rate	2015/16 Estimate £'000
Gross Rates Yield	39,539
Less Mandatory Reliefs	(3,877)
Less Discretionary Reliefs	(42)
GROSS RATE YIELD AFTER RELIEFS	35,620
Less Allowance for cost of Collection	(127)
Adjustments for Changes in RV due to growth or reduction in property numbers.	30
Less Estimated Losses on Collection	(394)
Less Allowance for Appeals	(325)
NET BUSINESS RATE YIELD	34,804

The adjustment for the changes in RV includes the properties that are to be demolished as part of the Town Centre redevelopment, however once the redevelopment work has been completed there will be a corresponding growth in the business rate yield.

6.3 The net business rate yield is allocated centrally and locally based on the following ratios:

- 50% to Central Government
- 40% to the Local Billing Authority (this council)
- 10% to the other precepting authorities (9% to the county and 1% to the fire authority)

The local share (the Business Rate baseline) is then payable to the Council's general fund. All other adjustments to the overall level of business rate income retained locally are then accounted for within the general fund.

7.0 Retained Business Rates income in the General Fund

7.1 As some local authorities collect more business rates than they currently receive in formula grant (which is based on relative need and resources), whilst others are lower, the government will rebalance to ensure that no local authority is worse off as a result of its business rates at the outset of the scheme through a system of tariffs and top ups. To calculate these tariffs and top ups a business rate baseline funding level has been set by government based on the 2012/13 formula grant funding levels. An authority will pay a tariff if their business rate baseline is more than their baseline funding level and receive a top up if their business rate baseline is less than their baseline funding level. Tariff and top ups will be self funding and fixed in real terms (i.e. only up rated by RPI) in future years, ensuring that changes in retained income are driven by business rate growth.

This authority has a business rate baseline higher than its baseline funding level and thus is due to make a tariff payment.

7.2 The intention of the Rates Retention scheme is to give an incentive to local authorities to grow their business rate base, and the scheme has been devised to allow local authorities to benefit from this growth. However due to the gearing effect, i.e. the differences in the relationship between an individual authority's business rates base and its baseline funding level, some authorities with existing large tax bases in relation to their funding levels will experience increases in their income that is out of proportion to the growth in their business rate base. To moderate this gearing effect a system of levies and safety nets has been introduced.

The levy rate will allow authorities to retain their growth in an equivalent proportion to its baseline revenue. This translates into a real benefit and after the payment of the central share and the levy at least 20p in each extra pound will be retained locally.

Conversely a safety net will apply to any authority experiencing a decrease in their business rates revenue. This safety net guarantees authorities 92.5% of their original baseline funding. For the purpose of the safety net the

baseline funding level will be increased by RPI each year.

- 7.3 The estimated amount of retained business rates to be credited to the general fund is calculated as follows:

2015/16 Estimate	£'000
EBC Share of Business Rate Yield	13,921
Minus Tariff	(10,124)
Minus Levy	(564)
Minus Estimated Deficit on Collection Fund as at 31.3.15	(526)
Add Section 31 Grants	1,272
Local Retained Business Rate Income 2015/16	3,980
2014/15 Amount	3,725

These figures will be confirmed once the final NNDR1 has been completed in January and the government grant settlement figures received later this month.

8.0 Setting the Business Rate Income

- 8.1 The figures required to set the business rate income are not yet available as the final NNDR1 form and guidance notes have not yet been received from DCLG. Cabinet is therefore asked that delegated authority be given to the Chief Financial Officer, in consultation with the Portfolio Holder for Finance, to determine the final estimated net yield from Business Rate Income for 2015/16.

- 8.2 The revenue implication of the new Business Rates retention scheme has been modelled into the financial plan and will be fully reflected in the budget setting process.

9.0 Business Rates Pooling

- 9.1 Cabinet agreed at its meeting on 22 October 2014 to enter into a business rate pool with the other East Sussex Borough and District Councils, East Sussex County Council and East Sussex Fire Authority. An application has now been submitted to DCLG and the outcome is expected in January.
- 9.2 Under pooling the levy as set out in para 7.2 will be payable to the pool rather than to DCLG, and redistributed to participating authorities in accordance with the agreed memorandum of understanding. This is to be used to fund economic development.
- 9.3 The split of the potential proceeds based on business rate forecasts indicates that this Council can expect to receive a sum in the region of £223k, the precise amount will not be known until the end of the 2015/16 financial year and payment made in 2016/17.

10.0 Collection Fund Performance

- 10.1 As at 31 March 2014 the Collection fund showed a deficit of £3,127,280 (£79,171 Council Tax and £3,048,109 Business Rates). £2,165,775 is being recovered across Council Tax and Business Rates preceptors during 2014/15, leaving a balance of £961,505 to be distributed in 2015/16.
- 10.2 The Council has to estimate the overall surplus/deficit at 31 March 2015 and inform the precepting authorities in January 2015 of this estimate in order that the amount is included in the 2015/16 precept figures.
- 10.3 Current monitoring figures indicate a surplus by 31 March 2014 of £172,950 for Council Tax, this will be revised in January and the results reported to members as part of the budget report to the February Cabinet. Any surplus or deficit is allocated to preceptors in 2015/16 in proportion to the 2014/15 Band D Council Tax.
- 10.4 The calculation on the business rate income element of the Collection Fund currently indicates a deficit balance of £1,314,000 as a result of a bigger than anticipated provision made in 2013/14 for outstanding appeals, giving rise to a higher than budgeted balance carried forward at 1.4.2014. The calculation will be revised for January and the results reported to members as part of the budget report to the February Cabinet. Any surplus or deficit is allocated in 2015/16 in accordance with the proportions given at 6.3 above.

10.0 Consultation

- 10.1 Not Applicable

11.0 Implications

- 11.1 The Council Tax Base will be used to calculate the level of Council Tax requirement that will be recommended to the Council on 18 February 2015.
- 11.2 The net yield from Business Rates income will be used to calculate the amount of retained business rates to be credited to the General Fund.
- 11.3 Once the Council Tax Base and the estimated balance on the Council Tax element of the Collection Fund has been determined, East Sussex County Council, Sussex Police and Crime Commissioner and East Sussex Fire Authority will be notified.
- 11.4 Once the NNDR1 2015/16 has been completed and the estimated balance on the Business Rate element of the Collection Fund has been determined, this will be submitted to Central Government and both East Sussex County Council and East Sussex Fire Authority will be notified.

12.0 Summary

- 12.1 The provisional Council Tax Base for 2015/16 has been calculated in accordance with relevant legislation. Summary calculations are set out within the attached appendix.

- 12.2 The figures required to set the business rate income are not yet available as the final NNDR1 form and guidance notes have not yet been received from DCLG. Provisional figures indicated business rates income for the General Fund of £3,980,000.
- 12.3 It is recommended that delegated authority be given to the Chief Finance Officer, in consultation with the Portfolio holder for Finance, to agree the final figures for both calculations.

Pauline Adams
Financial Services Manager

Background Papers:

The Background Papers used in compiling this report were as follows:

The Local Government Finance Act 1992

The Local Authorities (Calculation of Council Tax Base) Regulations 1992

The Local Authorities (Calculation of Council Tax Base) (Amendment) Regulations 2003

Non-Domestic Rating (Rates Retention) Regulations 2013

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Tax Base Comparison between years			
	2013/14	2014/15	2015/16
NUBER OF DWELLINGS			
Valuation List as at November	46,629	47,150	47,285
Less discounts equated to property numbers	-4,859	-4,966	-4,753
Total equivalent property numbers	41,770	42,184	42,532
Estimated changes in year	86	-19	55
Less Local Council Tax Reduction Scheme	-6,813	-7,504	-7,465
Total Number of Properties	35,043	34,661	35,122
% decrease		-1.09%	1.33%
TAXBASE CALCULATION			
Relevant Amount (Band D Equivalent)	33,309.3	32,950.3	33,308.3
Collection Rate	97.50%	97.50%	97.75%
Council Tax Base	32,476.6	32,126.5	32,558.9
% decrease		-1.08%	1.35%

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Body:	CABINET
Date:	10 December 2014
Subject:	Sustainable Service Delivery Update
Report Of:	Chief Finance Officer and Senior Head of Infrastructure
Ward(s)	All
Purpose	To update Members on the progress made within the SSDS programme, with particular reference to the draft Target Operating Model (TOM) for Phase Two of the Future Model implementation.
Recommendation:	Members are asked to: <ul style="list-style-type: none">i) Approve the principles of the draft Target Operating Model as detailed in the report, in order to enable consultation to begin.ii) Delegate authority to the Chief Executive to approve any necessary changes to the Target Operating Model that arise from consultation.
Contact:	Henry Branson, Senior Head of Infrastructure, Telephone 01323 415155 or internally on extension 5155. Henry.branson@eastbourne.gov.uk

1.0 Background/Introduction

1.1 The Sustainable Service Delivery Strategy (SSDS) is a key response to the increasing cost and demand pressures facing the Council. It is a programme that was developed to promote a range of solutions, both internal transformation and effective partnership working with other organisations.

The Medium Term Financial Strategy (MTFS), as approved by [Cabinet in July 2014](#) includes savings targets for the SSDS as a whole.

This report presents an update on the Future Model (Phase Two), one of the major programmes being implemented under the banner of the SSDS.

1.2 SSDS: Future Model

In July 2013 Cabinet approved the adoption and implementation of Phase Two of the Future Model under Option 5 of the SSDS and delegated authority to the DRIVE Programme Board to run the programme within the allocated resources.

The Future Model Programme aims to improve service delivery whilst delivering savings estimated at £1.7m to £2m across the council and Eastbourne Homes Ltd (EHL). The current phase, Phase Two, is estimated to save £1.2m - £1.5m.

The Future Model describes a new way of organising and delivering council services, delivering efficiencies at the same time as putting the customer at the heart of all we do. Further details are available in the [July 2013 Cabinet report](#).

2.0 Future Model Programme Update

2.1 Summary of programme status

In October 2014 Cabinet received an update on the status of the programme. The key milestones have not changed since that update and we are on target to meet those milestones.

At that meeting, Cabinet approved the new structure for the council's Corporate Management Team (CMT) which would generate additional savings of £200,000 in addition to the aggregate savings of £500,000 that have been achieved since 2009. These savings were anticipated as part of the Phase Two business case. Cabinet delegated authority to the Chief Executive to progress formal consultation with current CMT officers and then appoint to those roles in line with standard HR policies and procedures. That consultation process is currently underway.

Cabinet was advised that the next key programme milestone was the publication of the draft Target Operating Model (TOM) for consultation with council and EHL staff, council members, EHL Board members and Unison. This will form the focus for the remainder of this report.

3.0 Draft Target Operating Model

3.1 What is the TOM and how is it developed?

The TOM outlines the significant structural changes to the council and Eastbourne Homes Ltd that arise from applying the Future Model to both organisations.

The TOM provides details of how roles and responsibilities for housing management will be aligned between the council and Eastbourne Homes Ltd in order to maximise efficiencies, create improved customer journeys and yet ensure that the benefits of having a dedicated housing management organisation are retained.

It also includes the expansion of the Customer First structure that was created in Phase One, the creation of a number of additional service delivery units and the strategic core of the organisation, referred to as Strategy and Commissioning.

The TOM will consist of a full set of role descriptions, job descriptions and person specifications which have been evaluated through our corporate job evaluation scheme.

The TOM is developed as a result of the output from the service redesign workshops that form part of the 'Create and Construct' project (referred to as Business Process Re-engineering in Phase One). In these workshops, led by our change management partner Ignite, staff review the way that services are

currently delivered, and then apply Future Model principles to move different tasks into the appropriate part of the Future Model structure. Activity analysis enables us to calculate the number of roles required in each part of the structure, taking into account efficiencies enabled through technology and process changes.

It is important to note that the Create and Construct project is still ongoing, and some services have not yet been redesigned. This was anticipated at the start of Phase Two, and the workshop schedule was designed to ensure that those services which had the biggest bearing on the TOM would be redesigned by the time the draft TOM was published for consultation. By the time the TOM is finalised post-consultation, most workshops will have been completed and the TOM will be adjusted to reflect the consultation feedback and the output from the additional workshops. As such, **final role numbers will change** and any numbers of Full Time Equivalent (FTE) roles shown in this report only represent the calculations at the time of publication.

3.2 **Strategy and Commissioning**

Under the Future Model, Strategy and Commissioning (S&C) represents the activity and resource required to translate political will and ambition and ensure that Eastbourne Borough Council is a successful, accountable and capable public authority. It is the only part of the Future Model structure which could not be delivered in partnership with other private sector bodies, since it is what makes the council unique.

This activity involves:

- Collaboration and partnership between CMT and political members
- Community leadership
- Community and customer engagement, insight and intelligence
- Strategy and policy development
- Designing and commissioning how outcomes should get delivered
- Corporate programme and project management
- Finding resources - partnerships, funding
- Strategic performance and contract management
- Activity to support democratic processes, including the management of elections

S&C is a concept rather than a department or single team. There will be S&C roles in all departments. S&C managers will report to members of CMT, and will manage both other staff in S&C roles and staff involved in 'delivery units' (see paragraph 3.3 below).

The current number of S&C roles and their alignment to different CMT roles is shown in Appendix 1: Figure 1 below.

3.3 **Delivery Units**

The roles which do not form part of S&C sit in business units. These business units could be in house (e.g. Customer First), separate companies (e.g. Eastbourne Homes Ltd) or shared services (e.g. HR, Legal).

A fundamental principle of the Future Model is that any of the council's functions, aside from the S&C functions, could be fulfilled or commissioned via a range of different mechanisms, from in house delivery to outsourced, third sector or shared services delivery models.

The relationship between CMT roles and delivery units is shown in Appendix 1: Figure 2 below.

The largest delivery unit will be Customer First, which was set up in Phase One and will grow further in Phase Two, see paragraphs 3.5 to 3.10 below. Two new delivery units will be established: one for Sports, and one for Seafront and Events. Some delivery units will not be remodelled by Phase Two and these are shown as Phase Three or Out of Scope on the diagram.

3.4 **Housing Functions and the role of Eastbourne Homes Ltd**

The draft TOM proposes an enhanced Neighbourhood Management role for EHL. Recognising EHL's strengths in working closely with communities, focusing on complex cases, vulnerable families and outreach work, the TOM proposes to widen the scope of EHL's current functions.

In addition to the existing functions of tenancy management, resident involvement and community initiatives, EHL will assume responsibility for a wider range of housing and neighbourhood functions, including:

- An improved customer journey joining up allocation through to tenancy sign up.
- A joined up approach to neighbourhood issues such as anti-social behaviour and noise, concerning both tenants and non-tenants.
- Complex cases involving welfare advice, homelessness and debt.
- Problems with other landlords, e.g. disrepair, damp, leaks.

An essential component of the proposed new model sees EHL working as part of a 'Neighbourhood First Partnership' with the council, police and the wider community, adopting a joined-up, zone-based way of working. EHL neighbourhoods would be aligned to Sussex Police neighbourhoods and Neighbourhood First zones to support focussed, multi-agency working.

The TOM also sees a transfer of other, less complex activities from EHL to Customer First, including customer contact across a range of channels and processing of straightforward applications and cases. Members will also be aware that EHL corporate services staff have already transferred to the council.

The TOM shows a dotted reporting line from the EHL Property Service to the council's CMT lead for Regeneration, Planning and Assets, to reflect the link with the council's Corporate Landlord Model planned for implementation in 2016 when the current EHL repairs and maintenance contract is due for renewal. See the previous two SSDS Cabinet papers for further details.

Other functions of EHL are unaffected by the TOM, such as the STEPS service that is delivered under contract to East Sussex County Council, providing support to the over 65s to stay living independently (SEIL), and the Housing and Economic Development Partnership (HEDP).

Key EHL functions and roles under the Future Model are shown in Appendix 1: Figure 3 below.

3.5 **Customer First Overview**

Customer First was created during Phase One of the Future Model and represents a universal approach to customer contact and case management. It currently consists of five teams:

- Customer Contact
- Customer Casework
- Neighbourhood First
- Specialist Advisors
- Service Improvement and Development

In addition to operating the contact centre for face to face and telephone enquiries across a wide range of functions, both Phase One and Phase Two, Customer First delivers the services that were in scope of Phase One: planning, environmental health, licensing, waste and recycling, parks and open spaces and economic development.

Phase Two will see Customer First expand significantly to incorporate services such as revenues, benefits and some housing functions, as well as bringing together work around debt recovery and processing changes to customer circumstances to ensure a more joined up approach. A summary of the proposed changes follows in paragraphs 3.6 to 3.10.

3.6 **Customer Contact**

Phase Two will see this team more than double in size and will include the insourcing of revenues and benefits call handling, a function that has been outsourced at EBC for many years, and attracts poor customer feedback currently.

To reflect the growth of the team, a number of team leader roles have been proposed.

See Appendix 1: Figure 4 below for details.

3.7 **Customer Casework**

The most significant change to the Phase One Customer First structure happens in Customer Casework, which more than trebles in size, largely due to revenues and benefits processing being brought in, and splits into two teams: Case Management and Account Management.

The Case Management team will deal largely with cases and applications that involve an ongoing customer journey. Some of the work will be mobile. It will consist of two to three sub-teams split across people, business and property. The focus of these teams will mirror that of the new Specialist Advisory team structure, see 3.9 below.

The Account Management team will deal largely with transaction and accounts changes and will largely be desk based. It will consist of two teams - finance, and data integrity/intelligence.

Both Case Management and Account Management teams will be flexible to allow and encourage multi-skilling across the sub teams.

The Case Management team will deal with routine processes and applications regarding:

- Planning
- Licensing
- Environmental health
- Corporate complaints
- Benefits applications
- HMO licensing
- Grants and loans
- Housing applications
- Homelessness assessments
- Tenancy issues, ASB
- Small works procuring

The Account Management team will deal with:

- Parking
- Council tax accounts, discounts
- NNDR
- Land charges
- Rent arrears
- General income invoicing and arrears
- Electoral roll
- Address maintenance
- Maintenance, data cleanse, mismatches

See Appendix 1: Figures 5 and 6 below for details.

3.8 **Neighbourhood First**

Phase Two will see the number of Neighbourhood Advisors increase and, as explained under paragraph 3.4, an enhanced Neighbourhood First partnership approach with EHL and Sussex Police to develop a shared ambition and vision for neighbourhood areas. At the point of publication the number of FTEs across the different teams is still being reviewed and is not included in this report.

It is envisaged that staff multi-skilling across the council and EHL teams will develop over time, building resilience and flexibility into the partnership. There will be a single Neighbourhood Operations team supporting whole partnership by providing operational support or other activity where rapid response, maintenance or vehicle support is needed.

See Appendix 1: Figure 7 below for details.

3.9 **Specialist Advisors**

Phase Two will see this team increase by half and continue to perform similar functions as established in Phase One, across a wider range of services. The role of Specialist Advisors in leading communities of practice across the other multi-skilled teams becomes even more important with the introduction of Phase Two.

To reflect the growth of the team, two team leader roles have been proposed, one with a focus on People services and the other on Place/Business services. This matches to the sub-teams within the Case Management team.

See Appendix 1: Figure 8 below for details.

3.10 **Customer First Functions Transferring to Strategy and Commissioning**

Phase Two sees Future Model principles applied across the majority of the remaining council functions. In Phase One, certain compromises were made to reflect the fact that the S&C roles were not yet defined. Now that we have a draft scope for, and roles to sit within, S&C, certain roles and functions that were put in Customer First in Phase One can now be moved.

Notable movements into S&C from Customer First are:

- Planning Policy and Economic Development moves from Specialist Advisors to Planning, Regeneration and Assets, due to the key role in forming policy and strategy, as well as playing a key role in regeneration initiatives.
- Service Improvement and Development is re-cast as part of the new Projects, Performance and Technology team.

4.0 **Resource Implications**

4.1 Financial:

- The current level of savings projected by the draft TOM is £1.03m. This excludes other areas of saving within the Phase Two business case, such as building and technology costs, and is in line with both the business case estimates and the MTFs. The budget 2015/16 proposals elsewhere on this agenda as well as the EHL budget savings show further savings of approximately £500,000.
- The projected savings will fluctuate as workshops continue and as a result of consultation feedback, but are not expected to fall below the levels required by the MTFs.

4.2 Staffing:

- As was the case with Phase One, the projected reduction in FTEs as a result of Phase Two will be approximately 20%, equivalent to 35-40 FTEs.
- The draft TOM will be subject to consultation until late January.
- A comprehensive consultation pack is being produced which includes an overview of the structures, the post details and the proposed recruitment process. A number of staff briefings are programmed to be delivered to launch the consultation and a full member briefing will also be held.

5.0 Conclusions

5.1 Publication of the draft TOM is a key milestone in the implementation of Phase Two. It is critical to publish the TOM in mid-December to provide adequate time for staff to provide feedback and to enable the final TOM to be produced in time to start recruitment.

The TOM will continue to change through consultation, and all FTE numbers and savings estimates outlined in this report are only estimates at the time of publication.

5.2 Principle features of the TOM outlined in this document are:

- Clearly designated S&C roles that form part of the strategic heart of the council, mapped to the new CMT structure.
- New delivery units for Sports and Seafront and Events.
- An enhanced housing and neighbourhood management role for EHL, with customer contact and routine casework shifting to Customer First.
- Casework splits into Case Management and Account Management
- A new Neighbourhood First partnership approach between the council and EHL, working closely with the police.
- Planning Policy, Economic Development and Service Improvement and Development moves from Customer First to S&C.

5.3 Members are asked to approve the principles of the draft TOM, whilst acknowledging that exact numbers of roles will continue to change, and delegate authority to the Chief Finance Officer to approve any changes arising from consultation, provided that they are in line with the principles laid out in this report and the requirements of the MTFS.

Henry Branson
Senior Head Of Infrastructure

Background Papers:

The Background Papers used in compiling this report were as follows:

- Sustainable Service Delivery Strategy Programme – Implementation of the Future Model Phase 2 (Cabinet Paper, 10 July 2013)
- Sustainable Service Delivery (SSDS) Update (Cabinet Paper, 5 February 2014)
- Sustainable Service Delivery (SSDS) Update (Cabinet Paper, 16 July 2014)
- Sustainable Service Delivery (SSDS) Update (Cabinet Paper, 22 October 2014)
- Medium Term Financial Strategy 2014-2019 (Cabinet Paper, 16 July 2014)

To inspect or obtain copies of background papers please refer to the contact officer listed above.

Appendix 1: Draft Target Operating Model Structures, Roles and Accountabilities

Figure 1: Strategy and Commissioning Roles

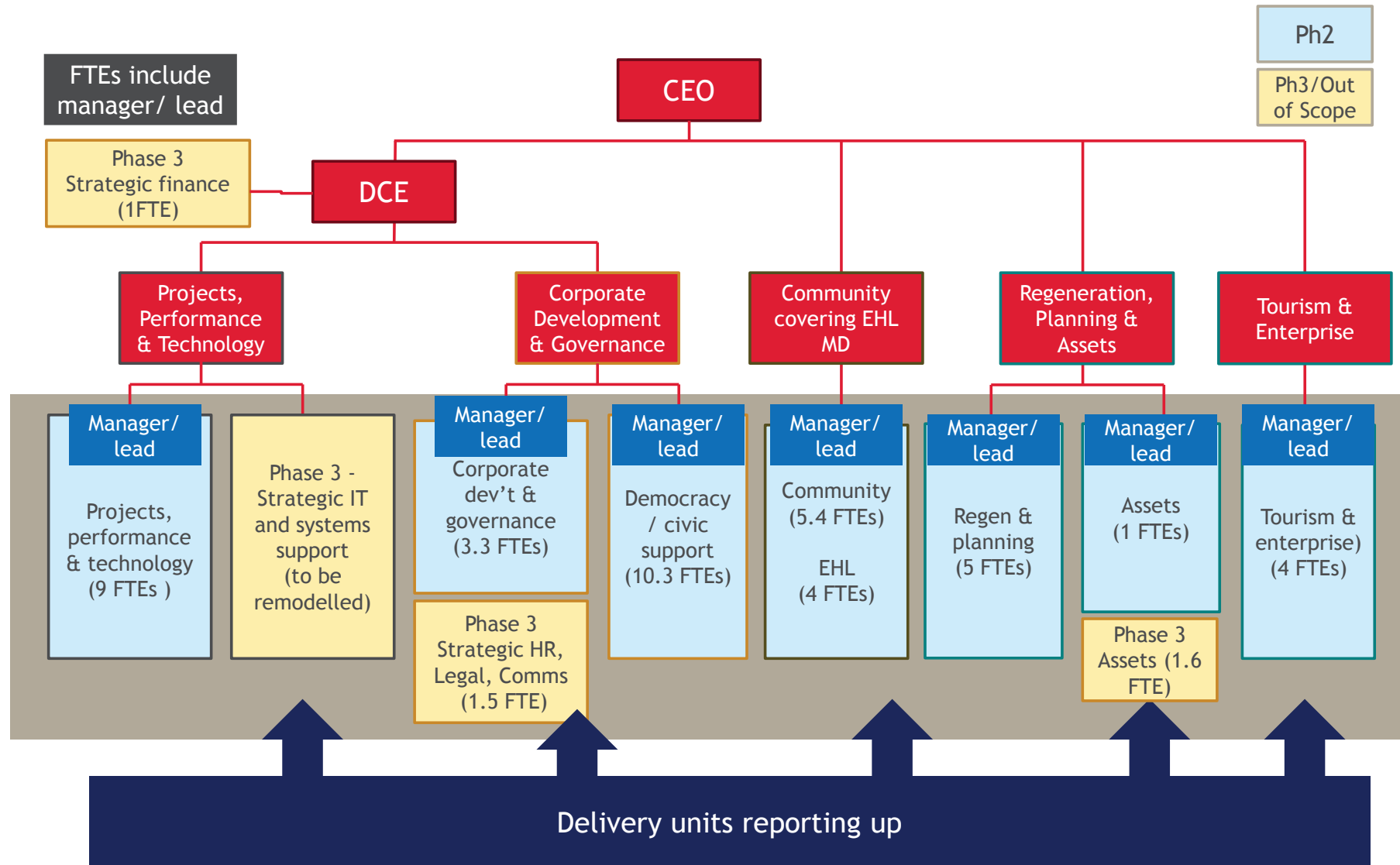


Figure 2: Relationships to Delivery Units

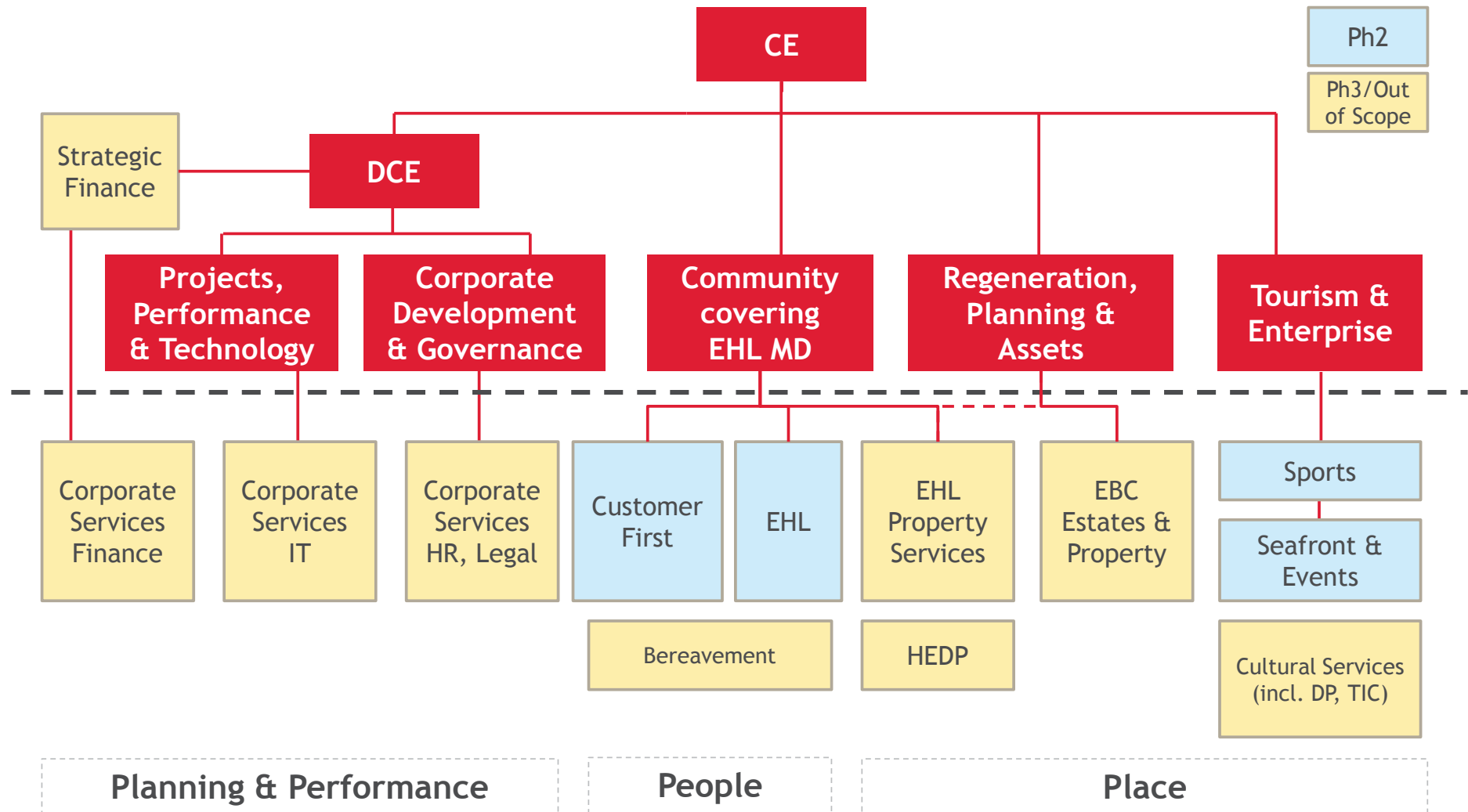


Figure 3: Eastbourne Homes Ltd and the Future Model

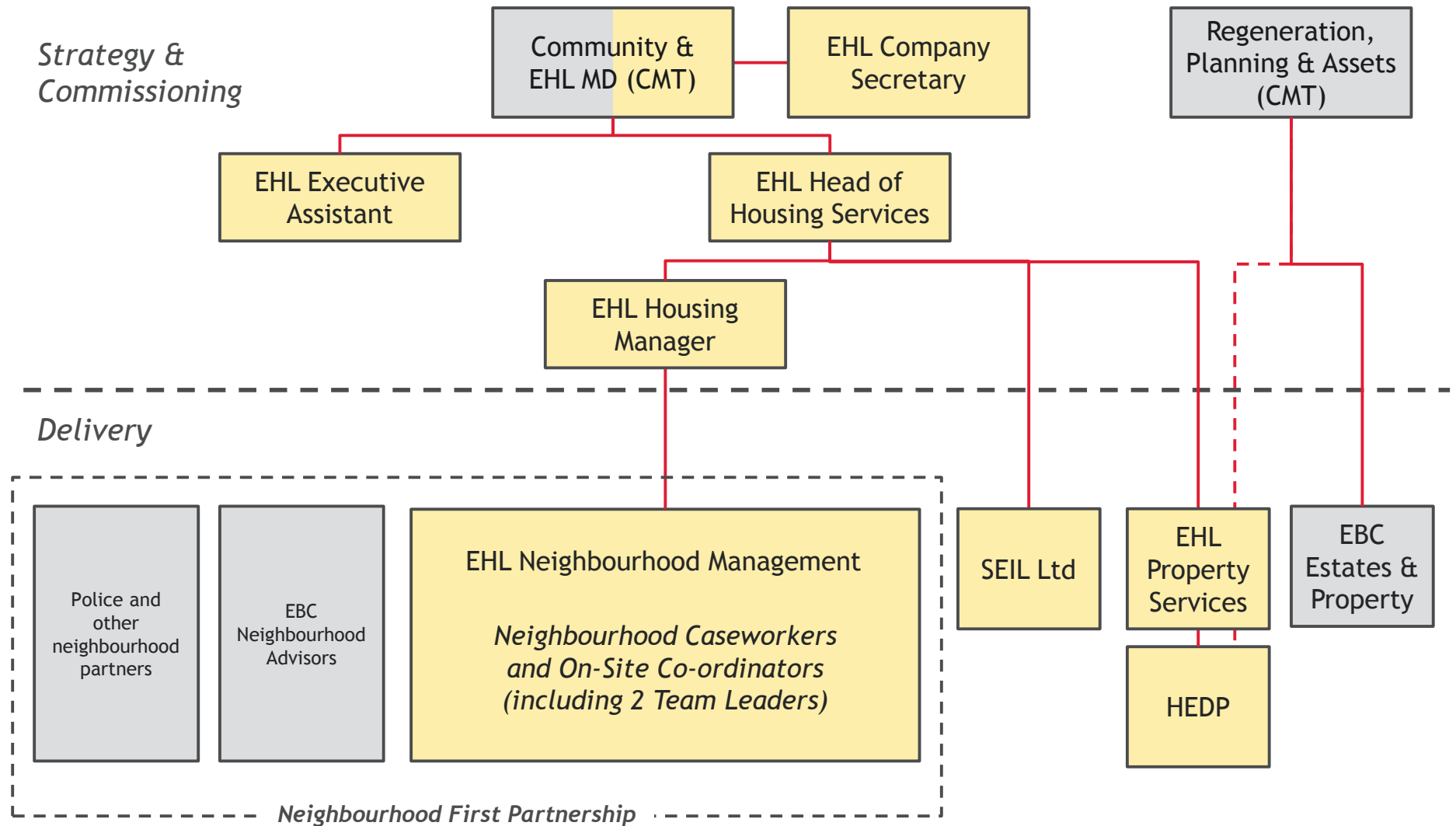


Figure 4: Customer First – Customer Contact

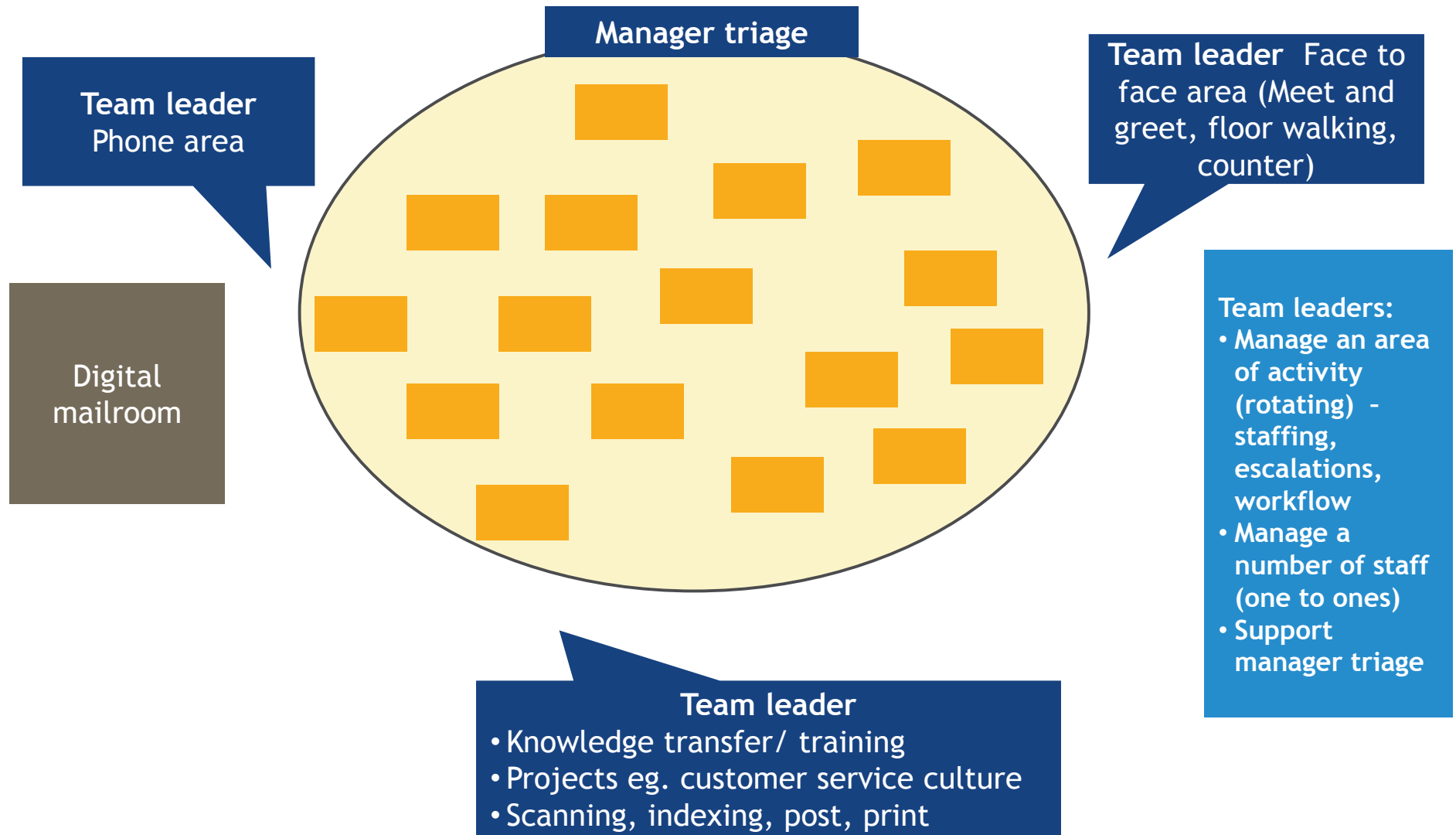


Figure 5: Customer First – Case Management

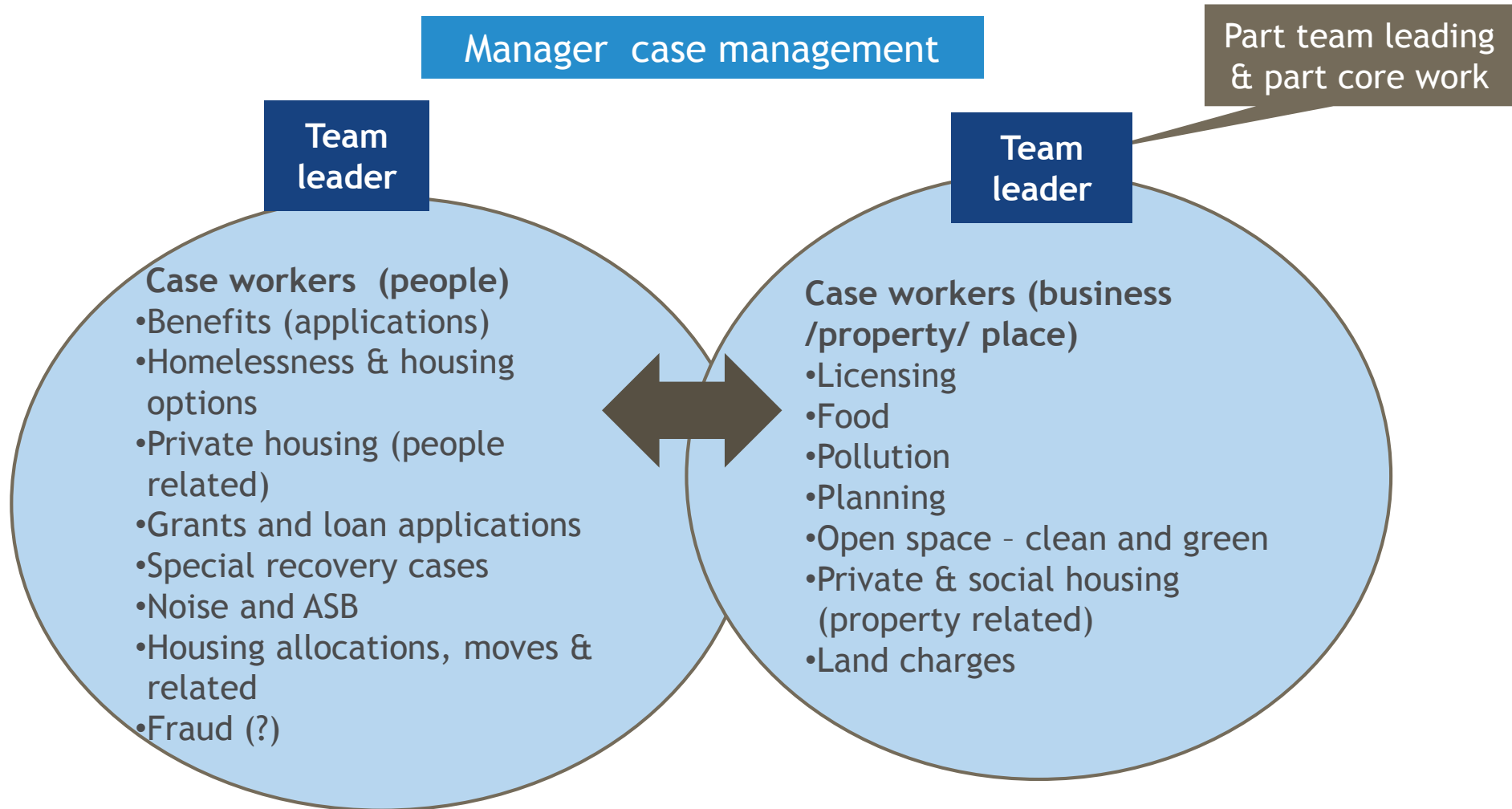


Figure 6: Customer First – Account Management

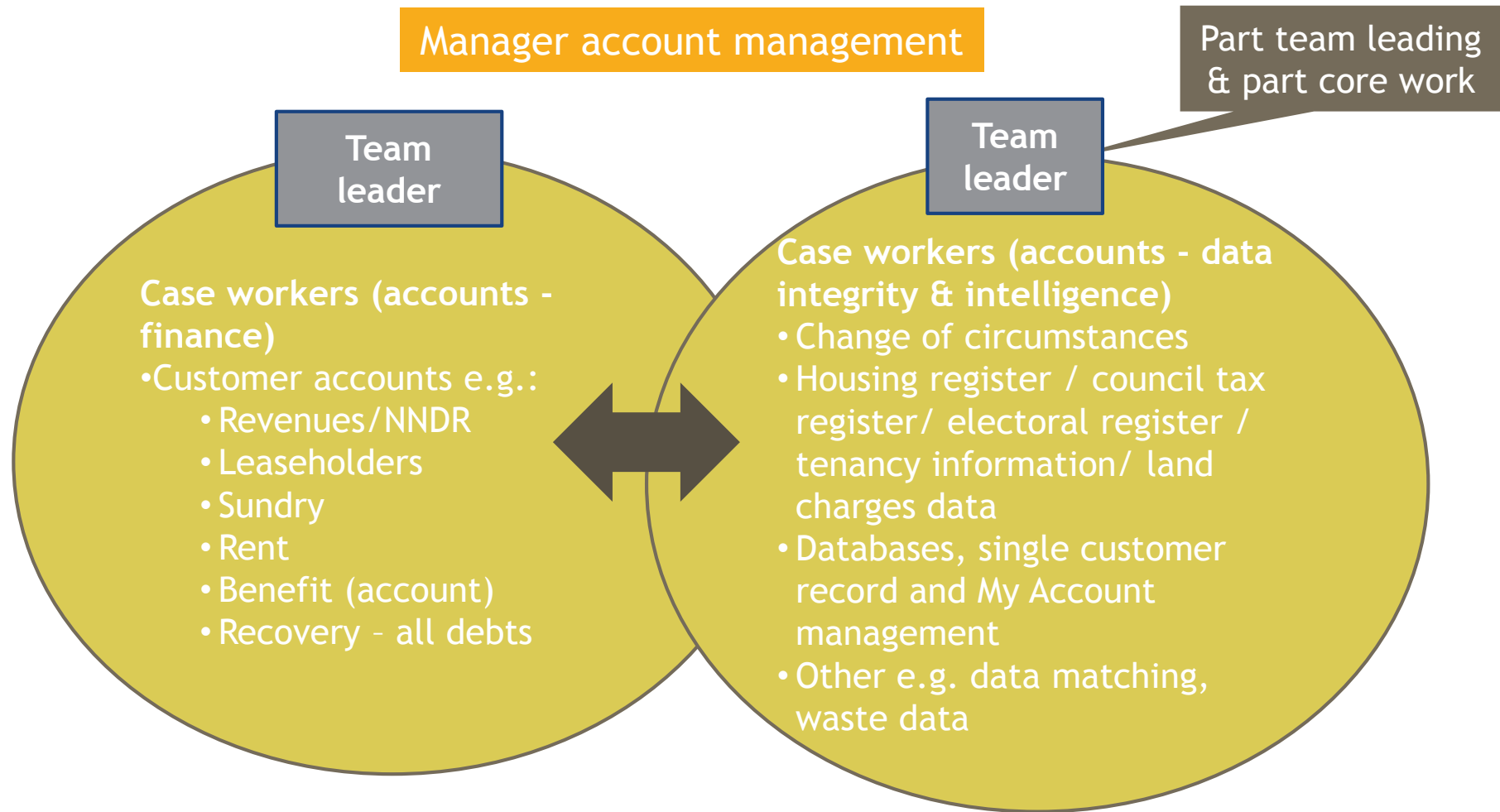


Figure 7: Customer First – Neighbourhood First

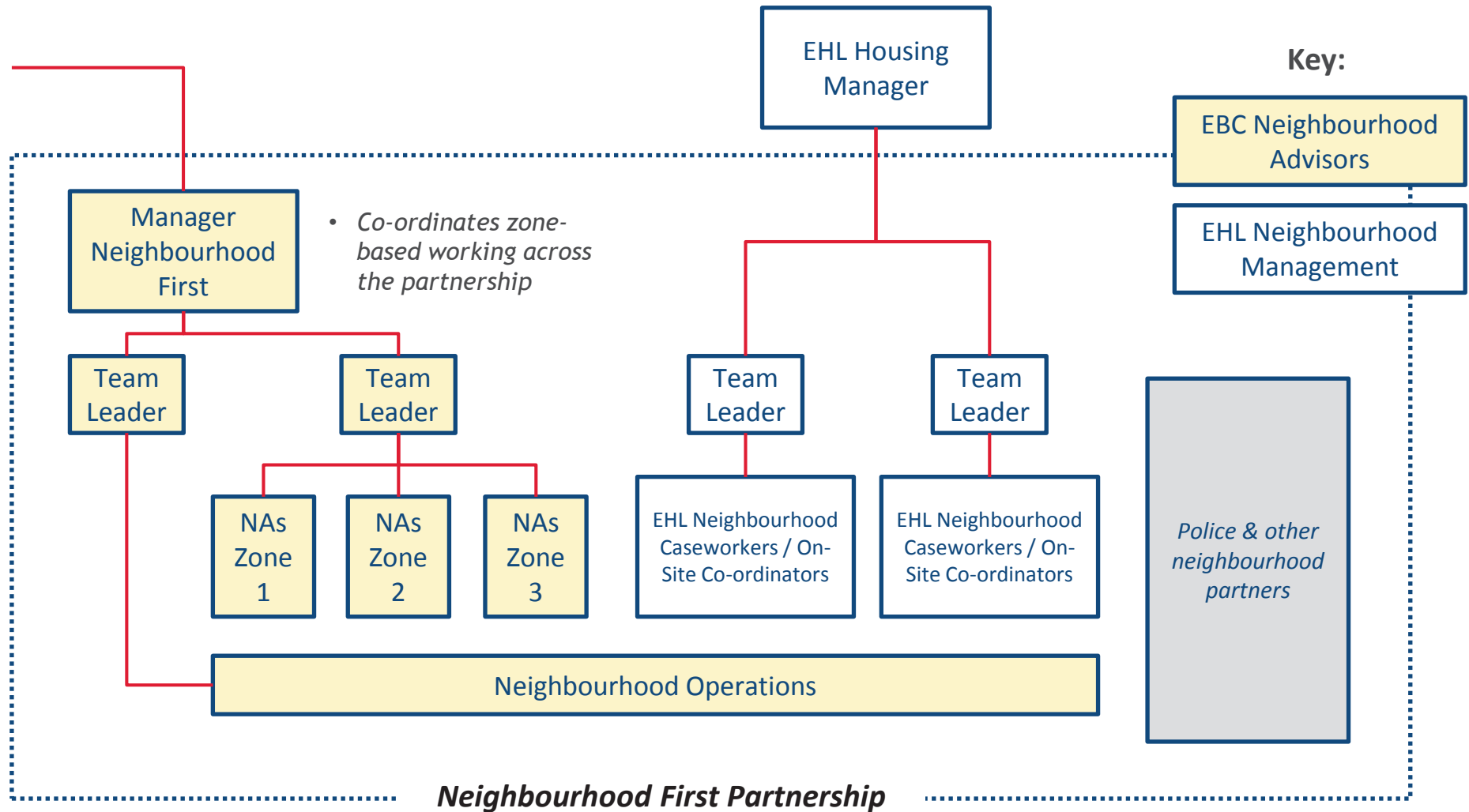
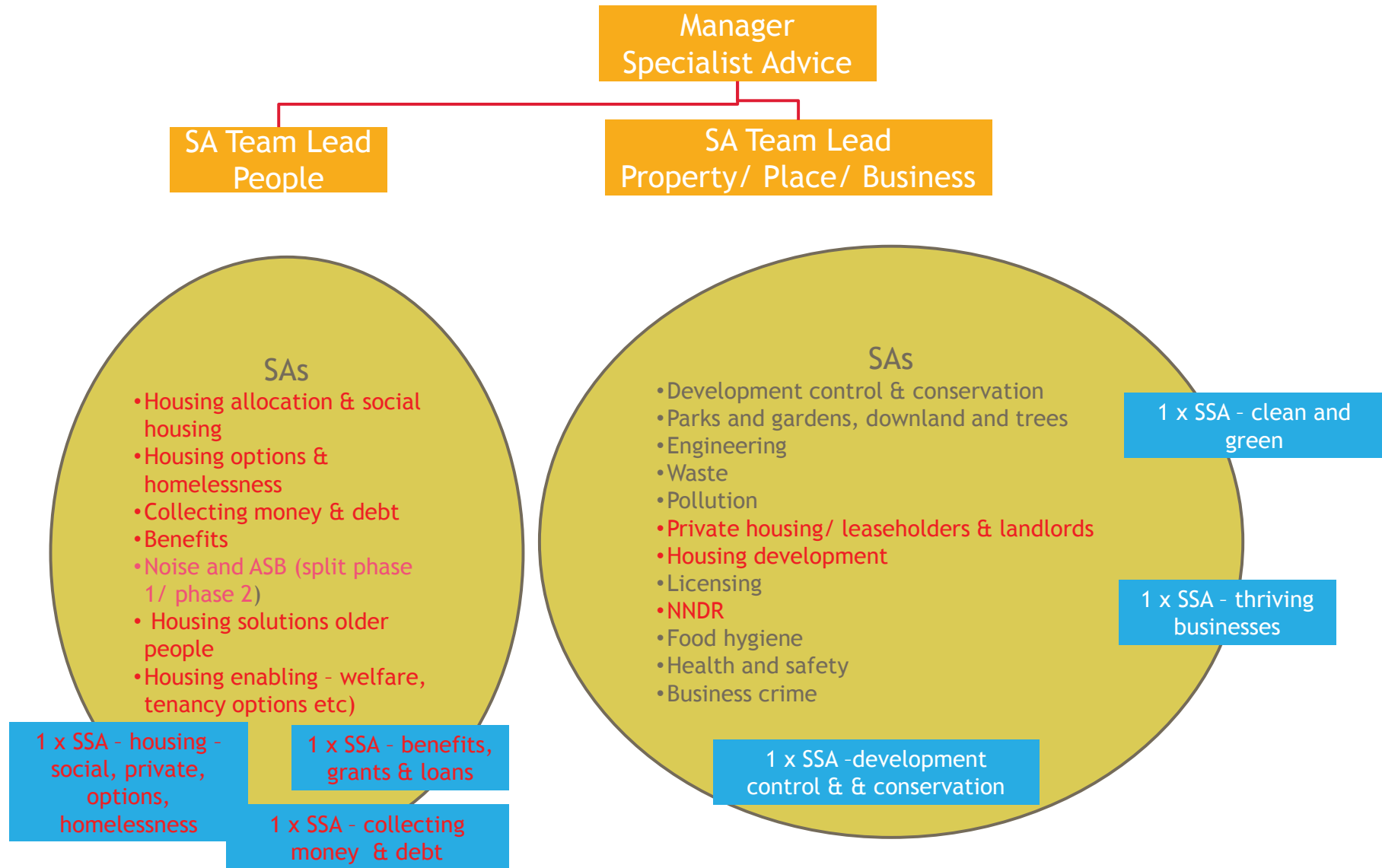


Figure 8: Customer First – Specialist Advisors



Body:	Cabinet
Date:	10th December 2014
Subject:	Internal Drainage Boards
Report Of:	Henry Branson, Senior Head of Infrastructure
Ward(s)	All
Purpose	To consider the options appraisal regarding a new Internal Drainage Board (IDB) for Pevensey Levels, following the proposed Environment Agency dissolution of existing East Sussex IDD.
Decision Type:	Key decision
Recommendation:	That Cabinet ; a) approves Option 3: formation of a new IDB to include the Pevensey Levels, and authorises officers to commence planning work with key partners. b) Delegated authority to be given to the Senior Head of Infrastructure in consultation with the Leader of the Council to take all necessary steps to contribute to the setting up of a new Board.
Contact:	Sue Oliver, Manager, Specialist Advisory Team Telephone 01323 415360 or internally on extension 5360. E-mail address sue.oliver@eastbourne.gov.uk

1.0 Introduction

1.1 Historically, the Environment Agency (EA) has acted as the Internal Drainage Board (IDB) for a number of Internal Drainage Districts (IDDs) in the South East. In 2011, the Chief Executive of the EA confirmed their intention to dissolve internally administered IDD's due to the view that arrangements for drainage districts should have a greater degree of local accountability.

1.2 There are three EA-administered IDD's in East Sussex: Pevensey Levels IDD, Ouse IDD and Cuckmere IDD. Part of Eastbourne sits within the Pevensey Levels IDD. There are 15,486 residential properties within Pevensey Levels IDD, and under current IDD management the majority are at a 1:200 or less risk of flooding (from the main river). 700 of these properties in the Langney area are at significant risk of surface water flooding.

There are 533 businesses within Pevensey Levels IDD, the majority are at 1:200 or less risk of flooding (from main river) under the current IDD. Whilst IDBs are not responsible for main rivers (the EA retains management of these), IDBs pay annual

precepts to the EA as a contribution to work on main rivers from which the IDD(s) benefits. For example, in the 2013/14 fiscal year, the East Sussex IDB paid the EA £109,370 for maintenance of main rivers.

- 1.3 The EA have asked the East Sussex Local Authorities about their views to dissolve the IDBs and the options for the future management of these drainage areas. The options under consideration are:

Option	Description	Additional Detail
Option 1	No Local Authority consensus as to what drainage arrangement should be put in place	Likely that Defra imposes IDB for Pevensey IDD
Option 2	No Objection to IDB Dissolution; No Replacement IDB	Drainage areas revert back to land-owner control; alternatively, recommend community-led water-level management.
Option 3	New IDB	New, independent Board to take over drainage area(s).

2.0 Internal Drainage Boards

- 2.1 An Internal Drainage Board is an independent local public authority that manages water levels within IDBs. Much of their work involves the maintenance of rivers, weirs, sluices, culverts, embankments, drainage channels, outfalls and pumping stations, facilitating drainage of new developments and advising on new planning applications. They have permissive powers with the IDBs to undertake such works as well as a statutory duty in regard to the environment and recreation when exercising their powers. They have a specific duty to further the conservation and enhancement of all designated environmental sites within their districts such as Sites of Special Scientific Interest (SSSIs) and RAMSAR sites (internationally protected wetland sites).
- 2.2 There are currently 120 IDBs in England covering 1.2 million hectares (9.7% of England's total land area). Defra is responsible for IDBs who work closely with the following: the EA, Lead Local Flood Authorities (LLFAs; ESCC is the LLFA for our area), and with LAs in regard to planning issues.

3.0 Options Appraisal

- 3.1 An East Sussex IDD Steering Group with members from local authorities, the EA and stakeholders, has been meeting regularly to gather information and discuss the issues regarding the EA's proposal to dissolve their responsibility of the East Sussex IDD. A small officer working group led by officers from Eastbourne Borough Council and Wealden District Council has been meeting to prepare an Options Appraisal. This has identified the known costs, opportunities, and risks for each of the 3 options in paragraph 1.3 above. A risk assessment was then undertaken based on the information available. The options appraisal is attached at Appendix 1.
- 3.2 The conclusions from the options appraisal are set out in the table below.

Options ranked in order of preference	Option
Preferred Option	Option 3, New IDB: New, independent Board to take over drainage area(s).
Second preference	Option 1, No Consensus: Defra imposes IDB (Pevensey).
Third preference	Option 2, No objection to dissolution, no replacement IDB: Drainage areas revert back to land-owner control; alternatively, recommend community-led water-level management.

The above preferences were arrived at on the basis of a number of risk factors, which fall under the following categories:

- Financial Risks
- Political Risks
- Flood Risks
- Environmental Risks

Option 3 is identified as having the lowest risk, which is to form a new IDB. It is worth noting that East Sussex County Council are supportive of this option.

4.0 Risks

4.1 Overall risks:

The Pevensey Levels IDD offers numerous benefits to the drainage district, including the following, which would be compromised in the event of no IDB:

- Biodiversity £11M p.a. – Protection of internationally and nationally important designated sites;
- Transport £3M p.a. – Flood prevention to 13km of mainline railway, 4 railway stations, and 19 km of road including the A259;
- Food production £1.5M p.a. – Flood protection to 236 ha of arable land and at least 1754 ha of grazing land;
- Recreation £1M p.a.- Approximate annual income of Cooden Beach golf club.

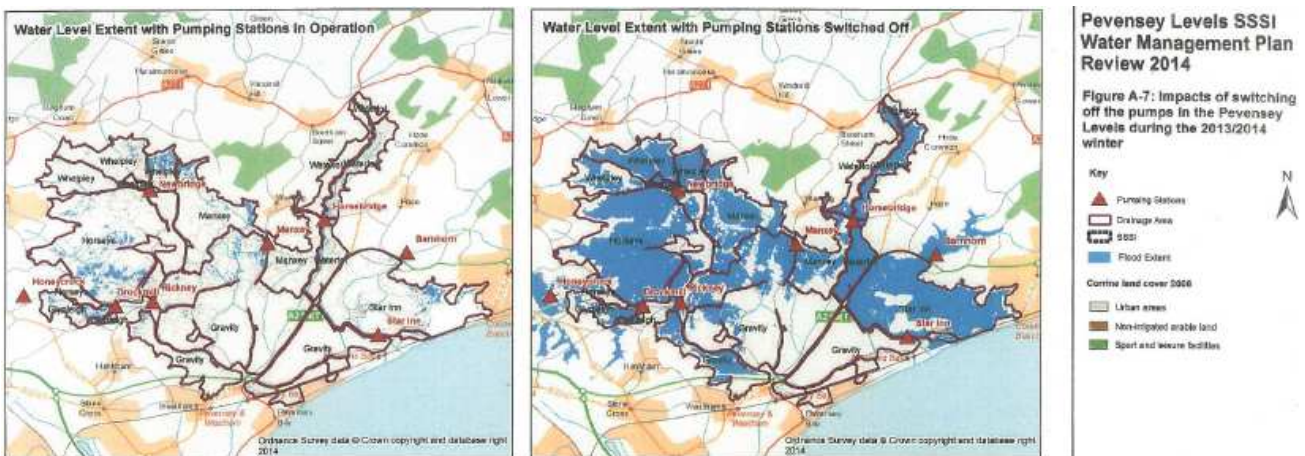
4.2 Risks with Direct Impact on Eastbourne:

- 9km of ordinary watercourses (OWC) in Eastbourne are currently maintained by the IDD, this maintenance would be lost, including that to East Langney Sewer.
- Loss of funding for maintenance of 23 kms of main river in Eastbourne (£110k p.a. for Pevensey Levels, ~£18k p.a. in Eastbourne).
 - Possible impact on flood risk mitigation-focused maintenance on the following Eastbourne main river watercourses: Langney Haven, Brickfield Ditch, Percival Road Sewer, Priory Road Sewer,

Crumbles Sewer, Highfield Sewer, Horsey Sewer, Lottbridge Sewer, Shinewater Sewer, Springfield Farm Ditch, Willingdon & West Langney Sewer, and Willingdon Sewer.

- Increased public anxiety and scrutiny in the event of flooding; and increased reputational risk if no IDB.
- Increased accountability if no IDB because EBC as local authority has permissive powers.
- Population in and around Pevensey Levels may be affected by increased occurrence of road closures, which may compromise reliable access to/from Eastbourne and have significant economic impacts:
 - The 1.6kms of A259 between the junction with the B2095 and Pevensey would increase in flood risk from 1:75 to 1:50.
 - Increased risk of flooding to 13 kms of mainline railway and 4 railway stations.

4.3 If there is no IDB and maintenance operations cease, then the land may become wetter, leading to a scenario as shown below (the figure on the left shows the extent of flooding with an IDB, the figure on the right without):



The critical assets of the Pevensey IDD are as follows:

Area (ha)			Watercourses (km)			Assets (pumps and sluices, qty); (watercourses, km)		
Urban	Rural	Total	Main River	OWC ¹	Total	Pump Stations	Sluices ²	Watercourses ³
653	6060	6713	141	305.5	446.55	8	202	105.5

4.4 Pevensey has a Water Level Management Plan (WLMP), which has recently undergone a thorough review by Natural England (NE) and the EA. The WLMP emphasizes the importance for managed water levels year-round, which is best achieved through an IDB, in order to protect farmers, land owners, businesses, and infrastructure as mentioned in the table above.

4.5 Two-thirds of the Levels are pumped, and, as shown above, there are ~450kms of ditches with 200 owner/occupiers. Last winter, it did not go under water because of

¹ Ordinary Watercourse, includes those currently maintained and those currently not maintained by existing IDB

² Includes other water control structures

³ Ordinary IDD Watercourses maintained by existing IDB; opportunity exists to expand maintenance to other watercourses in the IDD under a new IDB

the coordinated management that an IDB provides.

- 4.6 9 kms of the maintained Pevensey Levels IDD ordinary watercourses are in Eastbourne Borough, with 87 kms being in Wealden District. A further breakdown of the Pevensey Levels IDD profile follows below:

Table 1 Profile of the Pevensey Levels IDD

		Wealden District	Rother District	Hastings Borough	Eastbourne Borough	IDD total
Area	Urban	155ha	20ha	57ha	421ha	653ha
	Rural	4364ha	973ha	74ha	649ha	6060ha
	Total	4519ha	993ha	131ha	1070ha	6713ha
Watercourses	Main River	76kms	37kms	5kms	23kms	141kms
	IDD (OWC maintained by IDB)	87kms	9kms	0.5kms	9kms	105.5
	OWC (not maintained by IDD)	135kms	41kms	6kms	18kms	200kms
	Total	298kms	87kms	11.5kms	50kms	446.5kms

Due to the UK and international environmental designations of the Pevensey Levels, it is likely that Defra may enforce creation of a new replacement Board if the LAs are unable to reach a decision.

5.0 Timetable

- 5.1 The proposed EA timescale is as follows;

Action	Deadline
Local Authorities confirm decision in regard to preferred option	January 2015
Discussion with other Stakeholders and DEFRA about likely option	February – May 2015
Draft Order submit to DEFRA	End of June 2015
Dissolution of IDB by Secretary State for the Environment	March 2016
Alternative Arrangements in place	April 2016

If the local authorities agree to a new IDB, there is the possibility of pursuing a Public Sector Cooperative Agreement, whereby the EA would continue management until new arrangements are settled. This would provide flexibility in fleshing out the details of a replacement Board, and would ease the transition post-dissolution to ensure that Pevensey Levels remains under good management.

6.0 Resource implications

6.1 Financial

The expenses of an independent IDB are predominantly funded by the local beneficiaries of the water level management work they provide. The Land Drainage Act 1991 determines that the expenses of an IDB shall be met by:

- Drainage rates collected from agricultural land and buildings within the Internal Drainage District;
- Special Levies issued on District and Unitary Authorities within the Internal Drainage District;
- Contributions from the EA

The Special Levy is collected for the IDB by LAs through the District Councils' budget setting process. The LAs then pay this levy to the IDB. The 2014-15 LA contributions from the EA Annual Report for Pevensey

Levels IDD are as follows:

Pevensey IDD	Special Levy (£)
Eastbourne Borough Council	£193,186
Hastings Borough Council	£9,779
Rother District Council	£3,584
Wealden District Council	£38,435
Total	£244,984

The above special levy monies have historically been reimbursed by the Department of Communities and Local Government (DCLG) through the Revenue Support Grant (RSG). This funding is to be superseded by the Settlement Funding Assessment (SFA), which is guaranteed to continue until 2021. ESCC, EBC, and WDC are pursuing the future uncertainty of this government funding with the Secretary of State.

If there is no IDB, the Council would lose the ability to collect the special levy. In addition, DCLG would adjust the IDB Levy amount of the Relative Needs Formula which will mean a fall in RSG and baseline funding. Using the 2014-15 fiscal year as an example, had there been no IDB, the Council would have lost the ability to collect the special levy of £193,186, and also would have lost the match funding of the same amount. As the special levy is passed on to the IDB, the loss for the Council would have been £193,186 in 2014-15.

This issue has been specifically raised in letters to DCLG from Wealden District Council and from Eastbourne Borough Council, in early October. A reply is still awaited.

In order to reduce loss of monies to EBC, it is recommended to enter into the Pevensey Levels IDB at the same contribution level, or at such a level that represents the amount of funding received via the RSG as amended by the grant settlements, with the condition that contribution rates will be revaluated for 2021, when the RSG/SFA may change. Prior to that, a more proportional contribution level could be pursued.

As mentioned in section 1.2, another financial risk of not having an IDB would be reduced funding of main river maintenance from which the drainage district(s) benefits. In the case of Pevensey Levels, no IDB would result in an annual precept loss of approximately £110,000 paid from the IDB to the EA for maintenance of main rivers.

6.2 **Staffing** – the new IDB would be an independent public body, and as such, would be responsible for staff to provide administrative support, and direct arrangements for staff to undertake maintenance.

7.0 Other Implications, Environmental, Community Safety, Youth, Anti-poverty, Equality and Fairness analysis

7.1 **Environmental** – without an IDB to manage water levels, there is an increased risk of flooding and damage to biodiversity, transport, food production and recreational activities.

7.2 **Equality and fairness** – if a new IDB is created, there will be no changes to the service delivered to Eastbourne residents. Without an IDB, some residents may be affected disproportionately, and this would require further analysis.

8.0 Summary

8.1 The EA have asked the East Sussex Local Authorities about their views to dissolve the IDD's and the options for the future management of these drainage areas. This report explores the risks involved and summarises the options appraisal, with a recommendation that there should be a new IDB to include the Pevensey Levels.

Sue Oliver
Manager, Specialist Advisory Team

The Background Papers used in compiling this report were as follows:

Options Appraisal prepared by the East Sussex IDB Steering Committee Joint-Working Group October 2013.

To inspect or obtain copies of background papers please refer to the contact officer listed above.

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APPENDIX 1: Options Appraisal¹

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¹ Prepared by the East Sussex IDB Steering Committee Joint-Working Group.

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Introduction:

The Environment Agency has advised that they intend to dissolve their responsibility for managing the IDDAs within East Sussex. Pre-dissolution, a joint working group—the East Sussex Steering Group—has been set up to evaluate a number of options for the future management of drainage within the areas involved. The Local Authorities have met separately over the last few months to discuss the proposals and undertake an options appraisal, the conclusions of which are set out in this report.

Options

Option	Description	Additional Detail
Option 1	No Consensus	Defra imposes IDB (Pevensey)
Option 2	No Objection to IDB Dissolution; No Replacement IDB	Drainage areas revert back to land-owner control; alternatively, recommend community-led water-level management.
Option 3	New IDB	New, independent Board to take over drainage area(s).

Risks and opportunities of viable options

Option 1: No Consensus –NOT RECOMMENDED	
Description	In the event East Sussex LAs cannot arrive at a consensus as to whether or not to have a joint or regional IDB, it is likely that Defra will impose an IDB for the Pevensey IDD, and that the IDBs for Cuckmere and Ouse will effectively be lost, reverting to land-owner control ² .
Known LA Costs	<p>LA special levy annual contributions to Pevensey IDD to remain as the below, based on the 2014-15 forecast as per the EA Annual Report for Pevensey IDD:</p> <ul style="list-style-type: none"> • WDC: £38,435 • HDC: £9,779 • RDC: £3,584 • EBC: £193,186 <p>The above monies have been historically reimbursed from the Department of Communities and Local Government through their Revenue Support Grant. This funding is to be superseded by the Settlement Funding Assessment (SFA), which is guaranteed to continue until 2021. ESCC and WDC are pursuing the future uncertainty of this government funding with the Secretary of State</p>
Opportunities	<p>None identified. However, if a replacement IDB for Pevensey is dictated, there would be future opportunities with that IDB, including:</p> <ul style="list-style-type: none"> • Pevensey IDB would be primary contact for any related drainage issues, alleviating responsibility and time for participating authorities; • Pevensey IDB could provide specialist advice to LAs regarding SUDS approval and other drainage issues; • A new independent IDB for Pevensey is likely to reduce operating costs for that drainage district (relative to the situation at the moment).
Risks	<ul style="list-style-type: none"> • DCLG revenue support grant that offsets LA contributions not guaranteed beyond 2021 could well place an additional financial burden on some LAs. • If no IDB, LA may incur costs due to increased enforcement dealing with surface water drainage issues. • No IDB could result in loss of investment in local drainage area(s) that could adversely impact the economic viability of the area.³ • Potential that, if an IDB is set-up, special levy rates may be set that are unacceptable to individual LAs. • No guarantee that a new IDB would reimburse LAs of any/all incurred expenses in the setup of a new IDB. • Elected members may not have the time or resources to sit and make decisions on the board. • If no IDB, increased public anxiety and scrutiny of LAs in event of flooding; increased reputational risk to LAs if no Board.

² Pumps or assets within the Ouse and Cuckmere drainage districts would pass on to land owners or, possibly, control might be retained by the EA. At this stage it's difficult to be certain what would happen to the pumps in particular.

	<ul style="list-style-type: none"> • Composition of Board may not reflect LAs best interests • Population in and around an IDD may be disgruntled (e.g. due to levy increases, increased occurrence of road closures, etc.), which could impact voting preferences. • No IDB could result in uncoordinated water level management, increasing water levels and flood risk. • Increased flood risk to roads (most notably, the A259) and some property due to lack of a coordinated drainage management plan.⁴ • Loss of Cuckmere IDD and Ouse IDD (i.e. if Defra imposes IDB, it would be for Pevensey only and the Ouse and Cuckmere wouldn't warrant own IDB/IDD) could result in greater flood risk for that drainage district. • Potential environmental health issues. For example, those resulting from increased threat of cross-contamination (e.g. foul drainage surcharging or compromised performance); Impact upon sewage works operating near an IDD. • Potential for increased/unmanaged invasive weed problems, which may have an impact on systems outside of drainage district boundaries.
<p>Evaluation</p>	<p>This option should be avoided due to:</p> <ul style="list-style-type: none"> • It may not prevent a replacement IDB, as a Pevensey IDB would likely be forced on LAs who are affected by the IDD ; • The Pevensey IDB would be stand-alone and would lose financial resources for Cuckmere and Ouse IDBs; • Lack of coordinated water level management for Cuckmere and Ouse; • The inability for the LAs to come to a unified decision may reflect poorly on LAs involved within the communities in and around the IDBs.

³ LAs would lose the ability to collect special levy (detailed under “known LA costs”), as well as EA contributions into IDBs/IDBs that are termed “higher land water contributions”. In 2013/14, for example, no IDB would have resulted in a loss of up to £53,000 total contribution (£31,000 for Pevensey IDD, £20,000 for Ouse IDD, and £2,000 for Cuckmere IDD). If a Pevensey IDB were imposed, the loss would be around £22,000 p.a. Source: Internal Drainage Boards in England, Annual Reports for the Year Ended 31 March 2014, Defra.

⁴ Pevensey Levels Water Level Management Plan review 2014: Technical assessment for the future management of the Pevensey Levels Site of Special Scientific Interest, Environment Agency and Natural England, DRAFT 14/10/2014.

Option 2: No Replacement IDB –NOT RECOMMENDED	
Description	If the LAs jointly agree not to replace the East Sussex IDB, then the three drainage districts will either revert back to land-owner control or, alternatively, LAs can recommend community-led water level management. LAs have permissive powers with regards to drainage which could in all likelihood require exercising in either scenario. Alternatively, LAs (LDC in particular) are exploring the possibility of retaining the Revenue Support Grant monies for management of drainage district(s) internally.
Known LA Costs	The LA costs under this option are unknown. Whilst LAs will be relieved of obligatory annual special levy contributions to an IDB, economic repercussions in an uncoordinated and potentially unreliable water-level management approach could be adopted.
Opportunities	None identified.
Risks	<ul style="list-style-type: none"> • If no IDB, LA may incur costs due to increased enforcement dealing with surface water drainage issues. • No IDB could result in loss of investment in local drainage area(s) could adversely impact the economic viability of the area.⁵ • If no IDB, increased public anxiety and scrutiny of LAs in event of flooding; increased reputational risk to LAs if no Board. • Increased accountability for LA as have permissive powers (LAs are not currently responsible for IDD). • Population in and around an IDD may be disgruntled (e.g. due to levy increases, increased occurrence of road closures, etc.), which could impact voting preferences. • No IDB could result in uncoordinated water level management, increasing water levels and flood risk. • Increased flood risk to roads (most notably, the A259) and some property due to lack of a coordinated drainage management plan.⁶ • Loss of Cuckmere IDD, Pevensey IDD and Ouse IDD could result in greater flood risk for these drainage districts. • Potential environmental health issues. For example, those resulting from increased threat of cross-contamination (e.g. foul drainage surcharging or compromised performance); Impact upon sewage works and other infrastructure operating near an IDD. • Potential for increased/unmanaged invasive weed problems, which may have an impact on systems outside of drainage district boundaries.

⁵ LAs would lose the ability to collect special levy (detailed under “known LA costs” in Option 1), as well as EA contributions into IDBs/IDDs that are termed “higher land water contributions”. In 2013/14, for example, no IDB would have resulted in a loss of up to £53,000 total contribution (£31,000 for Pevensey IDD, £20,000 for Ouse IDD, and £2,000 for Cuckmere IDD). Source: Internal Drainage Boards in England, Annual Reports for the Year Ended 31 March 2014, Defra.

⁶ Pevensey Levels Water Level Management Plan review 2014: Technical assessment for the future management of the Pevensey Levels Site of Special Scientific Interest, Environment Agency and Natural England, DRAFT 14/10/2014.

Evaluation	<p>This option should be avoided due to:</p> <ul style="list-style-type: none">• Lack of coordinated water level management for any of the three E. Sussex drainage districts (most notably Pevensey) could result in excessive road closures and have numerous economic and development consequences in and around the drainage areas;• Additional burden for the LAs with regards to some aspects of drainage and land owner grievances (which would otherwise be handled by an IDB).
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Option 3: Replacement IDB –PREFERRED OPTION	
Description	A new IDB (an independent risk management authority with permissive powers) would be created as part of the dissolution process of the existing EA IDB. The EA has agreed to continue the operational management throughout a reasonable transition period, under a Public Sector Cooperation Agreement, giving the participating LAs time and flexibility. IDBs, as independent statutory authorities, absorb nearly all of the risk affiliated with the drainage district(s) under its management, thereby reducing risk to LAs whilst presenting numerous opportunities and resources for both the LAs and the region.
Known LA Costs	<p>LA special levy annual contributions to replacement IDB(s) to remain as the below, based on the 2014-15 forecast per the EA Annual Report for East Sussex IDD, until the new IDB(s) adjusts contributions:</p> <p><u>Pevensey IDD</u></p> <ul style="list-style-type: none"> • WDC: £38,435 • HDC: £9,779 • RDC: £3,584 • EBC: £193,186 <p><u>Ouse IDD</u></p> <ul style="list-style-type: none"> • MSDC: £11,640 • WDC: £8,834 • LDC: £123,530 <p><u>Cuckmere IDD</u></p> <ul style="list-style-type: none"> • WDC: £3,814 <p>The above monies have historically been reimbursed by the Department of Communities and Local Government through their Revenue Support Grant. This funding is to be superseded by the Settlement Funding Assessment (SFA), which is guaranteed to continue until 2021. ESCC and WDC are pursuing the future uncertainty of this government funding with the SOS.</p>
Opportunities	<ul style="list-style-type: none"> • Reduced operating costs relative to situation today with an EA-managed IDB; • Opportunity to share administrative, technical, and operational resources between IDBs in time of need. This would be the case where one IDB manages two or more IDBs; • Improved biodiversity; • Continued maintenance and possible improvement of invasive weed problem; • Reduced accountability for LAs with an IDB, because the IDB would be accountable; • Decreased potential for public anxiety and scrutiny of LAs in event of flooding; decreased reputational risk to LAs and benefit of LAs being able to direct land owners to IDB with complaints, questions, etc.; • In the unrelated but likely event that SUDS (Sustainable Urban Drainage Systems) planning approval is transferred to LAs. An IDB would provide technical expertise and resources for LAs;

	<p>this would be very advantageous for LAs in providing good technical guidance during the planning process.</p>
Risks	<ul style="list-style-type: none"> • DCLG revenue support grant that offsets LA contributions not guaranteed beyond 2021 could well place an additional financial burden on some LAs. • Potential that, if an IDB is set-up, special levy rates may be set at an unacceptable level for individual LAs. • No guarantee that a new IDB would reimburse LAs of any/all incurred expenses in the setup of a new IDB. • Elected members may not have the time or resources to sit and make decisions on the board. • Composition of Board may not reflect LAs best interests
Evaluation	<p>This is the preferred option, as the IDB—an independent statutory authority—will manage the drainage district(s) in the most effective, efficient way possible, removing any potential responsibilities from the LAs. This option of imposing replacement IDB(s) preserves the most flexibility for management of all three drainage districts most notably to benefit being, the SSSI and Ramsar designated Pevensey Levels. An IDB exists to manage water levels in a way that satisfies all regulations, whilst reducing flood risk and the risk of resulting infrastructure impacts (e.g. road closures, wastewater treatment plant functionality).</p> <p>The order of magnitude of the net benefits of the work of the Pevensey Levels IDD is approximately £16million per annum, broken down as follows⁷:</p> <ul style="list-style-type: none"> • Biodiversity £11M p.a. – Protection of internationally and nationally important designated sites; • Transport £3M p.a. – Flood prevention to 13km of mainline railway, 4 railway stations, and 19 km of road including the A259; • Food production £1.5M p.a. – Flood protection to 236 ha or arable land and at least 1754 ha of grazing land; • Recreation £1M p.a.- Approximate annual income of Cooden Beach golf club.

⁷ Pevensey Levels Water Level Management Plan review 2014: Technical assessment for the future management of the Pevensey Levels Site of Special Scientific Interest. Environment Agency and Natural England. DRAFT 14/10.2014. Refer to Appendix B for additional details.

Risk Assessment

Risk Score

- 0 = Negligible Impact
- 1 = Low Impact, Low Likelihood
- 2 = Low Impact, High Likelihood
- 3 = High Impact, Low Likelihood
- 4 = High Impact, High Likelihood

Option No.

- 1 = No Consensus
- 2 = No Replacement IDB
- 3 = New IDB

		RISKS		
		1	2	3
Financial Risks	DCLG revenue support grant not guaranteed beyond 2021 to offset LA contributions, placing financial burden on LA.	3	0	3
	If no IDB, LA may incur costs due to increased enforcement with regards to surface water drainage issues.	1	2	0
	No IDB could result in loss of investment in local drainage area(s) could adversely impact the economic viability of the area ⁸ .	3	4	0
	Potential that, if an IDB is set-up, special levy rates may be set that are unacceptable to individual LAs.	2	0	2
	No guarantee that a new IDB would reimburse LAs of any/all incurred expenses in the setup of a new IDB.	1	0	1
Political Risks	Elected members may not have the time or resources to sit and make decisions on the board.	2	0	2
	If no IDB, increased public anxiety and scrutiny of LAs in event of flooding; increased reputational risk to LAs if no Board.	2	4	0
	Composition of Board may not reflect LAs best interests.	1	0	1
	Increased accountability for LA (LAs are not currently responsible for IDD).	2	4	0
	Population in and around an IDD may be disgruntled (e.g. due to levy increases, increased occurrence of road closures, etc.), which could impact voting preferences.	1	2	0
Flood Risks	No IDB could result in uncoordinated water level management.	2	4	0
	Increased water levels and flood risk to infrastructure including roads (most notably, the A259) and some property due to lack of a coordinated drainage management plan.	2	4	0
	Loss of Cuckmere IDD (i.e. if Defra imposes IDB, it would be for Pevensy only and Cuckmere may not warrant own IDB/IDD) could result in greater flood risk for that drainage district.	2	2	0
	Loss of Ouse IDD (i.e. if Defra imposes IDB, it would be for Pevensy only and Ouse may not warrant own IDB/IDD) could result in greater flood risk for that drainage district.	4	4	0
Environmental Risks	Potential environmental health issues. For example, those resulting from increased threat of cross-contamination (e.g. foul drainage surcharging or compromised performance); Impact upon sewage works operating near an IDD.	3	3	0
	Potential for increased/unmanaged invasive weed problems, which may have an impact on systems outside of drainage district boundaries.	1	3	0
Preferred Option Lowest Risk is Option 3, New IDB		30	32	9

⁸ For example, if Ouse is not part of an IDB, then the EA higher level water contribution for that drainage district would be lost. In 2013/14, this would have been £20,000 per the Internal Drainage Boards Annual Report, 31 March 2014, Defra.

IDB configuration: Opportunities

The strongly preferred option is Option 3: New IDB. However, as there are three drainage districts in East Sussex, there are numerous permutations that can exist under this option. The most pragmatic of these combinations follow:

1. One regional IDB managing all three IDD (Pevensey, Cuckmere, and Ouse);
2. Three IDBs, one for each IDD;
3. Two IDBs, one for Pevensey and Cuckmere IDDs, and one for Ouse;
4. One IDB for Pevensey and Cuckmere IDDs, with the Ouse reverting to local control.

Certainly, when IDBs are rolled under the singular management of one IDB, the following opportunities present themselves:

- Decreased set-up costs;
- Decreased administrative costs and reduced operating costs to situation today with an EA-managed IDB;
- Increased resource sharing; opportunity to share administrative, technical, and operational resources between IDDs in time of need.

It is therefore recommended to have only one regional IDB, or to consolidate two IDBs under the management of one IDB (e.g. Pevensey and Cuckmere). However, simply having an IDB is preferable to not having one.

Other Risks

There are other risks that could potentially impact on LAs or impact on other individuals and agencies that the LA is involved with. The risk to LAs is very negligible but they have been listed below for information:

- Land-owners at risk of higher drainage rates;
- If no IDB, lack of capital maintenance budget could result in expense to asset owner (likely to be either EA or, possibly, land owner) in event of unexpected asset failure (i.e. pump);
- Additional need for Natural England Enforcement under the Habitat and Species Regulations, and Wildlife and Countryside Act of 1981, this could be extremely resource intensive for this agency and incur them with increased costs if this aspect is not managed adequately;
- East Sussex County Council may have to use permissive powers in order to resolve issues under the Land Drainage Act;
- Risk enforcement against land owners.

A new IDB would absorb all risks associated with the operational management of the IDD's under its management (removing said risks from participating LAs). An example of these risks follows:

- There are no capital reserves available to transfer to any new IDB which is set up;
- Transfer of telemetry from existing proprietary-EA system to new IDB could be a costly one-time expense;
- Lack of compatibility between existing telemetry system and web interface for new IDB, resulting in levels and alerts data not being readily available, which could result in more person hours onsite;
- Existing IDB lack of follow-through on current maintenance plan (e.g. replacement of two motors scheduled for 2014/15 at Newbridge pumping station⁹);

How IDBs Are Funded

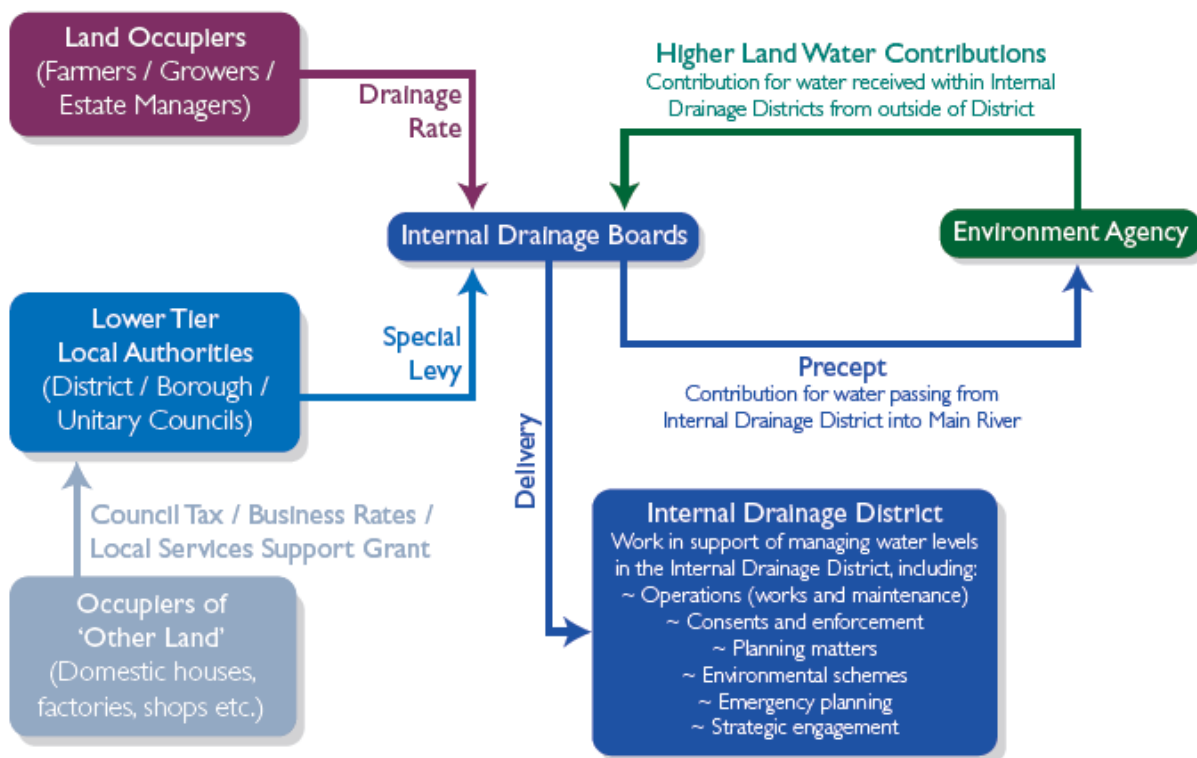
As explained by the Association for Drainage Authorities (ADA), the way in which IDBs are funded follow¹⁰:

The expenses of an IDB are predominantly funded by the local beneficiaries of the water level management work they provide. Each IDB sets a budget for its planned work in the forthcoming year and any investments it needs to make for future projects. Section 36 of the Land Drainage Act 1991 determines that these expenses of an IDB shall be met by:

- Drainage rates collected from agricultural land and buildings within the Internal Drainage District;
- Special Levies issued on District and Unitary Authorities within the Internal Drainage District;
- Contributions from the Environment Agency (see Higher Land Water Contributions (HLWC) from EA to IDB).

⁹ For more details on critical assets, refer to Critical Assets Overview section of this document.

¹⁰ Excerpt from ADA Introduction to IDBs. Additional details can be found in Appendix A.



Flow chart of IDB finance input and outputs
(Source: Ian Moodie, ADA)

Capital Funds

An on going discussion revolves around the absence of capital funds for a new IDB, which is a risk especially in the event of failure of a critical asset (i.e. pump) early in the new IDB's inception. A suggestions that could alleviate this risk, and which warrants further discussion, is to seek a soft loan from the EA that would be available to a new IDB in the event a major asset failure.

Additionally, according to Defra, issues pertaining to capital funds could be addressed **as follows** (with an IDB):

Capital funding – for replacement of assets such as pumps. All Risk management authorities, including IDBs and local authorities can apply for Flood Defence Grant in aid (FDGiA) to fund replacement of pumping stations. There is an element of FDGiA specifically to support SSSI actions and remedies, prioritised by Outcome measure 4... International designations [for which Pevensy Levels qualifies] get a higher priority for this funding.¹¹

¹¹ Defra feedback June 2014

Critical Assets Overview¹²

IDD	Area (ha)			Watercourses (km)			Assets (pumps and sluices, qty); (km)			
	Urban	Rural	Total	Main River	OWC ¹³	Total	Pump Stations	Sluices ¹⁴	Watercourses ¹⁵	Raised Embankments
Pevensey	653	6060	6713	141	305.5	446.5	8	202	105.5	0
Ouse	1511	4004	5516	183	237	420	3	20	50	0.225
Cuckmere	41	706	747	48	38	86	0	17	7	0

IDBs are stand-alone statutory authorities, who would be in charge of critical assets. This arguably removes potential liabilities from the LAs and/or landowners.

Pumping Stations

The pumping stations are the most expensive aspect of the critical assets. There has been some consideration as to whether it would be acceptable for the EA to continue to service and maintain these. It is however unlikely to be a practical option for the following reasons:

- EA unwillingness and/or inability to retain operational control of pumping stations,
- Inability for IDB to implement the Water Level Management Plan (WLMP) or to adequately operate IDD's without ownership and/or control of all critical assets.

Representatives from this E. Sussex joint working sub-group have conducted site visits to the eight pumping stations in Pevensey IDD over the Summer 2014, accompanied by the EA Operations Delivery Team Leader for Pevensey IDD. Whilst they are significant assets, all observed stations are in reasonable working order and have been adequately maintained. However, it is recommended that a new IDB insist on the continuance of the currently-scheduled capital maintenance plan prior to inheritance of assets, including the replacement of two pump motors at Newbridge pumping station in Pevensey Levels IDD, which had been previously scheduled for 2014/15.

Pumping Station Estimated Maintenance Cost¹⁶ Summary:

	10-yr Avg (£/yr)	Total 10-yr (£)	50-yr Avg (£/yr)	Total 50-yr (£)
Ouse	31,101	311,013	30,187	1,509,367
Pevensey	163,511	1,635,109	146,151	7,307,545

Note that the above represents average annual costs, not peak annual costs.

¹² Source for section comes from EA-document "TAW for East Sussex IDD Steering Group", November 2013.

¹³ Ordinary Watercourse, includes those currently maintained and those currently not maintained by existing IDB

¹⁴ Includes other water control structures

¹⁵ Ordinary IDD Watercourses maintained by existing IDB; opportunity exists to expand maintenance to other watercourses in the IDD under a new IDB

¹⁶ Includes regular maintenance, infrequent maintenance, and theoretical capital maintenance costs.

Joint Local Authority Legal Advice

In August 2014 legal clarification, in the form of a Counsel's opinion, was sought around a number of aspects of this issue¹³.

The Conservation Habitat and Species Regulations 2010 require an appropriate authority to exercise their functions which are relevant to nature conservation so as to secure compliance with Habitat Directives. This includes any functions undertaken under the Water Resources Act 1991, the Land Drainage Act 1991 and the Natural Environment and Rural Communities Act 2006. The Habitats Directive refers to ensuring restoration or maintenance of natural habitats and species of community interest at a favourable conservation status. It also refers to avoiding deterioration of natural habitats.

The review being undertaken by Natural England of the Pevensey Level Water Management Plan is likely to have relevance in defining a 'favourable conservation status' in the Pevensey Levels area and influence the decision on what option is preferred by DEFRA. Natural England does have the enforcement responsibility to conserve biodiversity and therefore take a lead in regard to this aspect.

The only responsibility that Local Authorities have under the Wildlife and Countryside Act 1981 Act is to give Natural England notification of any activities that we are involved with that would be liable to cause damage to any flora, fauna, geographical or physical features within an SSSI. The Natural Environment and Rural Communities Act 2006 Act requires that Local Authorities must conserve biodiversity when exercising any of its functions.

District and Borough Authorities do have permissive powers under the various drainage and public health acts to deal with ponds, pools, ditches, culverts and gutters likely to be prejudicial to health. These powers can require works but local authorities have no absolute duty to exercise these powers. Only if Authorities chose to exercise these permissive powers do they then have a duty to conserve the environment.

Similarly the County Council will always need to secure compliance with the Habitats Directive whilst exercising its functions as the Lead Local Flood Authority. County has acquired additional duties, powers and responsibilities under the Flood and Water Management Act 2010 as the Lead Local Flood Authority. They must develop, maintain, apply and monitor an over-arching strategy for flood risk management across their area and then, in turn prepare and execute local plans for areas of specific flood risk. By the property-based definition of local flood risk in the 2010 Act, such plans are inevitably for built-up areas and will not include the Cuckmere Valley or the Pevensey Levels, although parts of the Ouse may be included..

ESCC have a duty to investigate flood incidents (to the extent it considers necessary and appropriate) and ascertain which authority or private owner has flood risk management responsibilities and whether that authority or owner has or is proposing to exercise those functions. They also have to duty to maintain a register of structures and features which are considered to significantly affect flood risk and this would include structures in all three current IDB areas.

If there is no Drainage Board there is little within drainage law that compels landowners to improve drainage or conserve the natural environment.

It is important to remember that there can be a contradiction between land drainage and conservation legislation, especially in the Pevensey Levels. Good practice in trying to deal with flooding issues by clearing ditches and moving water through the system as fast as possible may actually run into conflict with conservation requirements to retain water in the area to support the Natural England Water Level Management Plan which looks to manage water levels and leave plant life in ditches, in order to conserve the biodiversity of the area.

The Minister has already indicated support for the EA decision to step away from the current arrangement as evidenced by the letter to the County Council. A copy of this letter from Owen Paterson to East Sussex County Council is attached for information in Appendix III. There is a generally held view that the Minister would be unlikely to dissolve the current arrangements without ensuring something satisfactory is in place. Counsel has in fact supported that view and stated that:

"I also think you all need to consider whether you would be better off with a newly constituted Board with the powers that affords you depending on the constitution of the new board"

If an IDD is abolished provision would need to be made for its property and assets to be transferred. If a new IDD or IDB is set up then the transfer of current assets and liabilities including debts and unrecovered levies ought to be transferred to the new body. In one example, where a board was abolished elsewhere and no new board was put in its place assets were, ironically, transferred to the EA, as the most appropriate organisation¹⁴. In another example where there was an amalgamation of IDD's the property was transferred to the new Board that was set up¹⁵.

Additionally if the EA is in receipt of any capital funds or expects to receive funds/income to help towards the running of any assets, then the rights to these funds need also to be transferred to any new IDB. The view is and it has been expressed that assets such as pumping stations should be in a minimum acceptable condition when handed over to any new IDB (in the same manner that ESCC will only adopt a road built to an agreed standard).

Counsel also advised that need to ensure that the composition of any new board should be appropriate and suggested that would be particularly important to have a Natural England representative on the Board.

If the decision is made to set up a new IDB consideration would need to be given to any TUPE provisions that may exist as the function for managing this area would be passing from the EA to the IDB. The view is that this would be more appropriately addressed at the stage that a decision was made to set up such a board.

¹³ In the matter of the proposal by the Environment Agency to stop acting as an Internal Drainage Board for the Internal Drainage Districts in East Sussex. Mary Cook. Cornerstone Barristers 13/08/2014

¹⁴ Abolition of the Houghton and Wyton Internal Drainage District Order 2004/3423

¹⁵ Amalgamation of the Foss Internal Drainage District and the Wilberfoss and Thornton Level Drainage Order 2011/810

How are IDB's governed

IDB's are non – profit making organisations.

There is a board that governs the IDB this is made up of Elected and Appointed Members.

The elected members are elected by the ratepayers in accordance with the Land Drainage Act 1991. They may be either owners or occupiers of land in the district or nominated by the owner/ occupier of the land in the district. Drainage ratepayers are eligible to vote and elections occur every three years.

Appointed Members are appointed by the charging authorities within the district again in accordance with the Land Drainage Act 1991. They may be elected councillors, officers or others who have an interest, such as conservation or business in the district. The no of appointed members that each local authority can have on the board is dependent on the percentage of the special level that is paid.

An example is the Romney Marshes Board is set out below.

The Romney marsh board covers five electoral districts.

District	Area of Drainage (ha)	Catchment Area (ha)	Area of Rated land (approx. ha)	No of elected members
Romney	10443	14552	9414	6
Walland (lowland only)	8916	8916	8377	6
Denge (lowland only)	3818	3818	960	2
Rother	6592	48240	6070	4
Pett	3401	18380	2570	3
Total	33170	93936	27391	21

Charging Authority	% of Total Special Levy	No of Appointed Members
Ashford Borough Council	2	1
Rother District Council	21	7
Shepway District Council	77	14
Total	100	22

An introduction to Internal Drainage Boards (IDBs)



Association of Drainage Authorities
The national representative of IDBs in England & Wales

What is an Internal Drainage Board?

An Internal Drainage Board (IDB) is a local public authority that manages water levels. They are an integral part of managing flood risk and land drainage within areas of special drainage need in England and Wales.

Each IDB has permissive powers to undertake work to provide water level management within their Internal Drainage District (IDD), undertaking works to reduce flood risk to people and property and manage water levels for local needs. Much of their work involves the maintenance of rivers, drainage channels, outfalls and pumping stations, facilitating drainage of new developments and advising on planning applications. They also have statutory duties with regard to the environment and recreation when exercising their permissive powers.



The forerunners of today's IDBs date back to the time of Henry III who established a Commission for drainage of Romney Marsh in Kent in 1252. Most IDBs today were established by the Government following the passing of the Land Drainage Act 1930. The activities and responsibilities of IDBs are currently controlled by the Land Drainage Act 1991 as amended by subsequent legislation. IDBs are also defined as Risk Management Authorities within the Flood & Water Management Act 2010 alongside the Environment Agency, local authorities and water companies.

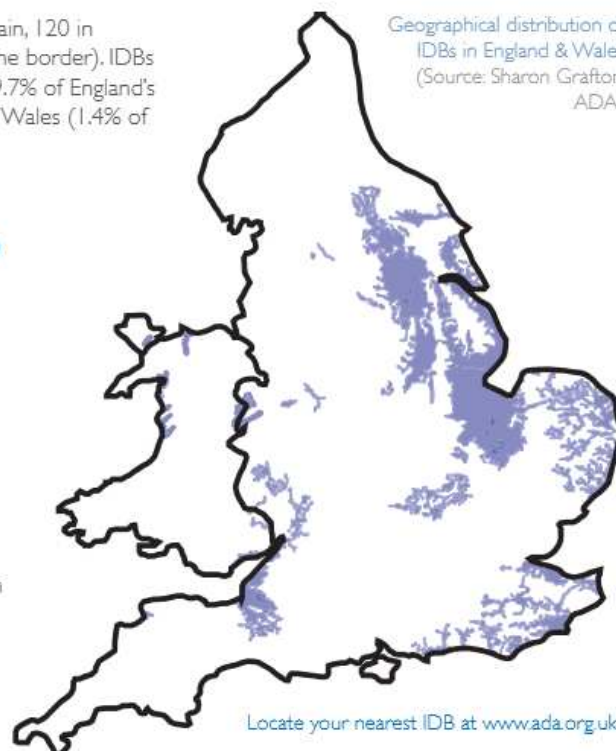
Today, there are 121 IDBs in Great Britain, 120 in England and 3 in Wales (2 IDBs cross the border). IDBs cover 1.2 million hectares of England (9.7% of England's total land area) and 28,500 hectares of Wales (1.4% of the Wales' total land area).

Where can I find an IDB?

IDBs manage drainage districts which occur in areas of special drainage need. The district each IDB covers is therefore determined by the local hydrology and not by political boundaries such as those of counties.

They either occur in broad open areas of lowland such as The Fens, Somerset Levels or Humberhead Levels or within the floodplains of rivers.

IDBs are geographically concentrated in Cambridgeshire, Kent, Lincolnshire, Norfolk, Nottinghamshire, Somerset and Yorkshire.



Locate your nearest IDB at www.ada.org.uk

What are IDBs responsible for?

IDBs' primary role is to manage water levels and reduce the risk from flooding within their districts. Much of their work involves the maintenance and improvement of watercourses and related infrastructure such as pumping stations, weirs, sluices, culverts and embankments within their drainage districts.

Under the Land Drainage Act 1991, each IDB exercises a general power of supervision over all matters relating to water level management within its district. In pursuance of this role they can prohibit the obstruction of watercourses within their district. Thus, anyone constructing or altering a weir, bridge, embankment, culvert or similar obstruction must first seek the consent of the IDB before undertaking works. IDBs also have a series of bylaws relating to the management of watercourses and can designate features and structures within their district which relate to managing flood risk. A designation prevents the owners from altering, removing or replacing the structure or feature without the consent of the IDB.

IDBs input into the planning system by facilitating the drainage of new and existing developments within their districts, and advising on planning applications, specifically the use of sustainable urban drainage systems (SuDS).

IDBs conduct their work in accordance with a number of general environmental duties and promote the ecological wellbeing of their districts. They have a specific duty to further the conservation and enhancement of all designated environmental sites within their districts such as SSSIs.

Some IDBs may also have other duties, powers and responsibilities under specific legislation. For instance the Middle Level Commissioners and Witham Fourth District IDB are also navigation authorities. During drought IDBs play a key role in keeping water levels higher and facilitating the transfer of water.

Defra is the Government department responsible for IDBs and the work of an IDB is closely linked with that of the Environment Agency and Lead Local Flood Authorities (and Local Authorities over planning issues).

IDBs are not, however, responsible for watercourses designated as main rivers within their drainage districts; the supervision of these watercourses is undertaken by the Environment Agency.



Why are IDBs so important to the UK?

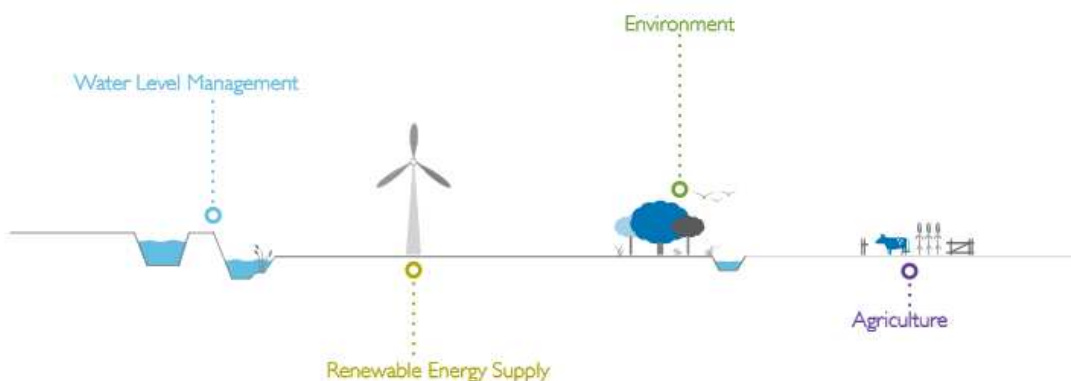
Covering 1.2 million hectares of England (9.7% of the total land area) and 28,500 hectares of Wales (1.4% of the total land area), IDBs have a significant operational role within the following areas:

WATER LEVEL MANAGEMENT

IDBs' primary role is to manage water levels and reduce the risk from flooding within their districts. Much of IDBs' work involves the maintenance and improvement of watercourses and related infrastructure such as pumping stations, weirs, sluices, culverts and embankments within their drainage districts. IDBs are responsible for the maintenance of over 22,000km of watercourses located within their districts.

RENEWABLE ENERGY SUPPLY

Currently over 30 onshore windfarms and 6 planned (1 operational) bio-energy power stations are located within IDB districts. Such sites will need careful water level management to avoid flooding or damage to associated infrastructure. Other renewable energy production techniques are currently being considered by IDBs with regards to powering pumping stations with micro-generation, such as solar photovoltaic, micro wind, hydro and combined heat and power plants.



ENVIRONMENT

IDBs conduct their work in accordance with a number of environmental duties, and aim to promote sustainability and the ecological wellbeing within their districts. Every IDB has its own Biodiversity Action Plan and strives to maintain watercourses as sympathetically as possible. They have a specific duty to further the conservation and enhancement of all designated environmental sites within their districts, including 398 SSSIs.

AGRICULTURE

There are approximately 50,000 farms or land-holdings within IDB districts in England & Wales growing crops and raising livestock for food. The service provided by IDBs underpins the food production of the majority in the most valuable and productive land in the UK, with over 50% of Grade 1 agricultural land in England situated within IDBs. Water level management by IDBs is an essential component to continuing the food security of the UK.

TRANSPORT

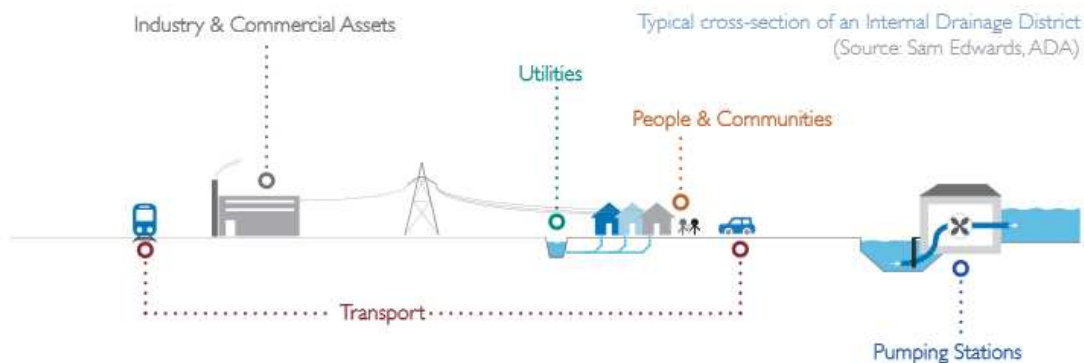
Approximately 129 miles of motorway and 910 miles of railway runs through IDB districts. Including major commuter links, such as the A1, M4, M5 and the East Coast Mainline connecting London to the South West, Wales, North East and Scotland. Without efficient and continuous water level and land management from IDBs, and communication with other transport authorities, loss of these transport routes would affect millions of commuters every year.

INDUSTRY & COMMERCIAL ASSETS

Although primarily rural, some IDB districts also contain several other significant industrial or commercial assets: 42 caravan/leisure parks and 68 major industrial premises (including the Port of Grimsby & Immingham in the Humber Estuary, which is the UK's largest port by cargo tonnage – importing 20 million tonnes of oil and 10 million tonnes of coal per annum – and 13th largest in Europe).

UTILITIES

Within England and Wales there are 201 operational major power stations that supply the UK's high demand for electricity. Of these major power stations 56 are located within Internal Drainage Districts, equating to 53% of installed capacity (potential maximum power output). Water supplies (both domestic and commercial) rely on effective water level and quality management, all of which would suffer from no IDB action.



PEOPLE & COMMUNITIES

IDBs play a key role in directly reducing flood risk to 600,000 people who live and/or work within IDB boundaries, and 879,000 properties (domestic and commercial). Notwithstanding this, the total infrastructure that complements these communities would also be greatly affected. Local Authorities pay a 'special levy' to IDBs for people, property and infrastructure, benefitting from their work.

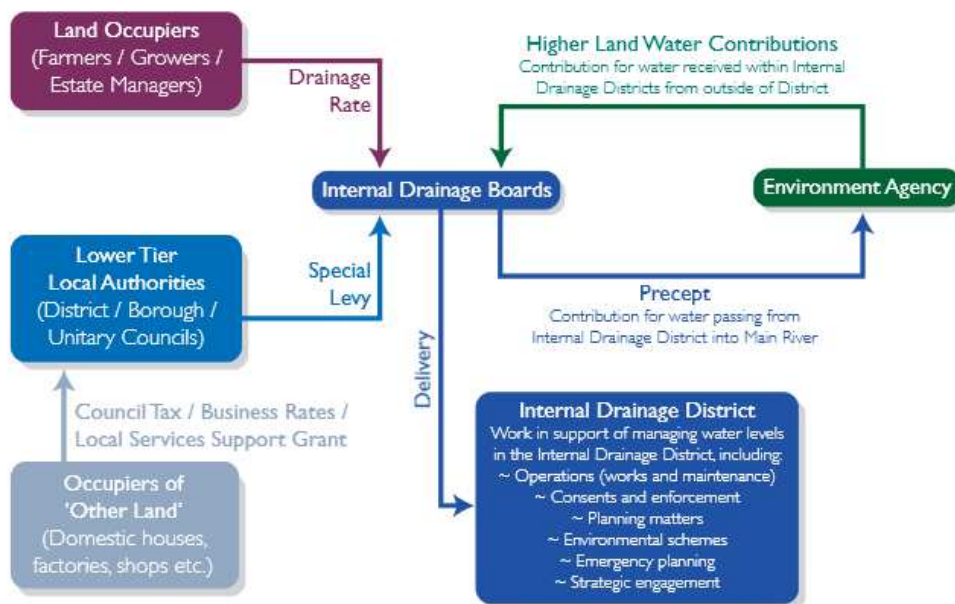
PUMPING STATIONS

The majority of IDB districts require pumping to some degree for water level management, the rest are reliant on gravitational flows to main rivers and estuaries. 53 IDBs have more than 95% of their area dependent on pumping. 635,722 hectares of land in IDB districts rely on pumping – almost 51% of the total. This is facilitated by at least 500 pumping stations.

How are IDBs funded?

The expenses of an IDB are predominantly funded by the local beneficiaries of the water level management work they provide. Each IDB sets a budget for its planned work in the forthcoming year and any investments it needs to make for future projects. Section 36 of the Land Drainage Act 1991 determines that these expenses of an IDB shall be met by:

- Drainage rates collected from agricultural land and buildings within the Internal Drainage District;
- Special Levies issued on District and Unitary Authorities within the Internal Drainage District;
- Contributions from the Environment Agency (see Higher Land Water Contributions (HLWC) from EA to IDB).



Flow chart of IDB finance input and outputs
(Source: Ian Moodie, ADA)

Drainage Rates and Special Levies

All land and properties within a Drainage District are deemed to derive benefit from the activities of an IDB and therefore subject to contributions to the expenses of the IDB paid annually to the Board. For the purposes of rating, properties are divided into

- a) Agricultural Land and Buildings (farmhouses, barns, stables, silos etc.)
- b) Other Land (such as domestic houses, factories, shops etc.).

Occupiers of all "Other Land" pay Council Tax, Business Rates or Local Services Support Rates to the District or Unitary Authority who then are charged a Special Levy by the Board in proportion to the annual value of this "Other Land".

The Board, therefore, only demands Drainage Rates direct on Agricultural Land and Buildings.

The division of the expenses of the IDB raised via drainage rates versus special levy is determined by the total annual value of all agricultural land and buildings in the Internal Drainage District versus the total annual value of all other non-agricultural land and buildings within the Internal Drainage District.

As land moves out of agricultural production and is built on so the appropriate rates and levies are adjusted proportionately. The IDB can be informed of such changes either directly by the land occupier/owner or by the respective Council's District Valuer.

Note: Differential Rates | Section 38 of the Land Drainage Act 1991 enables the division of Internal Drainage Districts for the purposes of setting different drainage rates and special levies in each sub-district. In principle, Differential Rates are only used to reflect differential levels of service from an IDB. This may occur where a part of the District is pumped and another part drains under gravity, or where some parts of the District receive a reduced or enhanced level of benefit from IDB activity (e.g. significantly higher land within the District, or coastal land within the District). For more information, seek the Association of Drainage Authorities' briefing paper for IDBs on Differential Rating Orders at www.ada.org.uk.

Higher Land Water Contribution (HLWC) from EA to IDB

Higher land water contributions (also known as highland/higher level water contributions) are enabled under Section 57 of the Land Drainage Act 1991. An IDB may make an application to the Environment Agency for a contribution in relation to the quantity of water which that district receives from lands at a higher level outside of the Board's district.

It provides funding to contribute to additional water management pressures and therefore additional pumping/maintenance required to manage water from higher in a catchment entering an IDB's Drainage District. Applications for HLWC are made on an annual basis, and their payment are at the discretion of the Environment Agency.

Additional funding

IDBs can also secure grants to assist with the funding of capital and environmental works projects via Flood Defence Grant in Aid (FDGiA) from Defra, the lottery funding agencies and the European Union where appropriate. In May 2011 the Secretary of State for the Environment introduced a new Partnership Funding policy for flood and coastal risk management projects in England which encourages funding to be secured from sources other than FDGiA. Thus the level of FDGiA funding a project receives relates directly to the public benefits it delivers as set out in the Outcomes Measures guidance available on the Environment Agency's website.

Environment Agency Precept (from IDB to EA)

Section 141 of the Water Resources Act 1991 enables the Environment Agency to issue precepts to IDBs requiring payment of any amount required to be contributed by those Boards towards the expenses of the Environment Agency.

The Precept allows local funds raised by an IDB to finance works essential to the Main River (statutory designated watercourses which are the responsibility of the EA) within, adjacent or flowing from or into an IDB's Drainage District. In principle the money is raised by the EA from the IDB for the benefit of the respective District or Districts served. The payment of an EA Precept is compulsory, however an IDB may appeal this precept if they feel it unfair, and may request details of how it has been spent by the Agency.

Financial Security

Long-term certainty of finance is essential to sound water level and flood risk management. Water level management is a daily job, requiring regular action, which must be planned well in advance. In contrast, flood risk mechanisms may only be tested infrequently but must meet the standards demanded of them on these critical occasions. Both activities transcend political and spending periods as currently set out by the Government.

www.ada.org.uk

7



Association of Drainage Authorities
The national representative of IDBs in England & Wales

Acknowledgements

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Dr Jean Venables CBE FREng FICE MCIWEM – Chief Executive

Ian Moodie MSci – Technical & Research Assistant

Sam Edwards BSc AIEMA – Researcher & Production

Cover photo

'Water Vole-enters' – Watching water voles in an IDB channel
Cliff Carson (Middle Level Commissioners)

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Early morning at South Walsham (Source: Pete Butler)

Booklet designed by Sam Edwards, ADA

Appendix B: Executive Summary excerpt from Pevensey Levels Water Level Management Plan review 2014 (Environment Agency and Natural England)¹⁷

Pevensey Levels Water Level Management Plan review 2014

Technical assessment for the future management of the Pevensey Levels Site of Special Scientific Interest

Environment Agency and Natural England

14/10/2014
Final report

ATKINS



¹⁷ Draft 14 October 2014.

Executive Summary

Water Level Management Plan Review 2014

Natural England and the Environment Agency have commissioned a Water Level Management Plan Review of the Pevensey Levels Site of Special Scientific Interest (SSSI), hereafter known as 'the SSSI'. The review comprises three parts:

- An assessment of the success of the 2006 Plan implementation and recommendations for improving water level management
- The development of an operating manual to help future organisations manage water levels
- A technical assessment for the future management of the SSSI

This report forms part of the technical assessments and explores the possible routes for future management of the Pevensey Levels, and the associated impacts on costs and the benefits. This includes an assessment of the impact on flooding, farming systems and conservation features from switching off the pumps.

The economic and environmental importance of managing water levels on Pevensey Levels

The Pevensey Levels SSSI, Ramsar and Special Area of Conservation (SAC), is a nationally and internationally important wetland site of approximately 450km of freshwater ditches dissecting 3,500 ha of wet grassland. The site is nationally important for the wintering lapwing flocks which feed on the wet ditches, and is internationally important for the diversity of plants and animals found in the freshwater ditches. Stable ditch water levels year round are crucial for the nature conservation interest of the site.

The area has 60 active farms and approximately 200 landowners. Most of the SSSI is given over to cattle and sheep grazing, with some arable cropping on the periphery. The traditional farming practices on the Levels – which include extensive grazing and rotational ditch management – are linked to the exceptional biodiversity value of the SSSI (see photos below). Water level management also benefits farming practice on the Levels: by ensuring ditches provide wet fencing, drinking water and good quality grazing for livestock.



Traditional grazing practices and poaching of ditch margins by cattle (left) are important in maintaining the wetland habitat which supports the biodiversity interest including fen rafter spider (right)

A benefit assessment of maintaining the SSSI under the Water Level Management Plan was undertaken. This assessment used Defra's benefit assessment toolkit developed from the 'IDB Beneficiaries and Performance Indicators (FD2659)' project. The toolkit was developed through consultation with a number of

IDBs and tested with six case study IDBs. The toolkit uses benefit categories defined in the Eco-systems Services Framework which reflect the range of goods and services that the environment provides to people. The application of the tool to the SSSI quantified the following annual benefits to the local area, every year:

- Biodiversity £11M – Protection of nationally important habitats and species requiring stable water level regimes, currently provided by the IDB.
- Transport £3M – Flood protection to 13km of mainline railway, 4 railways stations, and 19km of road including the A259, Whartling Road, Sluice Road and Rickney Lane, Newbridge Road and Down Ash Road
- Food production £1.5M – Flood protection to 236ha of arable land fringing the SSSI, and at least 1754ha of grazing land in the SSSI
- Recreation £1M – Approximate annual income of Cooden Beach golf club
- Carbon -£0.15M – Loss of carbon sequestration potential.

The total benefit of maintaining the SSSI as it currently is, even without biodiversity value, equates to approximately £5M per year.

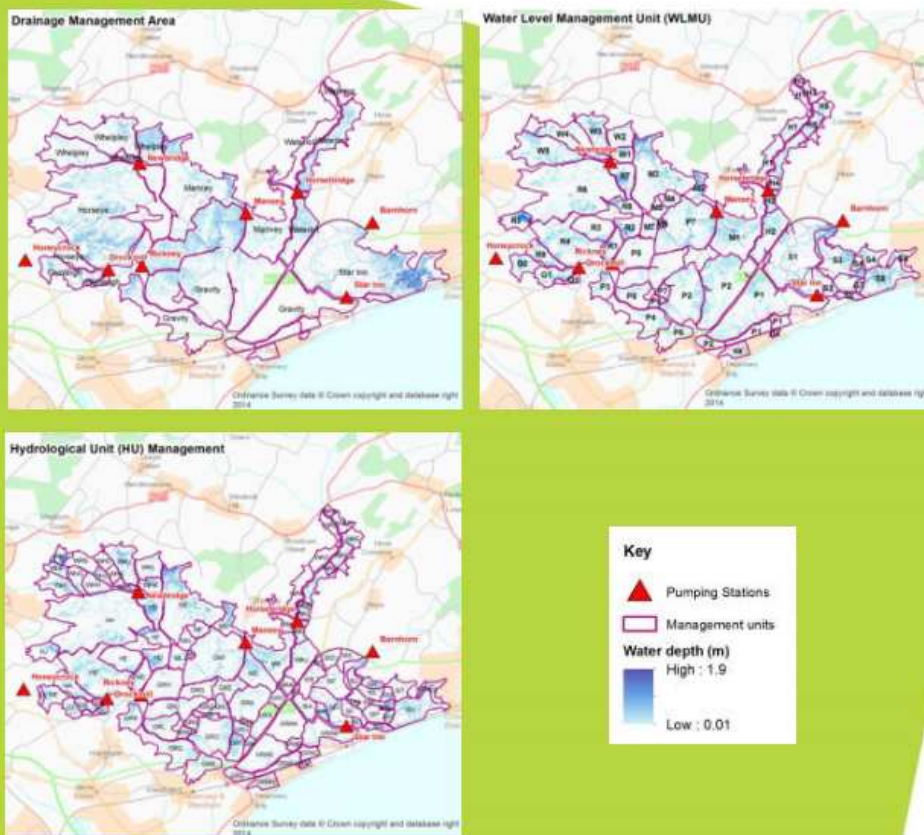
The current Internal Drainage Board

Water level management is currently undertaken by an Internal Drainage Board (IDB), responsible for the Internal Drainage District (IDD). An IDD is an area of special drainage need, normally administered by an IDB. An IDB gathers revenue through drainage rates from landowners and local authorities across the IDD to fund its activities which include managing water levels, land drainage and flood risk. At present, the Environment Agency operates as the IDB although in March 2016 this responsibility will be handed over to another organisation subject to the approval of the Secretary of State.

Current Water Level Management

The 2006 Plan appraised three scales of water level management which could achieve the objectives of the SSSI; Hydrological Units (HU), 104 units; Water Level Management Units (WLMU), 42 units; and Drainage Areas (DA), 8 areas. Hydrologically, management at the DA level was the preferred option due to the simplicity of only requiring 8 pumping stations to operate, however the loss of flexibility in water level management across large areas of the Levels was not supported by local landowners, and could lead to water levels in some parts of the SSSI being too deep or too shallow for conservation purposes. At the HU scale – water level management would be highly flexible but maintaining it at this level would be expensive to operate. HU scale management requires a greater onus on landowners to operate structures on their land using structures which are not operated by the IDB or Environment Agency.

At a WLMU scale, some of the flexibility under the HU option is retained using fewer structures and at lower cost. This was identified as the preferred option during stakeholder meetings, and was supported by the majority of local landowners as it delivers a range of benefits to local farming business. Consultation with landowners during the 2014 review, showed that water level management at the WLMU scale continues to be the favoured option.



Costs of managing the water levels on the Pevensey Levels

This review has provided a high level cost assessment of managing the SSSI under three alternative institutional scenarios:

1. **Independent IDB**
A new independent IDB takes over running of the Pevensey Levels in 2016, continuing with management at the WLMU scale.
2. **IDD group**
A group of IDBs work together in one IDD to lower running costs by exploiting the economies of scale associated with managing a larger geographical area. For example – the Pevensey IDB could be grouped with the IDBs of Ouse and Cuckmere.
3. **Riparian Ownership**
The IDB is dissolved and riparian owners are made responsible for managing water levels based at the HU scale. This requires the management of structures on ditches owned by landowners.

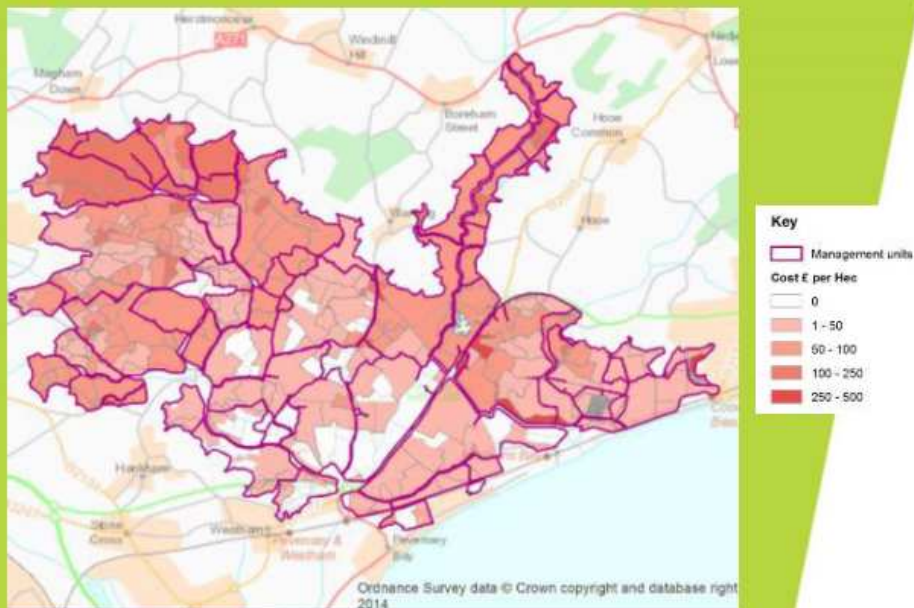
As well as the direct costs of managing the SSSI by the above groups, the assessment includes additional resources that would be required by Defra and Natural England to manage the SSSI. The table below summarises the 'headline' costs under each institutional arrangement. These costs were gathered using information on the current management of the Pevensey Levels IDD, discussion with other IDBs, and drawing on a national DEFRA review of IDB costs.

Riparian owner management of the SSSI is the most costly option overall. To the individual riparian owner, the costs will vary greatly not only based on the size of each landholding, but also on the number of structures and assets and the length of ditches requiring maintenance. Under this scenario, the costs to riparian owners could vary from zero, where a landowner has no IDB watercourses or operated structures on their land, to £500 per hectare where there is a large cluster of assets and watercourses requiring maintenance. The map below presents this variation, with an average cost of £64 per hectare.

Cost and benefit (annual average) summary of managing the water levels of the Pevensy Levels in different institutional arrangements

Institutional arrangement	Hydrological arrangement	Total costs	Principal risks and benefits - pumps on
1. Independent IDB	WLMU	£343k	<ul style="list-style-type: none"> Organised and cost effective water level management – no increase in Natural England management costs
2. IDD Grouping	WLMU	£312k	<ul style="list-style-type: none"> Organised and cost effective water level management. – no increase in Natural England management costs Reduced administration costs compared with the IDB.
3. Riparian Owners	HU	£539k	<ul style="list-style-type: none"> Low direct running costs of water level management (although these costs would represent significant proportion of farmers' income). Significant impact on local farming businesses. Increase in Natural England management costs for SSSI Management unlikely to be effective, increasing damage to the SSSI and reducing farm income.

Current annual land drainage rates paid by landowners for the management of the IDB are £2 per hectare. Based on the 2013 Farm Business Survey, annual profits for lowland rough grazing of cattle and sheep in the south east of England equate to £4 per hectare. In summary, the cost to riparian owners of riparian owner management would be many times their profits, making the current farming businesses on the SSSI financially unsustainable. In addition, the cost of management would have a significant negative impact on land prices, making it difficult for farmers to sell land.



Additional issues and costs following IDD dissolution

The Local Authority would have powers over and responsibilities for ordinary watercourses. These include every river, stream, ditch, drain, cut, dyke, sluice, sewer (other than a public sewer) and passage through which water flows, but which does not form part of main river. Local Authority responsibilities would include:

- Carrying out works to manage flood risk contributing to the local flood risk management strategy
- Serving notice on riparian owners failing to maintain a watercourse adequately to manage flood risk
- Consenting Flood Defence works

It is expected that the Local Authority would need to serve notice on riparian owners more frequently than at present if the IDD were dissolved. Taking on the additional duty of consenting on Flood Defence works in an SSSI would be further complicated by the need for accompanying Habitat Regulations assessments. These processes will require additional Local Authority resources – in addition to the costs estimated above.

Natural England would require more resources to ensure the delivery mechanisms available for water level management work. Additional resource would be required for the surveillance of structures, serving management schemes, and enforcement actions – estimated as an additional £263k per year (Appendix C provides more information on the cost calculations).

Investigating other scenarios for water level management on Pevensy Level

Whilst the drainage area scale management of the SSSI (see map below) was discounted during the 2006 review, management of the 8 drainage areas by a new IDB or IDD group would provide a cost saving of 10%. This option is being re-appraised as part of the 2014 review.

The pumping stations account for approximately two thirds of the running costs of the IDB and IDD group. This review has included a high level assessment of the impact of turning off the eight pumping stations on the Levels. Given that average actual evapo-transpiration exceeds rainfall volumes in the months of April to July but rainfall exceeds evaporation rates over the course of a year, switching off the pumping stations would cause approximately two thirds of the area to be wet for eight months of the year on average, which is likely to have an impact on the flood defence asset residual life. The maps below show the simulations for turning all pumps off during the 2013 / 2014 winter period which saw one of the wettest winters on record.

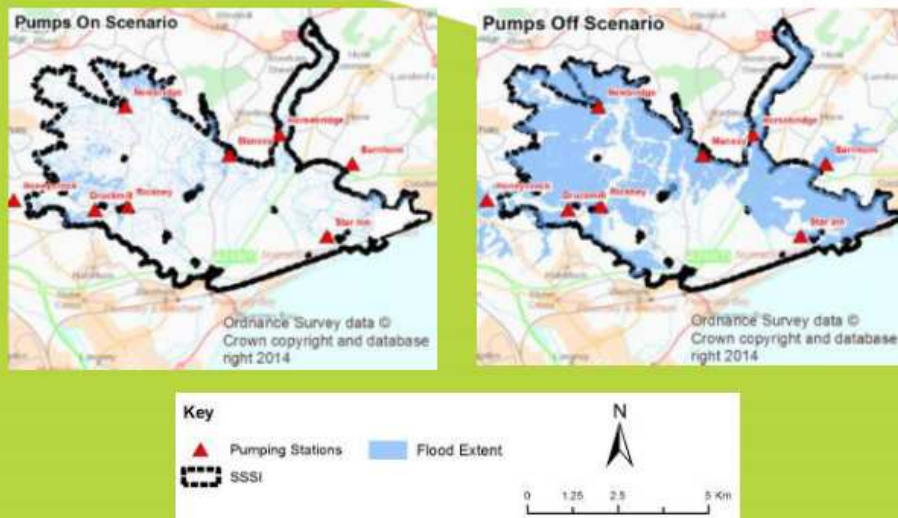
This winter period was tested since the active operation of the pumps and structures by the IDB led to minimal flooding of the SSSI, and therefore this period was a suitable test-case for a pump off situation. A winter rather than summer scenario was tested since it is in winter when the pumps are most active across the Levels, and when the majority of the electricity running costs occur. Net evaporation losses in the summer means that the pumps are generally only required during high intensity storms or in areas of high discharge inputs e.g. discharge from the Hailsham South sewage treatment works.

Switching off the pumps would not only affect the conservation value of the SSSI which requires stable water levels throughout the year (see Appendix E for more information), but would make the current farming businesses on the Levels unsustainable. Farmers currently participating in Environmental Stewardship Schemes would be unable to deliver them. Whilst the simulation switched off all eight pumps, switching off only one or two would be expected to have a similar level of impact in the individual pumped drained area affected, since these operate as isolated units. Reducing the pumping operation rather than switching them off would reduce the antecedent water attenuation capacity of the Levels – this could increase the risk of flooding. However, there may some scope to reduce the operation of the pumps by raising the pump trigger levels above their current level during drier periods of the year. This would help support the conservation objectives of the SSSI where the summer pump levels are depressing water levels. Switching off isolated pumps or reducing pump operations would require consultation with local landowners.

Apart from management of the SSSI at the HU, WLMU and DA scale with the pumps in operation – there are no other viable options identified which would successfully balance the requirements of the local landowners and current conservation objectives. Reducing the operation of the pumps (and hence the costs) however is being examined as part of the current 2014 review.

Cost summary of managing the water levels of the Pevensy Levels at a WLMU and DA scale

Institutional arrangement	Total costs at WLMU scale	Total costs at DA scale	Pump costs
1. Independent IDB	£343k	£308k	£217k
2. IDD Grouping	£312k	£281k	£196k



Conclusions

- IDB and IDD group management of the SSSI will provide organised and cost effective water level management. The IDD group being slightly more cost effective due to low administration costs
- Riparian owner management is the most costly scenario going forwards
- Riparian owner management will lead to additional costs to landowners from funding water level management, and potential losses in income from agri-environment scheme fines. This situation would make current farming systems on the SSSI financially unsustainable
- Under riparian owner management there is an increased risk that structures will be incorrectly operated, requiring additional resource in Natural England as well as from Local Authorities to perform their flood risk management duties
- In all cases, water level management of the SSSI delivers benefit many times its cost of operation: ~£5M (transport, food, recreation), and ~£11M (biodiversity), per year
- IDB and IDD group management of the SSSI at the DA rather than WLMU scale could provide a 10% cost saving in future management. This change would require further appraisal against the SSSI conservation objectives and discussion with the local landowners
- Pumping station costs amount to approximately two thirds of the total running costs of the SSSI
- Switching off the pumping stations would deliver a large cost saving to the organisation managing the SSSI. However, the frequency and extent of flooding would affect the conservation value of the site, reduce the residual life of flood defence assets, and make current farming systems on the SSSI unsustainable

Recommendations


Riparian owner management of the SSSI does not appear to be a sustainable scenario for the Pevensy Levels, nor does switching off the pumps. It is therefore recommended that, when the Environment Agency cannot continue to act as IDB, a new independent IDB or an IDD group is established to continue the strategic and successful management of the SSSI whilst the pumps remain in operation.


The 2014 review is examining water level management of the SSSI over the short to medium term. A longer term strategic review of the sustainability of the SSSI under future climate change should be considered – particularly the viability of current management practices under predicted sea level rises and more intense rainfall events, both of which may affect the ability of the structures and pumps to maintain the desired water levels for conservation and farming purposes.

Appendix C: Government Correspondence

Letter from Owen Paterson MP, May 2014

Scanned & forwarded to Nick Claxton, Tom Schindl & Tom Crabshaw 30/5/14

 Department for Environment Food & Rural Affairs



Nobel House
17 Smith Square
London SW1P 3JR


T 08459 335577
helpline@defra.gsi.gov.uk
www.gov.uk/defra

Councillor Keith Glazier
Leader East Sussex County Council
County Hall
St Anne's Crescent
Lewes
East Sussex BN7 1UE

Our ref: 342797

nd. May 2014

The Rt Hon Owen Paterson MP
From the Secretary of State





Thank you for your letter of 19 March about the Environment Agency's plans in relation to the Internal Drainage Districts that it currently manages in East Sussex.

As you know, for historic reasons the Environment Agency currently administers eight Internal Drainage Districts (IDDs) in the south east of England, including three in East Sussex. These are the only remaining areas in the country where the Environment Agency effectively acts as an Internal Drainage Board, and the role the Agency fulfils there is primarily concerned with local land drainage rather than managing flood risk to people and property.

It is important that the Environment Agency should focus its efforts and resources on those areas where the consequences of flooding for communities, businesses, property and infrastructure are greatest. This is in line with its strategic role and flood risk management responsibilities as set out under the Flood and Water Management Act. I feel strongly that responsibility for managing local watercourses more appropriately sits with expert local bodies, including local authorities and Internal Drainage Boards, since these bodies are best placed to take decisions on local priorities in discussion with their communities. I am keen that we should enable such bodies, and individuals such as riparian landowners, to act effectively at local level to achieve the outcomes that communities want to see.

I therefore support the Environment Agency's objective in transferring the management of these districts to local ownership, as soon as practically feasible.

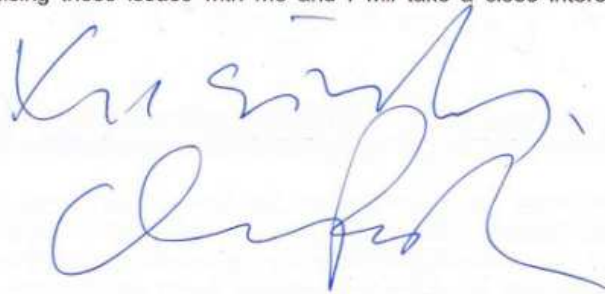
I understand that there have already been extensive local discussions on the most effective way of managing watercourses in these areas on a local basis going forward, including

  INVESTORS IN PEOPLE

through an East Sussex Steering Group which was established in May 2013 and is chaired by the local Rivers Trust. I welcome the work that your authority has already put into this, and I recognise that some complex issues have been under discussion particularly in relation to the Pevensey area. I would now encourage your councils to play a leading role in seeking to build a local consensus on the preferred solution for future management of water levels in these areas and in driving this forward. I have asked the Environment Agency and Natural England to stand ready to work with you and other local interests in addressing any barriers to the preferred local solution.

While I do not see a case for delaying further the action necessary to dissolve the EA operated IDBs in West Sussex, I do recognise that there will be a need for support and flexibility from the Environment Agency to enable the transition to new local management arrangements. In particular, I agree that the transfer of the IDD's to local management should be properly supported through transferring knowledge as part of the transition process and provision of clear, up to date records. The Agency would also be flexible in considering any request to undertake work on behalf of a local authority or other local management body on a temporary basis during the period whilst alternative management arrangements are put in place and bedded in.

I am grateful to you for raising these issues with me and I will take a close interest in progress going forward.



THE RT HON OWEN PATERSON MP



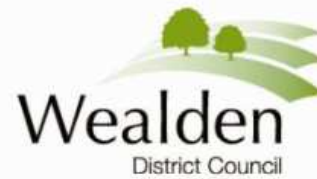
Letter from WDC to Eric Pickles, October 2014

OUR REF: LtrODowling031014

ASK FOR:

DATE: 3rd October 2014

YOUR REF:



Rt Hon Eric Pickles MP
Secretary of State for Communities
and Local Government
2 Marsham Street,
London,
SW1P 4DF

Portfolio Holder for Public Health and Community
Safety

Dear Secretary of State

Proposed Dissolution of Environment Agency Administered Sussex Internal Drainage Districts – Funding Arrangements

The Environment Agency (EA) have advised Wealden District Council that a decision has been taken at their Management Board to divest themselves of the responsibility for 'acting' as the Internal Drainage Board' (IDB) for the three EA administered Internal Drainage Districts (IDD) within East Sussex. It is understood that Department of Communities and Local Government (DCLG) and Department of Environment, Food and Rural Affairs (Defra) are supportive of the decision and have encouraged the EA to work towards alternative management arrangements for the existing EA administered IDD.

East and West Sussex Council wrote to Owen Paterson in March 2014 and they received a response from Defra in 22nd of May which confirmed that the Department supported the EA objective to transfer the management of the IDDs to local communities.

This Council is concerned about the proposal and is currently considering its view on this and on potential options for the future management of East Sussex IDDs.

One of the main issues is the funding for management of drainage and flooding issues. This Council has and still receives monies from the Department of Communities and Local Government through its Revenue Support Grant (to be superseded by the Settlement Funding Assessments SFA) to assist the Council in being able to fund the costs of managing the IDDs. The amount has been based upon the Special Levy that this Council has collected from its tax payers and passed on to the EA.

The funds comprise an important element in funding the managed IDDs. The difficulty for Wealden District Council is that there is a degree of uncertainty as to the future of the Settlement Funding Assessment. The Council is therefore writing to you to ask for clarification as to whether this funding will continue to be provided for this Local Authority if an independent IDB is set up and also whether the funding will continue if the decision is taken that the IDDs are no longer required within the locality.

Wealden District Council, Vicarage Lane, Hailsham, East Sussex BN27 2AX

T 01323 443322 DX 38303 Hailsham

E info@wealden.gov.uk W www.wealden.gov.uk



We understand that this is a concern for all the Local Authorities within East Sussex but Wealden are particularly affected as the Pevensey Level and Cuckmere IDD's lie almost entirely within this Authority's area. We therefore have significant concerns that the financial burden for this proposal will be passed on to our residents and this Local Authority.

In fact the perception is that this burden may increase as it is understood that neighbouring districts are concerned about the amount that they pay and may seek to lower their contribution in the medium to long term.

It would therefore be appreciated if you could confirm the following:-

- If the decision was taken that an IDB is not required would Local Authorities still receive this SFA grant and be able to use this to fund the management of drainage and flooding works within its area. Would this Local Authority need to demonstrate that this funding had been ring fenced to this area?
- If a replacement IDB is proposed can you provide clarification as to what the position will be in regard to the SFA? Would the Local Authority still continue to receive this grant and how long would this be guaranteed for.
- If an IDB was set up and the Local Authorities concerned wished to amend their level of contribution would DCLG amend the amount of SFA accordingly and redistribute the amount provided to each Local Authority to cover any increased burden that may be incurred.
- Is it possible for a Local Authority to reduce their proportion of the Special Levy that they collect for an IDD? It is understood that this contribution is linked to the non-agricultural land value and is it likely or possible for the non-agricultural land value to be reassessed. Could you confirm how the level is calculated and whether there is a mechanism for varying the amount that is sent to a future IDB?

It is understood that East and West Sussex County Councils are also writing to you for clarification in relation to funding. Wealden District Council does however have particular issues in this case and wanted to ensure that we received some reassurances from your department as to what the situation would be if a decision was made to dissolve the existing IDD's without the provision for a direct replacement managed by an independent IDB.

The Pevensey Levels IDD lies almost entirely within the area of Wealden District Council geographical boundary and it is an internationally designated Ramsar site and a Special Area of Conservation. There is a risk of flooding throughout the IDD. The Pevensey Levels are largely on a flat coastal plain and the river outfalls and surface water drains can become tide-locked by high tides. This can contribute to river flooding during periods of high flows. When flooding occurs from Main Rivers or ordinary watercourses parts of the IDD can become inundated for several days, as land drainage can be restricted. Surface water and groundwater are additional sources of flood risk within the District and can contribute to increased water levels in ditches and standing water on fields.

The EA have provided information that assesses the order of magnitude of the net benefits of the work of the Pevensey IDD as being approximately £16million per annum.

The most significant benefits of the work of the IDD are:

- Protecting internationally and nationally important designated sites £11m
- Reducing damages as a result of flooding of road infrastructure, including diversionary costs and costs of delays (c £3m pa)
- Preventing loss of food production (c £1.5m pa)
- Reducing damages as a result of flooding of residential properties (c £1.25m pa)

Clearly the situation that occurred last winter across the country, particularly in the Somerset Levels, has raised the level of concern about the future management of these areas. This Local Authority are trying to ensure that we have sufficient information to make an informed decision as to what would be the best option for our area and look forward to receiving your response.

Yours sincerely,

Councillor Claire Dowling
Portfolio Holder for Public Health and Community Safety
Wealden District Council

Letter from EBC to Eric Pickles, October 2014

Rt Hon Eric Pickles MP
Secretary of State for Communities and Local Government
2 Maresham Street,
London,
SW1P 4DF

13th October 2014

Dear Secretary of State

Proposed Dissolution of Environment Agency Administered Sussex Internal Drainage Districts – Funding Arrangements

The Environment Agency (EA) have advised Eastbourne Borough Council that a decision has been taken at their Management Board to divest themselves of the responsibility for 'acting' as the Internal Drainage Board (IDB) for the three EA administered Internal Drainage Districts (IDD) within East Sussex. It is understood that Department of Communities and Local Government (DCLG) and Department of Environment, Food and Rural Affairs (Defra) are supportive of the decision and have encouraged the EA to work towards alternative management arrangements for the existing EA administered IDD.

East and West Sussex County Councils wrote to Owen Paterson in March 2014, and they received a response from Defra on 22nd May, which confirmed that the Department supported the EA objective to transfer the management of the IDBs to local communities.

This Council is concerned about the proposal and is currently considering its view on this, and on potential options for the future management of East Sussex IDBs.

One of the main issues is funding for the management of drainage and flooding issues. This Council has and still receives monies from DCLG through its Revenue Support Grant (RSG), to assist us in being able to fund the costs of managing the IDD. The amount has been based upon the Special Levy that we collect from our tax payers, and pass on to the EA. The monies comprise an important element in funding the managed IDBs. The difficulty for Eastbourne Borough Council is that there is a degree of uncertainty as to the future of the RSG. I am therefore writing to you to ask for clarification as to whether this funding will continue to be provided for this local authority if an independent IDB is set up, and also whether the funding will continue if the decision is taken that the IDBs are no longer required within the locality. This is of course also a concern for all of the local authorities within East Sussex.

It would therefore be appreciated if you could confirm the following:-

- If the decision was taken that an IDB is not required, would local authorities still receive the RSG and be able to use it to fund the management of drainage and flooding works within our area? Would this local authority need to demonstrate that this funding had been ring fenced to this area?

- If a replacement IDB is proposed can you provide clarification as to what the position will be in regard to the RSG? Would the local authority still continue to receive this grant and how long would this be guaranteed for?
- If an IDB was set up and the local authorities whose areas also fall within the IDD wish to amend their level of contribution, would DCLG amend the amount of RSG accordingly and redistribute the amount provided to each local authority to cover any increased burden that may be incurred?
- Is it possible for a local authority to reduce their proportion of the Special Levy that they collect for an IDD? It is understood that this contribution is linked to the non-agricultural land value and is it likely or possible for the non-agricultural land value to be reassessed. Could you confirm how the level is calculated and whether there is a mechanism for varying the amount that is received by a future IDB?

It is understood that East and West Sussex County Councils, and Wealden District Council are also writing to you for clarification in relation to funding. This is a matter of concern for us, as the Pevensey Levels IDD lies within the areas of Wealden District Council and Eastbourne Borough Council, and there is a risk of flooding throughout the IDD. It is an internationally designated Ramsar site and a Special Area of Conservation. The Pevensey Levels are largely on a flat coastal plain and the river outfalls and surface water drains can become tide-locked by high tides. This can contribute to river flooding during periods of high flows. When flooding occurs from the main river or ordinary watercourses, parts of the IDD can become inundated for several days, as land drainage can be restricted. Surface water and groundwater are additional sources of flood risk and can contribute to increased water levels in ditches and standing water on fields.

The EA have provided information that assesses the net benefits of the work of the Pevensey IDD as being approximately £16 million per annum. The most significant benefits of the work are protecting internationally and nationally important designated sites, reducing damages as a result of flooding of road infrastructure, including diversionary costs and costs of delays, preventing the loss of food production, and reducing damages as a result of flooding of residential properties.

Clearly the situation that occurred last winter across the country, particularly in the Somerset Levels, has raised the level of concern about the future management of these areas. We are keen to ensure that we have sufficient information to make an informed decision as to what would be the best option for our area, and look forward to receiving your response.

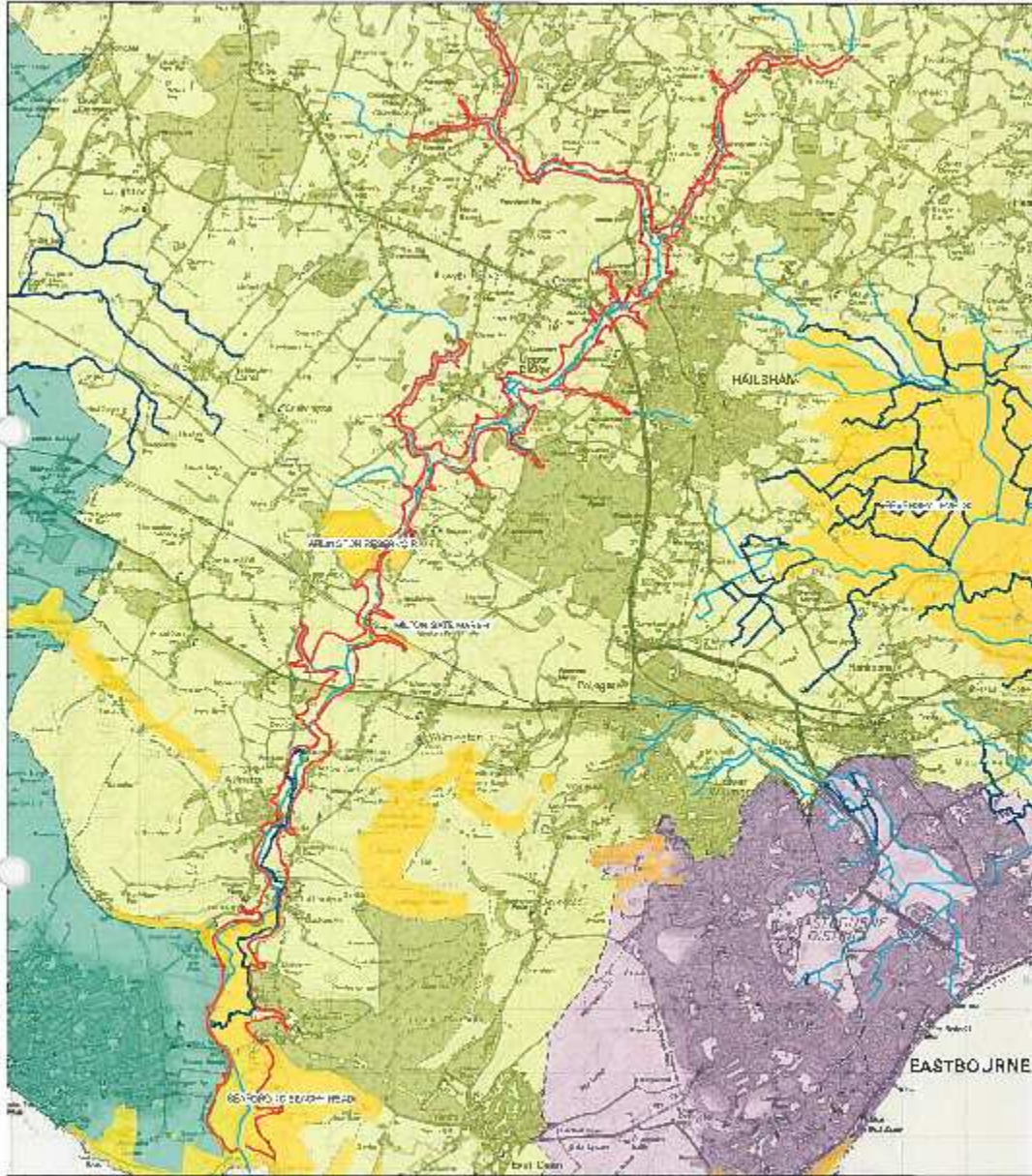
Yours sincerely,

Councillor Steve Wallis

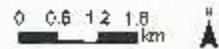
Portfolio Holder
Eastbourne Borough Council

Appendix D: Maps of IDD

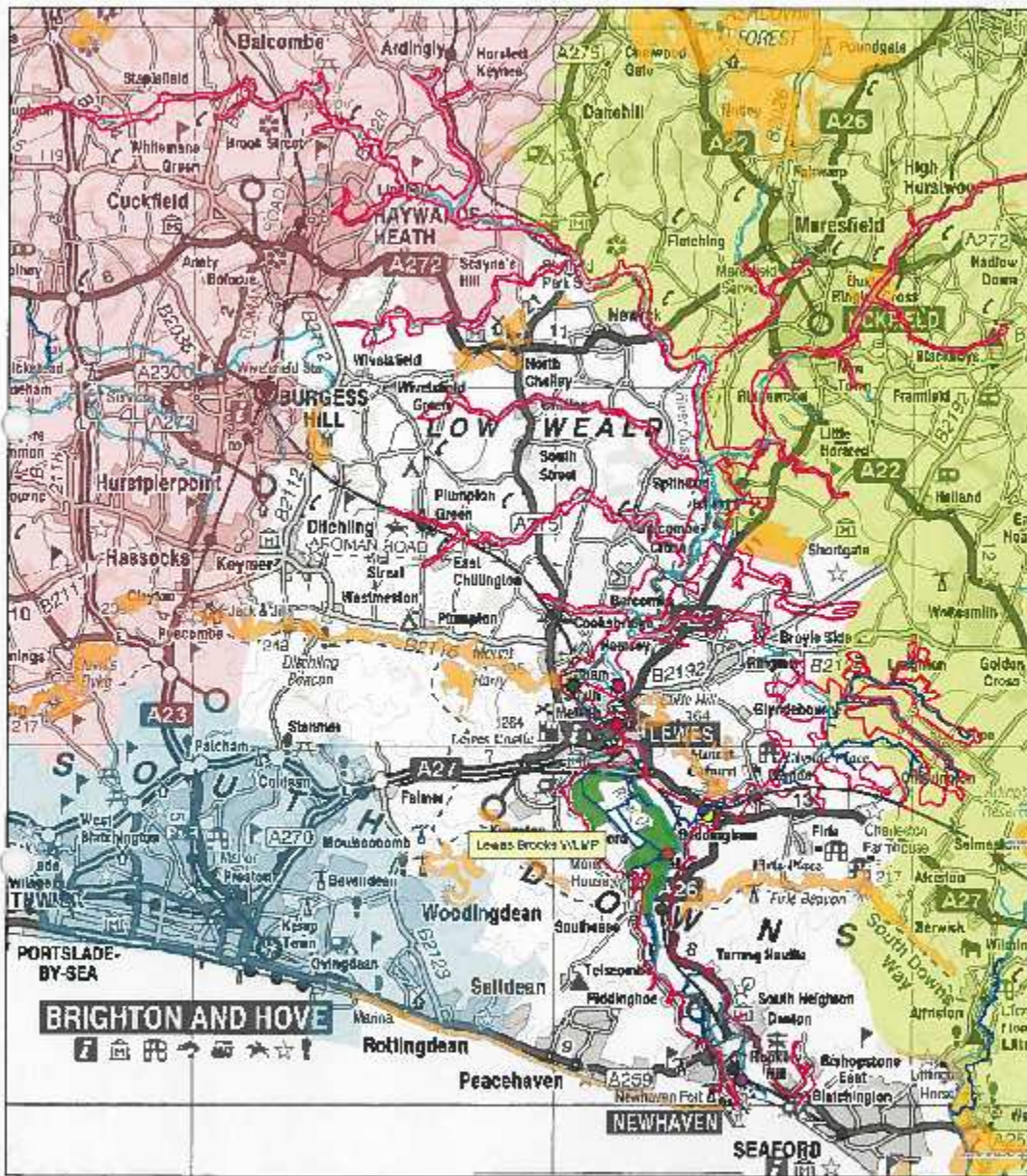
Cuckmere IDD



- Legend**
- Cuckmere ID
 - Mole River
 - CB Watercourse
 - RRRI
 - Eastbourne District (B)
 - Lewes District
 - Wealden District



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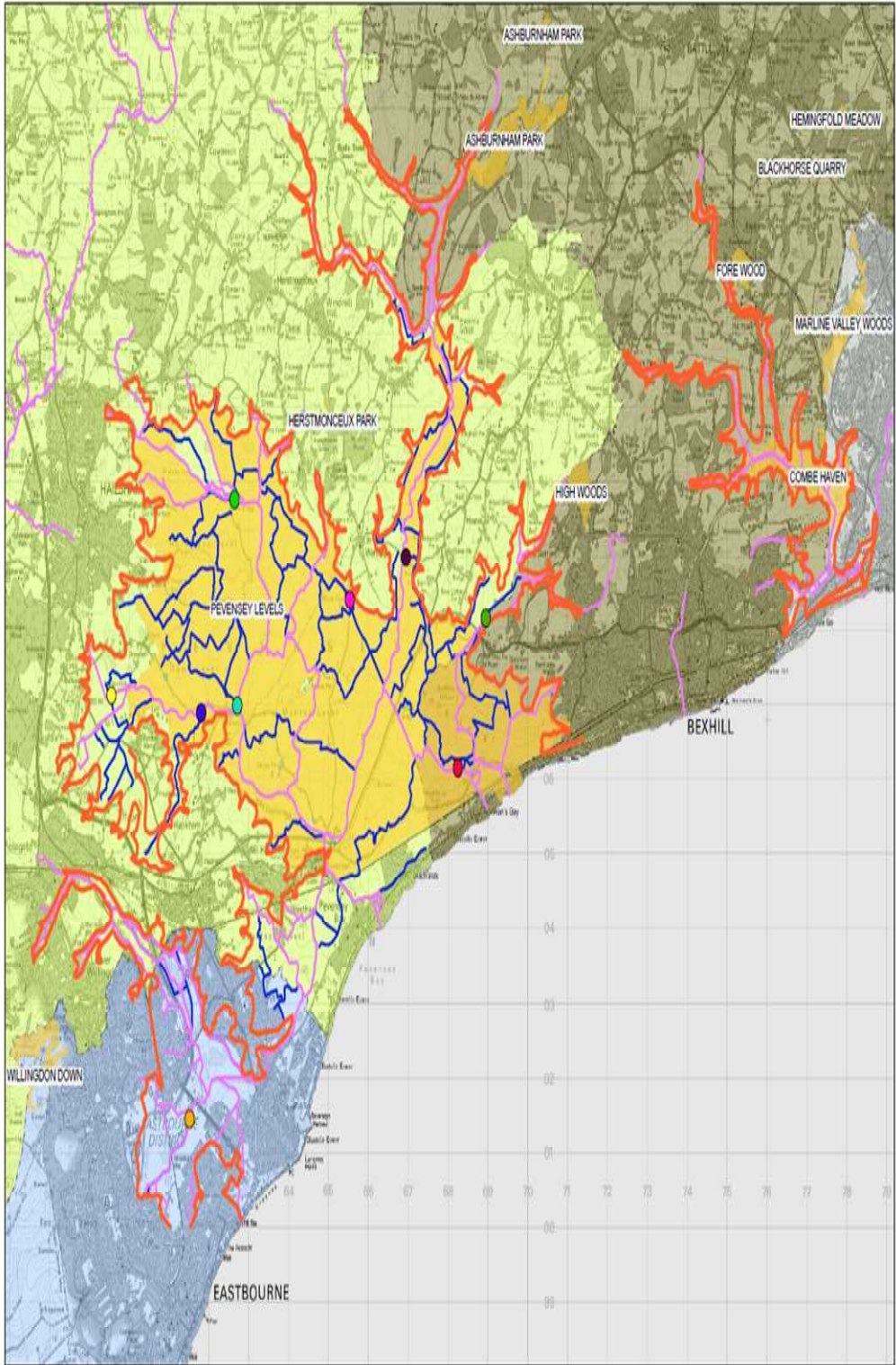


Legend

- | | | |
|--------------------------|----------------|-----------------------------------|
| Ouse IDD | New Water | Low Water |
| Backloggs Main Pump | U3 Watercourse | Mid Sussex District |
| Spring (Buckingham Road) | U3 Watercourse | The City of Brighton and Hove (M) |
| Devon Main Well | U3 Watercourse | Brighton & Hove (M) |
| Chapel | U3 Watercourse | Brighton & Hove (M) |
| Raxcombe | U3 Watercourse | Brighton & Hove (M) |
| Zedwell | U3 Watercourse | Brighton & Hove (M) |
| Raxcombe | U3 Watercourse | Brighton & Hove (M) |



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Pevensey IDD

Legend

Pumping Stations

- Bamhom
- Drockmill
- Honeycrook
- Horsebridge
- Lotbridge (Main River)
- Manvey
- Newbridge
- Rickney
- Star Inn

— Pevensey IDD Boundary

— Main River

— IDB Watercourse

SSSI

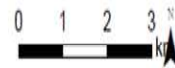
Local Authority

Eastbourne District (B)

Hastings District (B)

Rother District

Wealden District



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COMMITTEE	CABINET
DATE	10 December 2014
SUBJECT	Employment Land Local Plan
REPORT OF	Senior Head of Development

Ward(s)	All
Purpose	For Members to approve the Proposed Submission Employment Land Local Plan for publication for an 8 week period to receive representations on issues of soundness, in preparation for formal submission to the Secretary of State.
Contact	Matt Hitchen, Specialist Advisor (Planning) 1 Grove Road, Eastbourne Tel no: (01323) 415253 E-mail: matt.hitchen@eastbourne.gov.uk
Recommendations	<ol style="list-style-type: none">1. That Cabinet approve the Proposed Submission Employment Land Local Plan for publication for an eight week period to receive representations on issues of soundness.2. To delegate authority to the Senior Head of Development in consultation with the Lead Cabinet Member to make minor amendments before the commencement of the representation period.3. That following the end of the representation period, to delegate to the Senior Head of Development in consultation with the Local Plan Steering Group, authority to submit the Employment Land Local Plan to the Secretary of State for public examination.

1.0 Introduction

- 1.1 In May 2012, the Eastbourne Core Strategy Local Plan was subject to Public Examination by a Planning Inspector. The Inspector expressed concerns over the evidence that supported Core Strategy Policy D2: Economy, particularly relating to the employment land supply. In order to

address this issue without delaying the adoption of the Core Strategy, the Inspector recommended that Core Strategy Policy D2: Economy be the subject of an early review, leading to its replacement with an additional Local Plan to deal specifically with the employment land supply.

- 1.2 In order to meet this requirement, an Employment Land Local Plan (ELLP) is being produced. The ELLP will guide job growth and economic development in Eastbourne up to 2027 by identifying an appropriate supply of land for future employment development, in order to achieve a sustainable economy and make Eastbourne a town where people want to live and work. It specifically relates to land and buildings within the B1 (Offices and Light Industry), B2 (General Industry) and B8 (Storage and Distribution) Use Classes.
- 1.3 As Members will recall, a Proposed Draft ELLP was presented to Cabinet on 14 December 2013 for approval and authority to consult. It was subsequently published for a 12 week public consultation with the community and stakeholders between 20 December 2013 and 14 March 2014. The representations received during the consultation have been taken into account in revising the ELLP.
- 1.4 In order to progress the ELLP toward adoption, a Proposed Submission version now needs to be published to allow for representations to be made on issues of soundness.

2.0 Employment Land Local Plan

- 2.1 The evidence supporting the ELLP shows that there is a requirement to provide 43,000 sqm of employment (Class B) floorspace between 2012 and 2027. This would result in the creation of 1,263 new jobs.
- 2.2 In order to deliver the employment floorspace requirement, the ELLP proposes the intensification of land within the existing Industrial Estates to provide 20,000sqm of industrial and warehouse space, and the development of new office space in the Town Centre (3,000sqm) and Sovereign Harbour (20,000sqm).

3.0 Representations on Proposed Draft ELLP

- 3.1 A total of 30 representations were received from 10 organisations during the consultation on the Proposed Draft ELLP.
- 3.2 There were five main issues raised through consultation:
 - The amount of office space allocated in Town Centre

- The viability of employment development at Sovereign Harbour
- The density assumptions used to calculate how much floorspace will be required
- Protection of existing employment sites and restrictions on non-employment development within Industrial Estates
- The non-allocation of land north west of Hammonds Drive off Lottbridge Drove for employment development

3.3 Additional evidence has been prepared in order to take account of these representations and provide further information as to whether or not changes are required to the ELLP. This additional evidence has backed up the original position, and there will be no fundamental changes to the ELLP as a result of these representations.

3.4 A summary of representations and the full responses to those representations is provided in Appendix 1.

4.0 Amendments made to the ELLP

4.1 As the evidence supports the original position, there are few recommended changes to the ELLP. There are some minor amendments to various parts of the ELLP for clarification purposes.

4.2 A schedule of changes made to the Employment Land Local Plan is provided in Appendix 2.

5.0 Consultation

5.1 The Proposed Submission ELLP and its associated documentation was presented and approved by the Local Plan Steering Group on 23 September 2014.

5.2 The Proposed Submission ELLP will, if approved by Cabinet, be subject to an 8 week representation period between 12 December 2014 and 6 February 2015 to allow stakeholders to make representations on issues of soundness. Soundness is defined in the National Planning Policy Framework as being: positively prepared, justified, effective and consistent with national policy.

5.3 Public consultation will take place via the usual methods and will be in compliance with the Statement of Community Involvement. Representations can be made electronically via the Council's on-line consultation portal. A Statement of Representations Procedure, which is

required by Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012, is provided as a background paper.

6.0 Next Steps

- 6.1 Following the representation period, it is recommended that the Local Plan Steering Group consider a summary of representations and the need for further changes, and that the Senior Head of Development is given delegated authority to approve the submission of the ELLP to the Secretary of State ahead of public examination by a Planning Inspector. It is anticipated that this will take place around May/June 2015. If found sound at examination, the ELLP can be formally adopted by the Council.

7.0 Resource Implications

7.1 Legal Implications

- 7.1.1 The Proposed Submission ELLP has been prepared in order to meet Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012.

7.2 Financial Implications

- 7.2.1 There are no financial implications to the Council as a direct result of this report. The cost of the publication and publicity for the ELLP will be met from within the service budget which has been subject to bids through the Service and Financial Planning process.

7.3 Human Resource Implications

- 7.3.1 Officers in the Customer First team will manage the consultation arrangements for the ELLP, and the collection and processing of representations received.

7.4 Equalities and Fairness Implications

- 7.4.1 An Equalities and Fairness Impact Assessment was undertaken during the scoping stage in the production of the ELLP, and the assessment demonstrates that the ELLP is unlikely to have any significant impacts on equalities and fairness.

8.0 Conclusion

- 8.1 As a result of representations received during the consultation on the

Proposed Draft Employment Land Local Plan, some minor amendments have been made.

- 8.2 In order to progress the Employment Land Local Plan towards adoption, Cabinet are requested to approve the Proposed Submission ELLP for publication to receive representations on issues of soundness between 12 December 2014 and 6 February 2015.
- 8.3 Following the representation period, the Employment Land Local Plan will be submitted to the Secretary of State for public examination, following which the Council will be able to formally adopt the Employment Land Local Plan.

Background Papers:

- Proposed Submission version of Employment Land Local Plan (October 2014)
- Employment Land Local Plan Proposed Submission Sustainability Appraisal Report (November 2014)
- Schedule of Changes to the Employment Land Local Plan (Proposed Submission) (October 2014)
- Representation Statement (September 2014)
- Statement of Representations Procedure (September 2014)
- Employment Land Local Plan – Changes to Policies Map (September 2014)

To inspect or obtain copies of the background paper, please refer to the contact officer listed above.

APPENDIX 1

Responses to Representations

The table below provides a response to the representations receive during the public consultation on the Proposed Draft Employment Land Local Plan between 14 December 2013 and 14 March 2014, and identifies changes that should be made to the Proposed Submission version of the Employment Land Local Plan as a result.

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
PD-ELLP/02	Marine Management Organisation (Angela Atkinson)	General	No comments	No comment	No change to ELLP
PD-ELLP/03	Richard Maile	Employment Land Strategy and Distribution Scenario 1	<p>All of the industrial sites have the same flood risk from tidal flooding as the whole of Eastbourne. Therefore, there is no advantage in terms of flood risk.</p> <p>The major disadvantage is the uncertainty arising from what is basically a windfall site scenario. This is totally contrary to Government policy that seeks certainty in the planning system, particularly in terms of the provision of sites for employment.</p> <p>The figure of 20,000m² based upon the intensification of existing sites is totally unrealistic. Furthermore, it represents almost half of the total allocation of 43,000m².</p> <p>The disadvantages in Table 3 fail to highlight the enormous problems that are likely to be caused by increased traffic in heavily used areas, loss of car parking and other open spaces and, in particular, the fact that such intensification may well rely upon existing businesses having to move out to facilitate redevelopment.</p>	<p>The industrial estates are in tidal flood zone 3a, so reference will be included as a disadvantage. However, they are sites that have already been developed, and flooding infrastructure is already in place, which would still need to be provided on greenfield sites.</p> <p>It is considered that the Industrial Estates can accommodate 20,000sqm through the redevelopment and intensification of existing sites. Evidence of windfall delivery over recent years shows that the</p>	<p>No change to ELLP.</p> <p>Include reference to 'flooding' in disadvantages in the Employment Land Strategy and Distributions Options Report</p>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				<p>requirement can be delivered within the Industrial Estates. In addition, the Inspector at the Core Strategy examination accepted that a higher amount of floorspace than proposed in the ELLP could be provided within the industrial estates through intensification.</p> <p>The requirement includes an allowance for churn, to facilitate existing businesses moving out to allow redevelopment.</p>	
		Scenario 2	<p><u>Scenario 2: Extensions to Industrial Estates</u></p> <p>This scenario has been rejected as a preferred option. However, it is still an option and I would ask the appointed Inspector to consider it as such.</p> <p>A number of individual sites are involved, certain of which may have some of the disadvantages set out in Table 3. It is necessary to incorporate a policy within the Employment Land Local Plan to allow for the possibility of some extensions to industrial estates where these would produce benefits such as improved access, relationship with existing adjacent employment areas, enhanced visual and environmental benefits and the possibility of immediate development.</p> <p>In particular, I have had numerous approaches from developers; a fact that will be borne out by my agents,</p>	<p>The site in question was assessed during the examination on the Core Strategy as an omission site. In her report, the Inspector was satisfied that none of the omission sites were suitable for housing or employment development.</p> <p>The site is a greenfield site within the boundary of Eastbourne Park, and any development within this area would be contrary to Core Strategy</p>	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			<p>Messrs Ross & Co, together also with Sussex Police Authority who wishes to expand onto the site, their Custody Suite being located next door.</p> <p>Development of this site could also bring with it highway benefits in providing part of the access for the St Anthony's Link and environmental benefits in terms of bunding and landscaping to enhance the visual entry southeast along Lottbridge Drove, which is the main A22.</p> <p>The provision of the St Anthony's Link could also bring with it benefits in terms of the viability in the longer term of the sites at Sovereign Harbour.</p> <p>Although nominally part of Eastbourne Park, this land has for some 40 years been allocated as the Southbourne Link into town. Accordingly, it has never during that time been available as part of the open areas of the Park.</p>	<p>Policy D11: Eastbourne Park. Being in Eastbourne Park, the site has considerable biodiversity and the development of this site could have significant environmental impacts.</p> <p>It is considered that the requirement for industrial and warehouse development can be met through redevelopment and intensification within the existing industrial estates, and therefore there is no need to allocate additional greenfield sites for development, especially considering that development of this site would be contrary to existing policy in the Core Strategy.</p>	
		Scenario 3	<p><u>Scenario 3: Redevelopment of Sites Outside Industrial Estates</u></p> <p>I agree that redevelopment of sites outside industrial estates located in other areas of the town could bring about the disadvantages set out in the document. Furthermore, such redevelopment would possibly only be suitable for B1 uses. It is also a fact that many of the smaller industrial estates have in recent years been</p>	Comments noted.	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			lost to employment in terms of their redevelopment for residential purposes or for A1 retail.		
		Scenario 4	<p><u>Scenario 4: Town Centre</u></p> <p>This allocation represents only 3,000m2. Furthermore, it is not suitable for other non-office B class uses. Therefore it is of a very restricted application, again contrary to the need set out in the NPPF for a variety of allocations.</p>	There is a requirement for office space as part of the overall requirement for employment land. The Town Centre is an option as a location for employment development in the form of offices, and is part of the preferred option which does provide a variety of allocations for employment development.	No change to ELLP
		Scenario 5	<p><u>Scenario 5: Sovereign Harbour</u></p> <p>These sites are liable to the same flooding constraints as the land at Lottbridge Drove, a factor not mentioned in the disadvantages.</p> <p>Furthermore, this site, amounting again to almost half the allocation, has been on the market for over 20 years I understand with no takers. It is in a very peripheral location. Access to it is likely to increase the existing congestion in Lottbridge Drove and it cannot sensibly be considered as a short term provider of employment opportunities given the need to provide the St Anthony's Link, which I note is shown as a low priority. Furthermore, in terms of sustainability it is almost certainly subject to access by private car given its isolated location.</p> <p>My understanding is that there have been recent planning applications submitted, which if approved may</p>	<p>Sovereign Harbour is within tidal flood zone 3a, so reference will be included as a disadvantage.</p> <p>There have been recent applications approved for the development of employment uses on the Sovereign Harbour sites, including the development of an Innovation Mall, which is currently under construction. This would not compromise the ability of the sites at Sovereign Harbour to meet the requirement for</p>	<p>No change to ELLP.</p> <p>Include reference to 'flooding' in disadvantages in the Employment Land Strategy and Distributions Options Report</p>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			well render this particular allocation obsolete in terms of the overall floor area of 20,000m2. I would also mention that a number of companies interested in developing on my site in Lottbridge Drove have totally rejected going to Sovereign Harbour given its isolation and lack of other business uses.	20,000sqm of employment floorspace. Therefore this option should continue to form part of the preferred option for location of employment development in the town.	
		Scenario 6	<u>Scenario 6: Greenfield Development</u> I agree that the development of previously undeveloped greenfield land located away from the existing industrial estates is not a good option and should only follow if all else fails. However, my comments in respect of Scenario 6 should not be seen as precluding development of the site adjacent to Hammonds Drive, which falls to be considered under Scenario 2.	Comments noted.	No change to ELLP
PD-ELLP/04	Gardners Books Ltd (Andrew Little)	Employment Land Strategy and Distribution	Support for the Preferred Option for distribution of employment land. Against any development of Eastbourne Park (Scenario 6) as building on this land would be detrimental to the character of the town and it contributes to making Eastbourne a desirable and unique location to live. Need to cater for larger office/industrial units as there is a shortage of this type of accommodation. Disappointed that industrial land had previously been released for retail development.	Comments noted. Scenario 6 has not been taken forward and there will not be any development proposals in Eastbourne Park as part of the Employment Land Local Plan. It is understood that there is a shortage of larger accommodation, and it is anticipated that this can be provided as part of the development	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				<p>of the Sovereign Harbour sites. In addition, the protection of sites in industrial estates will encourage redevelopment to provide better quality industrial floorspace.</p> <p>The loss of industrial floorspace to other uses including retail is an identified issue. The Employment Land Local Plan includes policies for the protection and safeguarding of existing employment space within the Industrial Estates.</p>	
PD-ELLP/05	Highways Agency (Keith Jacobs)	General	<p>The cumulative effect of development in the borough could have an impact on the A259 to the east, A27 to the north and more specifically the Cophall roundabout and A27/A2270 junction. It is important that, wherever possible, policies which encourage sustainable development will help reduce the likely impact on the SRN.</p> <p>No comment other than that described above and as stated in our consultation responses to the Core Strategy.</p>	<p>Comments noted.</p> <p>The Employment Land Local Plan proposes a lower quantum of development that previously proposed in the Core Strategy, and therefore it is not expected that there will be additional adverse impact on the Strategic Road Network.</p>	No change to ELLP
PD-ELLP/06	Sussex Police (Samantha Prior)	Employment Land Strategy and	Support for Scenario 1 as this option makes best use of existing Brownfield land, and includes the area of Hammonds Drive in which Sussex Police have a	Support noted.	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
		Distribution	particular interest due to the existing premises operated and land owned.		
		Policy EL2	<p>Inclusion of Sussex Police site in proposed Policy EL2 is welcomed.</p> <p>Concern that Policy EL2 only allows for the intensification, redevelopment or new build for Class B Use only (or appropriate uses that cannot be located elsewhere due to their un-neighbourliness), as Sussex Police operations fall within Class C2A and Policy EL2 may prohibit future police developments. Although there are no plans to increase this facility on site, some flexibility may be required over the thirteen year plan period.</p> <p>The ELR identifies that one of the weaknesses of Hammonds Drive is access. Policy EL2 does not take the opportunity available for improving the approach, parking demarcation and public realm within the Estate.</p>	<p>It is necessary to protect the Industrial Estates from other uses in order to protect their integrity and so that they remain locations where there is an expectation that businesses would be located. However, Policy EL2 does allow appropriate uses that cannot be located elsewhere due to its un-neighbourliness and it is considered that a Police Custody Centre would be such a use due to the fact that it is used 24 hours a day, which could cause disturbance in a residential area.</p> <p>The Core Strategy Neighbourhood Policy C13 addresses the issue of public realm in the Industrial Estates by 'promoting the upgrading public realm in the Industrial Estates to make it more attractive for potential and existing businesses'. It is not</p>	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				considered necessary for this to be repeated in the ELLP.	
PD-ELLP/08	Natural England (John Lister)	General	The designated Industrial Sites shown in Figure 1 - lie to the north and south of part of Eastbourne Park. This is Coastal & Floodplain Grazing Marsh and a significant part of this area is supported by Environmental Stewardship funded through NE. The Park is a key component in the habitat network and an amenity for the town. The Plan (as a whole) should ensure that intensification of the Industrial Sites does not have a detrimental impact this important asset.	Comment noted. The Core Strategy contains policies for the protection of Eastbourne Park, and the Employment Land Local Plan does not identify development in Eastbourne Park on this basis. It is not expected that intensification of the industrial estates will have an adverse impact on Eastbourne Park, as development would not be accepted outside of the industrial estate boundary.	No change to ELLP
PD-ELLP/09	East Sussex County Council (Ellen Reith)	Introduction - Relationship with other plans and strategies	There is no reference to the EU Structural Investment Fund or the draft SELEP Strategic Economic Plan, although it is likely that Eastbourne would seek some of the funding for activities identified through these routes. Identifying the link in this strategy would also strengthen the case when making project applications.	Reference to the EU Structural Investment Fund and the SELEP Strategic Economic Plan will be made.	Add two new paras after para 1.14 to read: <i>The South East Local Enterprise Partnership (SELEP) Strategic Economic Plan sets out proposals to drive economic expansion over the next six years. The bid for the Government's Local Growth Fund is</i>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
					<p><i>supported by businesses, local authority and education leaders across the area. To date, funding has been awarded for the development of an Innovation Mall at Sovereign Harbour (via the Growing Places Fund), and transport schemes with committed funds from the Growth Deal for the 'Hailsham, Polegate and Eastbourne Sustainable Corridor' and an Eastbourne and South Wealden walking and cycling package.</i></p> <p><i>EU Structural Investment Funds 2014-20 will enable the SELEP to combine resources from both Europe and national government to deliver economic growth in the South East. Funding themes include improving employability, enterprise growth, business support, innovation, export and new technologies.</i></p>

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PD-ELLP/10	East Sussex County Council (Ellen Reith)	2.3	Where claims are made e.g. There is a strong concentration of employment within key parts of the 'media' sector, there should be a footnote reference to the source of the data. The document includes a number of claims about clusters and sectors in the county, but there are often few data references to back them up. It would be very helpful for cross-referral and also to identify sources of data.	The data is sourced from the Employment Land Review (GVA, 2013), and this will be referenced in the footnotes.	Include footnote references to data sources.
		2.14	Is there evidence of the need for additional business space of this type? If this type of investment is to be made, there should be some reference to how the need has been identified, or there is a risk of new-build standing empty.	The Employment Land Review (GVA, 2013) identifies that the lack of 'mixed' units is one of the weaknesses of the employment land supply in Eastbourne. It goes on to state that this stock is likely to be in demand by businesses in advanced manufacturing, media/creative and technology based sectors. The recent application for an Innovation Centre, which is currently under construction, is just this type of flexible, mixed accommodation and provides an indication that there could be further demand for this type of space in the future.	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
PD-ELLP/11	East Sussex County Council (Ellen Reith)	2.21	This should specify what specialisms and clusters are to be encouraged to grow and to build their supply chains. This will help a wider audience identify opportunities and can give a focus to others working on this agenda elsewhere.	The Employment Land Review (GVA, 2013) identifies strength in a number of manufacturing activities, particularly relate to mechanical products, and in parts of the 'media' sector in terms of film and TV production and production of recorded media.	Amend the final sentence of para 2.21 to state: <i>Also, by encouraging existing key businesses and their supply chains, there is an opportunity to grow existing specialisms and 'clusters'. This might include manufacturing activities, particularly related to mechanical products, and parts of the 'media' sector, such as film and TV production and production of recorded media, which are sectors that have been identified as being particularly strong in Eastbourne.</i>
		2.22	It is very unhelpful to put the statement ' ... Should no longer rely on attracting significant inward investment.' It sends the signal that Eastbourne is closing the door to inward investment, or at best will put little effort into it if an opportunity arises, focusing instead on home-grown business. It is also at odds with the fact that Eastbourne contributes to the funding for Locate East Sussex. Even if recently there has not been inward investment it does not automatically mean it will remain that way. As the economy edges out of recession, there should be more growth and opportunities for business mobility, so Eastbourne should be prepared for this and invite it in.	It was not the intention for the ELLP to close the door on inward investment, but to recognise that future demand is more likely to be driven from local business requirements. Increasing economic growth will require focusing on the strengths of existing businesses and attracting like-minded	Amend para 2.22 to read: <i>The nature of economic growth has changed over recent years and Eastbourne has seen lower levels of inward investment, mainly due to the age and quality of existing stock, and has instead been more reliant on local investment from indigenous businesses.</i>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				<p>new activities to the area. This will need to be done through the provision of new, higher quality floorspace, which will be key to providing choice and attracting inward investment.</p> <p>Para 2.22 will be amended to reflect this.</p>	<p><i>Future demand and growth in the market is still likely to be driven from local investment, either through expansion, changing space requirements or new business start ups. However, as the economy grows, it is important to encourage inward investment by making provision for attracting like-minded new activities to the area.</i></p> <p><i>The Employment Land Local Plan needs to ensure it provides the right space in the right locations for inward investment but also provide the range of sites and premises required to ensure existing businesses are retained and can grow. This will also include the provision of a range of sites, including new, high quality floorspace alongside sites and premises to help increase the business start-up and survival rate and ensure indigenous businesses are</i></p>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
					<i>retained and can grow.</i>
PD-ELLP/12	East Sussex County Council (Ellen Reith)	Key Issues	The improvements underway, both commercially and through the East Sussex investments in super-fast broadband should be included. Increasingly, premises with super-fast broadband connectivity are a requirement by businesses, (even if 'not mandatory for the delivery of employment land' - 5.4) aiming to grow and expand their markets, and should be highlighted here as well as later in the document.	Agreed. Broadband connectivity could influence demand for employment land and will be referenced as a demand issue.	Add additional sentence to end of para 2.20: <i>In addition, premises with super-fast broadband connectivity are a requirement for businesses aiming to grow and expand their markets, and improvements in broadband connectivity may influence the requirement for additional employment land in the area.</i>
PD-ELLP/13	East Sussex County Council (Ellen Reith)	2.30	The Employment Land Review should be footnoted with a link to ensure ease of access.	Comments noted.	Include link to ELR within footnote
		2.32	It would be helpful to give examples of the densities mentioned in the text - not all of the audience will be clear what these densities look like in practice, so a recognisable example for each one cited would aid understanding.	The density assumptions are derived from the HCA Density Guide Second Edition 2010. This is national good practice guidance. In addition, it would be very difficult to find examples that everyone would be familiar with.	No change to ELLP
PD-ELLP/14	East Sussex County Council	Vision and Objectives	'Eastbourne will be making a strong contribution to the economy of Eastbourne and South Wealden' is confusing - it is making a contribution to itself. It is	Agreed. The Vision could be re-worded to be less	Amend the Vision to read: <i>"By 2027, Eastbourne will</i>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
	(Ellen Reith)		suggested that this is changes to 'The Eastbourne economy will be stronger and more sustainable. It will also contribute to the wider economy in South Wealden by	confusing.	<i>be making a strong contribution to the sustainability of the local economy, not just in the town but also in south Wealden, by providing a range of business premises in sustainable locations and offering a range of job opportunities, making the town a place where people want to live and work"</i>
PD-ELLP/15	East Sussex County Council (Ellen Reith)	Vision and Objectives	<p>ELLP1 seems at odds with the comment about inward investment in paragraph 2.22. It is also unclear how attracting increased investment and new and innovative businesses encourages economic competitiveness. Generally, that would be more a result of efficiencies and comparative advantage.</p> <p>ELLP2 says largely the same as ELLP3. The title suggests start-up support, whereas the paragraph refers to both start-up and established businesses. It is suggested that the objective just says something about providing flexible employment spaces that meet the needs of and are attractive to small and start-up businesses.</p> <p>ELLP4 maybe be a bit more positive about what the new premises will enable, such as staying in the town and flourishing.</p>	<p>As described in the response to PD-ELLP/11, economic growth will rely on indigenous businesses as well as inward investment.</p> <p>Inward investment through attracting like-minded business activities will encourage the economic competitiveness of the local economy.</p> <p>Whilst there is an element of similarity between ELLP2 and ELLP3, the objectives are different. In order to reduce similarities, ELLP2 will be amended to removed</p>	<p>ELLP2 delete: 'To diversity the local economy...'</p> <p>Amend ELLP4 to read: 'ELLP4 - Support Existing Businesses - To support existing businesses in staying in the town by allowing them to relocate to premises in the town that better meet their needs and help them to flourish'.</p>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				reference to diversity. ELLP4 will be amended to refer to staying in the town and flourishing.	
PD-ELLP/16	East Sussex County Council (Ellen Reith)	Employment Land Strategy and Distribution	Yes, agree with assessment of the scenarios for the strategy and distribution.	Comments noted.	No change to ELLP
PD-ELLP/17	East Sussex County Council (Ellen Reith)	Employment Land Strategy and Distribution	Yes, agree with the preferred option.	Comments noted.	No change to ELLP
PD-ELLP/18	East Sussex County Council (Ellen Reith)	Page 19	The narrative on this page repeats what was set out clearly in the tables and does not add anything qualitative, so could be taken out to make the document more succinct.	The section on 'Options considered for employment land strategy and distribution' was only intended to aid understanding in the Proposed Draft version and will not be included in the Proposed Submission version.	No change to ELLP
		3.7	Clarify why occupiers are seeking to vacate: is it to relocate within the area, fold, or leave the area altogether?	There are a number of instances where the current premises do not meet the needs of the business. However, there is no indication as to where they will move to. It is important for the ELLP to recognise that	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				there will be movement within industrial estates.	
PD-ELLP/19	East Sussex County Council (Ellen Reith)	Employment Land Strategy and Distribution	Yes, agree with the proposed approach to the distribution of employment land.	Comments noted.	No change to ELLP
PD-ELLP/20	East Sussex County Council (Ellen Reith)	Policy EL1, bullet point 4	It would be helpful to specify specialisms.	Para 2.21 has been amended to refer to specific specialisms. It is not considered appropriate to include this reference in the policy, however the supporting text will be amended to specify the specialisms.	No change to ELLP
		3.11	Examples of similar successful schemes elsewhere in East Sussex should be given.	Agreed. Examples of other successful developments in East Sussex will be referenced.	Add sentence at end of para 3.11 to read: <i>Examples of this type of development in other parts of East Sussex include the Priory Quarter and North Queensway Innovation Park in Hastings, and the Basepoint Enterprise Centre in Newhaven.</i>
		3.12	Specify which sectors key businesses are in.	Instead of referring to specific specialisms in the Policy, it is more appropriate to do this in the support text, and para	Amend 3.12 to read: <i>Eastbourne should further the development of 'clusters', including but</i>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				3.12 will be amended to make this reference.	<i>not limited to mechanical manufacturing and film and TV production, by using existing key businesses and their supply chains as an opportunity to grow existing specialisms through promotion and provision of appropriate space. The role of these clusters should be enhanced in the Borough both as a 'selling point' to attract occupiers and through the development of links to suppliers locally.</i>
		3.15	Where it says 'Working with and enhancing', it should identify clearly what this means. Is it Eastbourne Borough Council or others as well?	Eastbourne Borough Council will work with education providers in order to enhance skills provision. Para 3.15 will be re-worded to make it clearer.	Amend final sentence of para 3.15 to read: <i>Eastbourne Borough Council will work with the existing education and skills institutions to enhance provision, in order to address skill shortages, increase the working age population and improve the 'economic catchment' of the Borough.</i>
PD-	East Sussex County Council	4.7	Are any bespoke builds intended here to help existing	The ELLP does not specify the type of	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
ELLP/21	(Ellen Reith)		businesses grow with minimum relocation?	redevelopment that should take place in the industrial estates, but it is envisaged that it will be a mix of bespoke and speculative developments.	
PD-ELLP/22	East Sussex County Council (Ellen Reith)	4.20	Clarify what sort of 'support will be given'. Does it mean planning permission, lobbying or funding, or something else?	'Support' refers to planning permission. The sentence will be re-worded for clarification.	Amend final sentence of 4.20 to read: <i>Therefore, proposals for the refurbishment of existing office stock within the Town Centre will be supported, to meet modern occupier demands where they come forward.</i>
PD-ELLP/23	East Sussex County Council (Ellen Reith)	Monitoring Framework	Information should be gathered not only on floor space completed, but also how much of it is occupied after 1 year, 3 years, 5 years, and how much remains vacant, to evaluate the success and value for money of the investments.	Whilst it is agreed that this information would help to evaluate success of development schemes, the occupation of the business units are not in the control of the planning system, and therefore it would not help with monitoring the effectiveness of the Employment Land Local Plan. In addition, Eastbourne Borough Council does not	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				have the resources to monitor of occupation as part of the monitoring of the Employment Land Local Plan.	
PD-ELLP/24	Teal Planning Ltd (Marie Nagy) On behalf of Sovereign Harbour Limited (Mark Orriss)	Evidence (<i>Employment Land Review</i>)	The ELR presents much of the technical assessment data in summary form only. It would benefit from the addition of primary and analytical data tables within an appendix to trace the steps taken through to the recommended level of floorspace to be provided. Some inconsistencies appear within some of the ELR's summary tables and text (e.g. ELR Tables 3 and 4). The document should be reviewed to ensure these are corrected.	The Employment Land Review (ELR) will be reviewed and amended to ensure consistency between data tables and commentary text. Where relevant we will provide supporting data tables in an appendix to the main report.	No change to ELLP The ELR will be reviewed and amended to include technical data and ensure consistency between text and tables.
			Reference is made within various of the ELLP documents to the proposed Innovation Mall at Sovereign Harbour providing 3,000sq.m. of B1 space. The detailed planning application for the Mall is for 2,300sq.m. accommodating c.300 jobs. This equates to a density of c.8sq.m. per job, which accords with HCA published guidance on floorspace to job densities for serviced space. The ELR's application of 12sq.m. per office job across town centre and business park sites represents an over-specification of any such allocated space at Sovereign Harbour, as already demonstrated by the Mall. This should be reduced to 8-10sq.m. for assessment purposes.	The density of 12 sqm is in line with the nationally recognised HCA's Density Guide Second Edition (2010). The average office density across the South East region is 12.7 sqm per office job. Only within Central London are densities of 8-10 sqm per office job regularly achieved. Average densities for the sectors most relevant to Eastbourne indicate that 12 sqm is appropriate, and therefore 12 sqm per office job will continue to	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				be used as occupier density.	
			<p>The ELR refers to the TCLP envisaging that 3,000sq.m. of new office space will be allocated to Eastbourne town centre (ELR para 4.88). The TCLP does not envisage this. The requirement for the early review of the CSLP and the examination of the TCLP both emphasised the purpose of the ELLP is to independently determine the level of new floorspace requirements and how these can be most appropriately met across the town.</p> <p>The linked SA/SEA (para 6.10) repeats this error and has not considered all reasonable alternative spatial options for the distribution of new employment space. It demonstrates the consideration of just one strategic option for office space within the town centre: this being the continued allocation of just 3,000sq.m. A higher allocation within the town centre is a reasonable, market-led and NPPF policy compliant alternative.</p> <p>The allocation of just 3,000sqm. to the town centre will not replace the ELR's assessed windfall loss of 4,000sq.m. of office space to other uses, which will predominately take place within the town centre. The proposed allocation of new office space to the town centre thereby represents a planned for net loss of office space within the centre when both forecast losses and allocated new space are accounted for.</p> <p>Capacity exists for the office allocation within the town centre to be significantly increased without compromising other spatial objectives, including the provision of new housing. This includes within the two sites that are specifically identified in the ELLP to accommodate the 3,000sq.m. of allocated space. Whilst</p>	<p>90% of the office stock in Eastbourne is located in the Town Centre. Office occupiers have different requirements, and currently Eastbourne does not provide sufficient choice with the majority of office space provided in the town centre. A more balanced provision of town centre and out of town locations is required to secure economic growth.</p> <p>It is considered that the provision of 3,000 sqm of new office space in the town centre will allow the replacement of some of the old stock that no longer meets the needs of occupiers, whilst also allowing the rebalancing of the portfolio.</p> <p>It is not agreed that there is capacity in the Town Centre for significantly increased office provision without compromising other objectives for the</p>	<p>No change to the ELLP</p> <p>Increased office provision to be tested as part of the Sustainability Appraisal</p>

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			<p>the EBC documents do not appraise the total upper floorspace capacity of these sites, it is nonetheless acknowledged through ELLP Policy EL3 that they can individually as well as together accommodate more than 3,000sq.m. of office accommodation.</p> <p>The ELLP acknowledges the strength and strategic benefits of the Eastbourne/Polegate/Hailsham corridor but does not propose any further formal allocation of office space within the Eastbourne area of the corridor beyond just 3,000sq.m. in the town centre. The corridor is a key establish commercial hub and in connectivity terms benefits from existing infrastructure including rail connections. Potential exists to capitalise on this further including for office space. This must be recognised in policy.</p> <p>The assessed requirement of just under 21,000sq.m. of Class B1a/b space must be rebalanced to require the majority of this to be provided within the town centre alongside (1) opportunities for additional provision within the town's other centre and along the strategic corridor to Polegate, and (2) the possibility of grant supported space at the Harbour.</p> <p>This distribution will ensure office accommodation is replaced and enhanced within the town centre and will follow the logical pattern of established growth and connectivity within Eastbourne and adjoining Wealden.</p> <p>The SA/SEA's appraisal of the Council's preferred spatial options exaggerates the sustainability benefits of the ELLP's proposed balance of office space allocations. The reassessment of these and of the alternative option to allocate a higher amount of space to the town centre, accounting for potential subsidised new space at the Harbour, demonstrates this to be by</p>	<p>Town Centre. The Town Centre Local Plan identifies five development sites, two of which already have permission. The remaining three sites will be required to deliver the office space requirement, 450 residential units, along with additional retail and community uses. It is not considered that an increased provision of office space could be appropriated provided alongside the other requirements on these sites.</p> <p>However, an increase level of provision of office space in the Town Centre will be tested as part of the Sustainability Appraisal.</p> <p>It is not considered appropriate that the majority of the office space requirement should be provided in the town centre.</p>	

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			<p>far the more beneficial option. This is in overall delivery and sustainability terms and in terms of being able to achieve the objectives and vision of the ELLP overall. This alternative option is also SEA regulation and NPPF compliant.</p>		
			<p>The ELR acknowledges the longstanding viability constraints for Class B1 space at the Harbour. It however goes on to recommend that no less than 96% of the town's total assessed office floorspace requirement (20,766sq.m) and 100% of the assessed net new floorspace requirement (15,977sq.m.) should be allocated here. This does not represent an appropriate balance in the distribution of new and replacement office space and will not achieve the vision or the core objectives of the NPPF, CSLP or of the ELLP.</p> <p>Critically, the ELR/ELLP's proposed allocation at the Harbour is also unviable in commercial terms. The ELR acknowledges the need for grant funding support to overcome viability constraints for high quality office development at the Harbour. The Site 6 B1 proposals that are progressing through planning at the time of writing are only proposed with the support of grant aid. That support will not apply to all of the proposed employment land. Acknowledged longstanding viability constraints that have sterilised the employment sites at the Harbour will therefore not only remain on Sites 4 and 7 but will be exacerbated further by the presence of adjoining subsidised provision, against which Sites 4 and 7 will be unable to compete in financial terms. A continuing policy allocation for further substantial open market B1 space at the Harbour will, in short, be undeliverable.</p>	<p>It is established practice for public funded employment space to 'lead' or support new commercial districts as it allows for future delivery on 'market terms', provides proof that there is a market for such development and helps establish new sectors.</p> <p>The Innovation Mall can play an important role in demonstrating the potential of Sovereign Harbour as a new economic hub. The provision of publicly subsidised space has been a key tool in a number of locations to support wider, private sector, employment development. Examples of this are locations such as Silverstone and the Medway Innovation Centre. It is not considered that the</p>	<p>No change to ELLP</p>

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				subsidised provision on Site 6 will have any negative impact of the viability of the remaining sites.	
PD-ELLP/25	Teal Planning Ltd (Marie Nagy) On behalf of Sovereign Harbour Limited (Mark Orriss)	Demand Issues	<p><i>Requirement for additional employment land:</i> the summary explanation on this matter is supported, in particular the need to provide for an appropriate and realistic employment land requirement, differentiated by B Use Classes.</p> <p>The assessment of floorspace and resulting land requirements, must accordingly take into account the nature of Eastbourne's employment market, including its small scale and local origin of demand for space.</p> <p>Having reviewed the new ELR, however, we do not consider the resulting recommended requirements for the level and distribution of new office space have been fully substantiated.</p>	The ELR provides a full justification for the employment land requirements, including the forecast for the number of jobs that need to be provided by use class, and appropriate densities to turn the job requirements into floorspace requirements.	No change to ELLP
			<p><i>Need for sustainable job creation and diversification:</i> The need to diversify local employment and to ensure that new local job creation is sustainable is supported.</p> <p>The definition of sustainable employment must be clearly defined if this is to appropriately and objectively inform employment land allocation options and choices. We consider the definition in relation to Class B1a/b space should be new employment that:</p> <ul style="list-style-type: none"> • becomes established and continues to provide job opportunities for local people over the long term; and • is located where it is most accessible by the greatest number of people without their need to 	<p>The ELLP does not reference the term 'sustainable employment' and therefore there is no need to provide a definition for it.</p> <p>Within the Initial Sustainability Appraisal Report, Sustainability Objective EL-SA13 relates to providing employment opportunities that are in accessible locations for local people and commuters, Sustainability</p>	No change to ELLP

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			<p>travel by private car.</p> <p>This second requirement underpins significant elements of nationally accepted strategic and sustainable planning objectives but does not sufficiently underpin the draft ELLP and its linked SA/SEA. This follows from weaknesses within the ELLP and its supporting documents in the weighing up of the respective location benefits of the town centre and Sovereign Harbour.</p> <p>The Response Statement includes a reassessment of the ELLP's proposed distribution of new office space based upon the SA/SEA assessment criteria.</p> <p>An alternative allocation option, with more office space directed to the town centre, has also been appraised and is shown to score more highly in sustainability terms.</p>	<p>Objective CS7 mentions accessibility by sustainable modes of transport, and Sustainability Objective CS20 references reducing the need to travel by car.</p> <p>It is considered that this adequate deals with the assessment of sustainability in terms of accessibility.</p>	
			<p><i>Development that provides for start-up businesses:</i> This is also supported. The proposed Innovation Mall at Sovereign Harbour will help to meet this objective.</p> <p>The Innovation Mall will however provide 2,300sq.m. of space not 3,000sq.m. as referenced in the ELLP (para 4.36). The planning application for the Mall has also specified that it envisages it will accommodate 300 jobs. This equates to a floorspace to job density of 7.7sq.m.; a density that is in line with the HCA's 2010 guidance on serviced office space, but significantly lower than the 12sq.m. used within the ELLP's accompanying ELR to appraise floorspace requirements.</p> <p>As outlined within the Response Statement, the ELR's applied job density results in an over-allocation of office space. A density of 8 to 10sq.m. per job is appropriate</p>	<p>Reference within background documents to 3,000 sqm at the Innovation Mall will be amended to 2,300 sqm NIA</p> <p>The density of 12 sqm is in line with the nationally recognised HCA's Density Guide Second Edition (2010). The average office density across the South East region is 12.7 sqm per office job. Only within Central London are densities of 8-10 sqm per office job regularly</p>	<p>No change to ELLP</p> <p>Reference to 3,000 sqm at the Innovation Mall will be amended to 2,300 sqm NIA.</p>

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			for such space at the Harbour.	achieved. Average densities for the sectors most relevant to Eastbourne indicate that 12 sqm is appropriate, and therefore 12 sqm per office job will continue to be used as occupier density.	
		Supply Issues	<p><i>Suitability of Current Commercial Premises:</i> The draft ELLP on this matter refers only to examples of the town's Industrial Estates as providing opportunities to be upgraded or replaced to provide more appropriate modern accommodation.</p> <p>The town's existing office stock presents the same challenges but also opportunities. This must also be acknowledged and addressed more positively by the ELLP if the necessary links are to be made between:</p> <p>(1) the nature of the town's office market; and</p> <p>(2) a need to ensure employers have an on-going and increased opportunity to locate in the town centre as Eastbourne's established and most sustainable office location.</p>	The 'Suitability of Current Commercial Premises' will be amended to include reference to office stock. The ELR identifies that much of the office stock is no longer fit for purpose and does not provide an attractive offer to new occupiers. This is evidenced by the persistent high vacancy rates in a number of buildings and increasing demand for conversion to other uses.	Add additional text at end of para 2.23: Similarly, a significant amount of the office stock, especially in the town centre, is dated and does not tend to meet the needs of modern office occupiers. In many cases refurbishment is not possible to create "Grade A" space as floor to ceiling heights are not sufficient to allow modern servicing and infrastructure to be incorporated.
			<p><i>Loss of Employment Land to Other Uses:</i> The acknowledgement of this issue is supported. At present however the ELLP appears to too readily accept the loss of employment space within the town centre because higher value use options may be available. Planning policy allocations and linked planning controls must seek to maintain existing employment based</p>	It is appropriate to consider the loss of employment land to other uses, especially in the town centre, because of permitted development rights that allow	No change to ELLP

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			<p>accommodation where it is already appropriately located to help meet space requirements.</p> <p>This requires a more positive policy response towards the retention and provision of office space, across a greater number of sites and to a higher level of floorspace capacity within the town centre than is currently proposed within the draft ELLP.</p>	<p>conversion of office space to residential (subject to prior approval), and para 51 of the NPPF, which sets the principle of allowing change of use from B space to residential use. The most appropriate employment space for conversion to residential is located within the town centre. Policy EL2 has been included in the ELLP to maintain existing employment based accommodation in the most appropriate locations.</p>	
			<p><i>Identification of Sites:</i> The ELLP's stated need to ensure that additional employment development is provided in the most appropriate and sustainable locations is supported.</p> <p>The draft ELLP however is too negative in its assessment of development constraints and its options for new office space within the town centre and too readily dismisses this option in favour of other potentially higher value uses.</p> <p>The need to ensure an appropriate supply of office space within the town centre must take greater precedence than is currently expressed within the draft ELLP.</p> <p>The ELLP additionally assumes in space allocation terms</p>	<p>Support for the identification of sites is noted.</p> <p>It is not considered that the draft ELLP is too negative in the assessment of the town centre, and it does take into account occupier needs for a more balance provision of office stock.</p> <p>However, an increase level of provision of office space in the Town Centre</p>	<p>No change to ELLP</p> <p>Increased office provision to be tested as part of the Sustainability Appraisal</p>

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			<p>that no new office space will be provided within the town's existing employment estates. New office accommodation has been provided in these locations and opportunities to provide further such accommodation should not be dismissed.</p>	<p>will be tested as part of the Sustainability Appraisal.</p>	
			<p><i>Requirements for Office Space in the Town Centre:</i> The ELLP refers to both the EBC TCLP (2013) and the SA/SEA as stating that the ELLP is to determine the appropriate amount of office space to be provided in the town centre. The ELLP's summary of this issue also states that a balance must be struck which must take into account the maintenance of the town centre as an office location as well as the broadening of choice within the town's overall office stock.</p> <p>At para 4.88 of the supporting ELR however GVA states: Across a range of Development Opportunity Sites, Transition Areas and Potential Areas of Change B1a floorspace is deemed an acceptable use.</p> <p>It is within these areas that the TCLP envisages the delivery of 3,000sq.m. of new floorspace within come forward.</p> <p>The TCLP does not envisage this; the TCLP requires the ELLP, supported by a sound evidence base (i.e. the new ELR), to establish an appropriate allocation of net additional new space for the town centre. At no point does the ELR explain how the allocation of this amount of space has been re-arrived at or why it is limited to just 3,000sq.m.</p> <p>At page 8 within the Executive Summary of the ELR, GVA states: To avoid any adverse impact on the town centre we would continue to support the 3,000sq.m. allocation within the Core Strategy with a primary focus</p>	<p>The NPPF sets the direction for LPAs to identify strategic sites (or set criteria to identify them) for local and inward investment to meet "anticipated needs over the plan period". In line with paras 7 and 17 the distribution of development land for business should have the right types of land available in the right places at the right time to meet occupier requirements, it should also respond to market signals.</p> <p>The review of Development Opportunity Sites within the ELR identifies the 'hierarchy' of potential sites in the town centre for office use based on a market orientated view of their attractiveness. None of the sites are ruled out,</p>	<p>No change to ELLP</p> <p>Increased office provision to be tested as part of the Sustainability Appraisal</p>

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			<p>for delivery on the sites Development Opportunity Site 2 and Development Opportunity Site 3.</p> <p>Whilst the ELR at its Table 15 (pages 49 to 52) appraises the TCLP Development Opportunity Sites (DOS) and town centre Transition Areas for their suitability for new office accommodation, as explained within the Response Statement, elements of this assessment are flawed and the link between the capacity of these sites and the allocation of 3,000sqm is again not explained.</p> <p>An allocation of 3,000sq.m. equates to just one building within one block of DOS Three.</p> <p>The ELLP at para 4.26 also acknowledges that DOSs Two and Three have capacity to accommodate more than 3,000sq.m. both individually as well as together, It states that: If one site comes forward without sufficient provision of office space, the balance should be provided on the other.</p> <p>Following from this, the ELR fails to appropriately appraise the overall market risks and threats that arise from proposing such a limited amount of office space within the town centre and does not fully consider the sustainability issues arising from the balance of allocations proposed within the centre and at Sovereign Harbour.</p> <p>As outlined within the accompanying Response Statement, the SA/SEA's appraisal of the ELLP's single option for the town centre of 3,000sq.m. of B1 space is flawed. The Statement accordingly reappraises the distribution of space options:</p> <ul style="list-style-type: none"> • first based upon what we consider a more appropriate scoring of EBC's proposed option 	<p>but it suggest those that are likely to be most appropriate and attractive to the market. In line with the direction of the NPPF, office proposals, should they come forward on any site, will be assessed in the usual development control manner for acceptable town centre uses. The identification of the DOS 2 and 3 is intended to provide a strategic direction for promotion of town centre opportunities. The availability of other development sites does not evidence a reduction in the need for other types of site across the Borough to meet local economic needs.</p> <p>The majority of the office stock in Eastbourne is located in the Town Centre. This does not meet occupier needs, and therefore it is necessary to rebalance the portfolio is include provision in out of town locations. Provision in the town centre will be high quality</p>	

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			<p>against the ELLP's sustainability objectives; and</p> <ul style="list-style-type: none"> second based upon an alternative option which demonstrates that a higher office allocation for the town centre presents a more favourable approach in sustainable planning terms, one that is deliverable in space capacity terms within the town centre and that will not prejudice other strategic development objectives for the centre. 	<p>replacement for some of the older provision that does not meet occupier needs.</p> <p>As previously mentioned, increased provision of office space may compromise the ability of the town centre to meet other objectives, particularly those related to housing delivery.</p> <p>An increase level of provision of office space in the Town Centre will be tested as part of the Sustainability Appraisal.</p>	
			<p><i>Suitability and Viability of Land at Sovereign Harbour:</i> The draft ELLP's summary of this issue correctly outlines (1) the long standing Council priority for employment development to be delivered at the Harbour, (2) that this has not occurred (3) that the ELLP is to consider the suitability and viability of land here for office development.</p> <p>The ELR identifies an overall B1a requirement for the town of 20,766 sq.m. allowing for losses and churn within the town's office stock. This is translated into a proposed allocation of 20,000sq.m. at the Harbour: i.e. effectively the total amount of office space assessed to be required within the town overall through to 2027.</p> <p>EBC's proposed allocation takes into account the Innovation Mall which has been applied for, albeit this</p>	<p>Reference within background documents to 3,000 sqm at the Innovation Mall will be amended to 2,300 sqm</p> <p>The allocation of 20,000 sqm of office space at Sovereign Harbour is an attempt to rebalance the office stock portfolio in order to provide occupier choice and support economic growth. Currently, 90% of office stock is located in the town centre and this does</p>	<p>No change to ELLP</p> <p>Reference within background documents to 3,000 sqm at the Innovation Mall will be amended to 2,300 sqm</p>

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			<p>will total just 2,300sq.m. not 3,000sq.m. as referenced within the ELR (para 4.75).</p> <p>Based upon EBC's proposed allocation of 20,000.sq.m, once the Innovation Mall is delivered this will leave a remaining allocation of 17,700sq.m. to still be delivered at the Harbour.</p> <p>This allocation may represent a reduction of 10,000sq.m. on the CSLP allocation for the Harbour (i.e. 30,000sq.m. of B1 space), but again this amount is not substantiated in terms of how this meets with market demand, market trends and strategic planning and sustainability objectives.</p> <p>The ELR at its para 4.79 to 4.82 itself outlines the significant viability constraints at the Harbour. At its paras 4.84 and 4.85 the ELR states that: However the availability of public sector funding via the Growing Places Fund is likely to help overcome some of these challenges. It will help to establish Sovereign Harbour as an employment location and by providing on site servicing reduces some of the prohibitive barriers to entry. Both will help to attract future demand as the economy recovers and potentially enable that demand to be realised.</p> <p>If these barriers can be overcome with public sector support then the vacant land at Sovereign Harbour could have an important role to play in accommodating future economic growth by providing a new, high quality location that is considerably different to current employment areas and the town centre and provides additional capacity for growth.</p> <p>Receipt of a public subsidy may unlock some of the infrastructure servicing constraints on part of the land at the Harbour and may provide accommodation that</p>	<p>not offer the choice that the market requires. Providing a balanced portfolio of office provision will help meet market demand and provides sustainability benefits in relation to economic growth.</p> <p>It is established practice for public funded employment space to 'lead' or support new commercial districts as it allows for future delivery on 'market terms', provides proof that there is a market for such development and helps establish new sectors.</p> <p>The Innovation Mall can play an important role in demonstrating the potential of Sovereign Harbour as a new economic hub. The provision of publicly subsidised space has been a key tool in a number of locations to support wider, private sector, employment development. Examples of this are locations such</p>	

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			<p>can in turn be offered at subsidised (lower) rentals in support of small / start-up businesses. This subsidy will bring occupancy costs of new high quality space at the Harbour more in line with town centre costs and as such the Harbour will be more likely to attract occupiers.</p> <p>This benefit however only addresses (part of) Site 6 and in time occupancy charges for the subsidised space will no doubt have to increase to reflect open market values.</p> <p>The fact that Site 6 will benefit from being heavily subsidised even in the short to medium term will however significantly impact on the ability to deliver equivalent space on neighbouring non-subsidised sites.</p> <p>The development costs of Sites 4 and 7 will be unchanged and will reflect the longstanding viability constraints of these sites in terms of their additional servicing costs. The open market rent or sale prices that will be required to recover those costs and provide a development profit unaided by grant support will be at a further significant premium compared with the supported space on Site 6.</p> <p>The development of Sites 4 and 7 for offices will thereby not only be unviable based on general development cost considerations but will have the additional constraint of having to compete against the advantages of the subsidised accommodation on Site 6.</p> <p>By acknowledging the viability issues at the Harbour and the need for grant subsidy to deliver new space here, demonstrates awareness of the reasons why the Harbour has not delivered office space to date. The failure of the ELR and the ELLP to acknowledge the implications of this as a constraint to the delivery of</p>	<p>as Silverstone and the Medway Innovation Centre.</p> <p>It is not considered that the subsidised provision on Site 6 will have any negative impact of the viability of the remaining sites.</p>	

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			<p>additional unsubsidised space however is a major flaw.</p> <p>By going on to recommend that the most substantial share of the town's allocated office space should be directed to the Harbour in spite of these viability issues is flawed and is unsound.</p>		
			<p><i>Eastbourne and South Wealden area:</i> The ELLP's summary of this matter refers to the relationship between these two neighbouring areas and in particular between Eastbourne, Polegate and Hailsham. It also refers to the 2008 masterplan that was produced for this area.</p> <p>The representations submitted on behalf of SHL at that time also emphasised the primary focus for growth between the two authorities was along the north-south corridor and at the core hub at Polegate / Stone Cross.</p> <p>The ELLP stakeholder event held in June 2013 focused quite significantly on the strength of this north-south corridor and on the opportunities to build further upon it. Sovereign Harbour remains very much peripheral to this area.</p> <p>There is scope to develop further employment space within and along the corridor without the need to rely upon new space at Sovereign Harbour. The ELR / ELLP ignores this, representing a further flaw in the range of alternative allocation options that should be considered.</p>	<p>In order to ensure economic growth in the area, a balanced provision of office space should be provided. This means provision in town centre and out of centre locations. Sovereign Harbour is not considered to be peripheral to the Eastbourne and South Wealden area as a whole as it can provide something that is not present in the rest of the area.</p>	<p>No change to ELLP</p>
PD-ELLP/26	<p>Teal Planning Ltd (Marie Nagy)</p> <p>On behalf of Sovereign Harbour Limited</p>		<p>The vision, and the emphasis placed within it on sustainability measures and objectives, are supported.</p> <p>The setting out of the alternative options for the distribution of new office space and the scoring of these options within the ELLP's accompanying documents however are not sufficiently appraised to ensure that</p>	<p>An increased amount of office provision in the Town Centre will be tested through the Sustainability Appraisal.</p>	<p>No change to ELLP</p> <p>Increased office provision to be tested as part of the Sustainability Appraisal</p>

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	(Mark Orriss)		<p>the ELLP's vision will be achieved to its fullest possible extent.</p> <p>This includes a failure to identify and appraise all reasonable alternative office space allocation options.</p>		
PD-ELLP/27	<p>Teal Planning Ltd (Marie Nagy)</p> <p>On behalf of Sovereign Harbour Limited (Mark Orriss)</p>		<p>The draft ELLP identifies the Key Spatial Objectives (KSO) of the CSLP that are considered to be of most relevance to the ELLP and which set a template for the appraisal of options for growth within and across the town.</p> <p>Whilst KSO3 focuses upon the shopping and leisure role of Eastbourne town centre, this does link to wider considerations of how to help sustain the centre as a vibrant, high quality destination.</p> <p>EBC's policy approach for the town centre recognises the benefit of supporting new residential development within the centre, which will contribute to meeting housing requirements and provide additional footfall and patronage for service providers within the centre.</p> <p>The vitality and sustainability of service provision however is also dependent upon a wider commercial and employment base that provides important weekday and evening footfall.</p> <p>The ELLP's proposed allocation of just 3,000sq.m. of new office space to be provided within the centre fails to make this important link and will represent a net loss in the town centre's office stock, once forecast net losses are also taken into account. This undermines the ELLP's ability to meet CSLP KSO3 and the vision set out for the ELLP itself.</p> <p>CSLP KS08 and KS010 emphasise the need for development to be appropriately located to help reduce</p>	<p>90% of Eastbourne's office stock is already located in the town centre. The proposed approach would result in an increased provision of higher quality office provision as the losses of stock are likely to be poor quality and condition that does not meet occupier needs. A balanced provision of office space across the town, including the replacement of old stock in the town centre with new high quality provision, will help meet the Spatial Objectives.</p> <p>The proposal to rebalance the office provision in the town will still result in the majority of the office space being located in the town centre. This means that the majority will still be appropriately located to help reduce car-based travel, but will also</p>	No change to ELLP

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			<p>car-based travel and to ensure that development is of an appropriate scale to achieve sustainability of each of the town's neighbourhoods in terms of their infrastructure capacity and opportunities to meet identified requirements. These considerations are also relevant to the achievement of the ELLP's overall vision and to the sustainability appraisal of development options.</p> <p>Leading from the consideration of the CSLP objectives, the five objectives identified for the ELLP itself are supported.</p> <p>The definition and explanation of ELLP5 (To promote sustainable employment locations) however should be expanded to capture the wider understanding of what contributes to sustainable employment locations; namely locations that are sustainable in transport terms and where businesses are supported and sustainable through established business linkages: i.e. the considerations addressed through CSLP KSO 3, 8 and 10 as outlined above.</p>	<p>provide choice for occupiers who would prefer an out of centre location.</p> <p>It is not considered necessary to expand the definition of Objective ELLP5 as these are explained elsewhere, including through the Sustainability Appraisal.</p>	
PD-ELLP/28	<p>Teal Planning Ltd (Marie Nagy)</p> <p>On behalf of Sovereign Harbour Limited (Mark Orriss)</p>	Scenario 1: Industrial Estates	<ul style="list-style-type: none"> Disadvantages. Included is a consideration that the existing estates are Unsuitable for high quality office development. Some such space has been provided on existing estates and additional new provision should not automatically be ruled out. Advantages. The ELLP's summary conclusion states that the existing estates are suitable for B1 space. This includes potential office space. The ELLP however again makes no account for this in its proposed allocation of new space. 	<p>It is unlikely that high quality office development will locate within industrial estates because the industrial environment is unlikely to meet their requirements. However, Policy EL2 does not prevent the development of office space within the Industrial Estates.</p>	No change to ELLP

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		Scenario 4: Town Centre	<ul style="list-style-type: none"> • The town centre is appraised as being unsuitable for other non office B uses. Some sites, for instance TCLP DOSs Two and Three could be appropriate for Class B1b use, in view of their size, their setting and fact that they are assessed as appropriate for mixed use schemes. Class B1b by definition is appropriate as a neighbour to residential uses and can occupy space of a very similar specification to B1a space. • Other forms of development [within the town centre] may be more viable. This can be applied to all sites across the town. It should therefore be struck through as a disadvantage to be taken into account only in relation to the town centre. • the allocation of employment space will have an adverse impact on the delivery of housing. The CSLP has appraised the delivery of housing sites within the town centre and has identified employment opportunity sites and transition areas. The ELLP must strike the right balance between commercial, residential and other uses that can and should be directed to the centre. The ELLP however places too significant emphasis on new residential space at the cost of office development. As such, the ELLP's assessment of the DOSs has underestimated the potential of these sites to accommodate sizeable new office spaces without undermining the delivery of new homes. The two aims are not mutually exclusive. • Land within the town centre has not been assembled. This goes against the evidence put forward in support of the TCLP which sets out a delivery programme for each of the DOSs and a 	<p>Office provision includes class B1a and B1b uses, and therefore it is considered that B1b uses would be appropriate in the town centre.</p> <p>It is accepted that other forms of development being more viable is an issue across the whole town, and therefore it will be removed as a disadvantage for the town centre.</p> <p>It is considered that the provision of office space may impact on housing delivery. There are three remaining development sites identified in the TCLP, and these will be required to accommodate the office provision and 450 residential units, as well as retail and community uses. A significant increase in office provision will affect the capacity of the remaining sites to deliver the housing requirement. This, coupled with the fact that the majority of office space is already located in</p>	<p>No change to ELLP</p> <p>Amendments to be made to the Employment Land Strategy and Distributions Options Report</p>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			<p>policy framework for reviewing additional site options should further opportunities be required to meet development needs. Part of the role of planning is to facilitate land assembly and this should not be so readily dismissed as an option for town centre sites where the economic linkage benefits from new investment are the strongest.</p>	<p>the town centre, means that there is no reason to increase the amount of office provision at the expense of residential development.</p> <p>There are limited opportunities in the Town Centre to deliver office space. The ELR identifies that Development Opportunity Sites 2 and 3 would be the most attractive sites for office development. There are issues associated with bringing these sites forward as both sites are in multiple ownership. This is a disadvantage when compared to other locations that are currently in single ownership.</p>	
		Scenario 5: Sovereign Harbour	<p>Advantages</p> <ul style="list-style-type: none"> Fewer design and layout constraints: the sites at Sovereign Harbour are subject to prescriptive design parameters set out within the Harbour SPD which include building heights and in the case of Site 4 building footprint. Development here will also need to be supported by appropriate on-site car parking which will take up development capacity. In contrast, the larger town centre sites may be less 	<p>Sites 6 and 7 are currently vacant sites with limited design constraints and are essentially a blank canvas. The Sovereign Harbour SPD provides guidelines for design but not to the extent that they would constraint development.</p>	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			<p>restricted in particular where reliance on public transport and public car parks can be significant benefits and greater flexibility may be applied to building heights, working with changes in site levels and existing neighbouring tall buildings.</p> <ul style="list-style-type: none"> • Increases distribution of employment opportunities and employment within a Sustainable Centre. These are agreed but this does not justify such a significant proposed quantum of new office floorspace being allocated here, relative to the town centre. • High Quality Environment. This equally applies to the town centre which provides more significant linked service benefits and attractions, in contrast with a business park setting. • Could attract a mixture of business sizes. This again equally applies to (1) the town centre in view of the mix and size of development sites available and (2) to potential development opportunities within the existing employment estates across the town which have demonstrated the ability to accommodate new campus developments. • Sites ready to develop. The sites may be less constrained in terms of their being undeveloped with clear access arrangements compared with some town centre sites. They however do require servicing upgrades and are required to deliver a high quality environment and stock of accommodation which, given the scale and nature of the Eastbourne market have resulted in no viable open market office development being secured. The sites may be ready to develop but this does not mean they are deliverable in market terms for a 	<p>In addition, the SPD was subject to public consultation and SHL made extensive representations. It is considered that the Sovereign Harbour sites have fewer design and layout constraints than other locations.</p> <p>The provision of employment space within a Sustainable Centre is an advantage.</p> <p>Sovereign Harbour provides an attractive offer that is different to the town centre that will appeal to occupiers with different needs.</p> <p>Sovereign Harbour has greater potential to attract a mixture of business sizes due to fewer constraints on design and layout. This means that there are less constraints on the types of employment space that can be provided. This does not apply equally to the town centre or other industrial locations as there are more</p>	

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			<p>large amount of space.</p> <p>Disadvantages</p> <ul style="list-style-type: none"> Potential noise issues on residential amenity. Class B1 use is by definition compatible with residential development. Class B1c may raise more issues, however this is envisaged only to potentially comprise a small amount of space on Site 6 at the Harbour. This lack of constraint however again does not deem the Harbour appropriate for a significant B1a/B1b allocation; other wider considerations of economic and environmental based sustainability must be taken into account. 	<p>constraints on design and layout in these locations.</p> <p>It is likely that any development site will require servicing upgrades. It is not considered that this has any effect on the advantage of the sites at Sovereign Harbour being ready to develop. It is considered that the Innovation Mail currently being built on Site 6 will be a catalyst for further provision of B space in the location.</p> <p>As Sovereign Harbour contains a significant amount of residential development, there is potential that any type of employment development may cause some form of noise disturbance. It is recognised that B1 uses are compatible with residential uses. However, it is appropriate to identify this as a potential disadvantage.</p>	
PD-ELLP/29	Teal Planning Ltd (Marie Nagy)		Yes. The Draft ELLP and its supporting documents fail to consider all reasonable alternatives and as such are	An increased amount of office provision in the	No change to ELLP Increased office provision

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	On behalf of Sovereign Harbour Limited (Mark Orriss)		not SEA compliant. The accompanying Response Statement reappraises the ELLP's proposed distribution of new office space taking more fully into account sustainable location and accessibility issues. It also appraises the option of providing a higher allocation of office space in the town centre, alongside a lower amount of subsidised space at the Harbour. This shows a still higher sustainability score for both locations compared with EBC's preferred option.	Town Centre will be tested through the Sustainability Appraisal.	to be tested as part of the Sustainability Appraisal
PD-ELLP/30	Teal Planning Ltd (Marie Nagy) On behalf of Sovereign Harbour Limited (Mark Orriss)		No. The broad preferred locations comprising: intensification of existing estates (Scenario 1), the town centre (Scenario 3) and Sovereign Harbour (Scenario 4) are supported in principle. The specification of Scenarios 3 and 4 however are not supported and are not NPPF compliant. They must be redefined based upon a greater priority weighting of new office floorspace to the town centre.	As previously mentioned, the evidence suggest that a more balanced portfolio of office space in Eastbourne is required, which means directly some away from the town centre. However, an increased amount of office provision in the Town Centre will be tested through the Sustainability Appraisal.	No change to ELLP Increased office provision to be tested as part of the Sustainability Appraisal
PD-ELLP/31	Teal Planning Ltd (Marie Nagy) On behalf of Sovereign Harbour Limited (Mark Orriss)		No. EBC's preferred option is based upon an unsubstantiated weighting of new Class B1 space at Sovereign Harbour which does not best meet sound or sustainable strategic planning objectives for Eastbourne town overall and raises issues of viability and deliverability in respect of the amount of space that is proposed to be allocated at the Harbour.	As previously described, the majority of office provision in Eastbourne is located in the town centre, and provision in other locations is required in order to rebalance the portfolio and provide occupier choice to	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			The distribution of Class B1 space must be rebalanced. The ELLP must also recognise the potential for further office campus development within the town's other existing employment areas.	encourage economic growth. Whilst there may be some office development on industrial estates, it is unlikely to be campus developments.	
PD-ELLP/32	Southern Water (Sarah Harrison)	Policy EL2	Southern Water sewerage infrastructure crosses the designated Industrial Estates. It is requested that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. Proposed additional text to be included in Policy EL2: <i>Development proposals must ensure future access to the existing Southern Water infrastructure for maintenance and upsizing purposes.</i>	It is not considered that this is an issue that needs to be referenced in a strategic planning document. This is a matter to be dealt with at the planning application stage, where consideration will be given to these detailed issues. It could be addressed as part of an informative as part of any planning application.	No change to ELLP
PD-ELLP/33	Southern Water (Sarah Harrison)	Policy EL3	Southern Water sewerage infrastructure crosses Development Opportunity Site 2: Land adjoining the Railway Station and the Enterprise Centre and Development Opportunity Site 3: Land between Upperton Road and Southfields Road. It is requested that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. Proposed additional text to be included in Policy EL3:	It is not considered that this is an issue that needs to be referenced in a strategic planning document. This is a matter to be dealt with at the planning application stage, where consideration will be given to these detailed issues. It could be	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			<i>Development proposals must ensure future access to the existing Southern Water infrastructure for maintenance and upsizing purposes.</i>	addressed as part of an informative as part of any planning application.	
PD-ELLP/34	Southern Water (Sarah Harrison)	Policy EL4	<p>Southern Water sewerage infrastructure crosses Site 4 Land of Harbour Quay and Site 7 Land fronting Pevensey Bay Road and Pacific Drive. It is requested that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing.</p> <p>Proposed additional text to be included in Policy EL4:</p> <p><i>Development proposals must ensure future access to the existing Southern Water infrastructure for maintenance and upsizing purposes.</i></p>	<p>It is not considered that this is an issue that needs to be referenced in a strategic planning document.</p> <p>This is a matter to be dealt with at the planning application stage, where consideration will be given to these detailed issues. It addressed as part of an informative as part of any planning application.</p>	No change to ELLP
PD-ELLP/35	Planning Potential (Leigh Thomas)	<i>Evidence supporting the ELLP</i>	<p>The ELR forms part of the evidence base to inform the emerging ELLP. Specifically in respect of the Cosmetica site, the ELR suggests that the site "...could be redeveloped to provide more modern floorspace"</p> <p>The ELR does not include specific reference to the NPPF tests and requirements in respect of employment sites allocations, including para. 21 referred to above.</p> <p>The ELR was not subject of consultation with either third parties or landowners during its preparation and certainly we can confirm that at no time were ARca contacted in respect of the former Cosmetica site. This is perhaps unfortunate and again is surprising given their previous discussions with the Council, the local prominence of this site and the genuine difficulties that had been expressed in respect of trying to secure a B</p>	<p>The ELR will be reviewed and amended to include reference to the NPPF.</p> <p>The ELR was prepared in consultation with land owners and promoters where these were identified both via workshop and one to one meetings. This approach was in line with guidance at the time of ELR preparation. The ELR will be revised to highlight the consultation approach.</p>	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			<p>Use Class at the site, including having applied for planning permission for smaller units by the previous owner to ARCa.</p> <p>The fact that the previous owner TAM had gone as far as trying to secure a more attractive planning position for B Use demonstrates the attempts made to move forward. That this has not happened is further evidence of the genuine difficulties experienced to date that have been overlooked in the conclusions reached by the ELR.</p>		
		<p>Vision and Objectives</p>	<p>Given both our experience, knowledge and concerns expressed above, we are equally concerned with the weight to be attached to the PDELLP, particularly in respect of the former Cosmetica site.</p> <p>In this context we again reiterate our concerns that to continue to protect sites such as the former Cosmetica for B Use Classes, where there is clear evidence that, "...there is no reasonable prospect of a site being used for that purpose" is contrary to the requirements of the NPPF para. 21. It is our clear position that this genuine issue, as recognised in national policy must be taken into account in the emerging ELLP.</p>	<p>NPPF para 21 sets the direction for Local Planning Authorities to identify strategic sites (or set criteria to identify them) for local and inward investment to meet "anticipated needs over the plan period".</p> <p>Therefore, Employment land designations must be considered in the context of demand over the plan period, rather than reflecting short-term market fluctuations.</p> <p>Given the constrained nature of the town, lack of land availability and the relatively high requirement for residential development, it is important to protect sites already providing an</p>	<p>No change to ELLP</p>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				<p>employment use within a predominantly industrial location. Although the site may have been vacant over recent years, the demand for employment land over the plan period will increase.</p> <p>Although certain buildings will not meet future needs, this does not mean that land itself is redundant over the life of the plan.</p> <p>The loss of identified employment land will constrain future economic growth and compromises the ability of the town to meet future employment needs.</p>	

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
		Policy EL2	<p>Object to the former Cosmetica site be subject to the same policy protection as the remainder of Brampton Road Industrial Estate. The site has been vacant for over 4 years and remains so despite marketing and attempts through a planning application to make it more attractive for B Use Classes. There is no justification for it to remain protected for such uses and to do so will simply lead to the site continuing to be vacant and would be contrary to both evidence and the NPPF.</p> <p>Policy EL2 is considered to be overly restrictive and does not allow for redevelopment, especially in instances where it is demonstrated that there is no reasonable prospect of continued B use class.</p> <p>Policy EL2 creates ambiguity suggesting that non-B uses would only be acceptable in respect of change of use rather than redevelopment. This is unreasonable and does not account for instances where a premises is no longer fit for purpose. As such, it is suggested that the final paragraph is amended to read:</p> <p><i>"Within designated Industrial Estates, change of use or redevelopment of units in class B use to other employment generating non-B uses may be acceptable subject to genuine redundancy of the unit being demonstrated"</i></p> <p>Further, it is noted that in order to demonstrate genuine redundancy, applications would be tested against saved policy BI1 of the Eastbourne Borough Local Plan 2001 - 2011. This policy is now considerably out-of-date, and has been superseded by the NPPF. As such, it is respectfully submitted that a more up-to-date test, that has been subject of public consultation and is shown to be in accordance with the NPPF is</p>	<p>The Cosmetica site is part of the Brampton Road Industrial Estate. It is accessed via the main estate road and it is surrounded by similar uses.</p> <p>Being within the Brampton Road Industrial Estate, it is considered appropriate that it is given the same policy protection as the rest of the Industrial Estate.</p> <p>It is not considered that Policy EL2 is overly restrictive. Policy EL2 aims to ensure that the redevelopment of sites within Industrial Estate must be within class B use.</p> <p>However, it is considered that Policy EL2 could be expanded to include reference to allowing redevelopment in instances where it can be demonstrated that the loss of the site would not impact upon the long term supply of employment land and the</p>	<p>Delete the final two paras of Policy EL2 and replace with:</p> <p>Proposals for redevelopment of sites within a designated industrial estate in class B use to an alternative non-B use will only be granted where it can be demonstrated to the satisfaction of the Council that:</p> <ul style="list-style-type: none"> • The purposed alternative use is an appropriate use to the industrial estate that cannot be located elsewhere due to its un-neighbourliness; or • The loss of the site would not impact upon the long term supply of the employment land in terms of quality and quantity; and • The site does not meet the current or long term needs of modern business, and could not be upgraded

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			<p>necessary.</p>	<p>site cannot be upgraded to meet current or long term needs.</p> <p>The ELLP recognises that a number of units are part of a sub-divided larger unit, and there may be situations where there is no 'B use' demand for an older unit that is part of a larger building, although the other units may still be occupied. In these situations, it would not be beneficial for that unit to sit empty until the whole site is available for redevelopment, and therefore, subject to it being demonstrated that the unit will not be used for B use again, these units should be allowed to change use to remain in occupation until full redevelopment can take place.</p> <p>The NPPF is clear that just because a policy was adopted prior to the publication of the NPPF, it does not automatically mean that the policy is out of date. Although it is</p>	<p>to do so.</p> <p>Within the designated Industrial Estates, change of use of units in class B use to other employment generating non B-class uses may be granted where it can be demonstrated to the satisfaction of the Council that there is no reasonable prospect of the site continuing to be used for class B use.</p>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				<p>not considered that Borough Plan Policy BI1 and the related Supplementary Planning Guidance are out of date, in order to be consistent with the NPPF, reference to genuine redundancy will be replaced with 'no reasonable prospect'.</p>	

APPENDIX 2

Schedule of Changes

The table below provides a schedule of the changes that should be made to the Employment Land Local Plan in order to progress to Proposed Submission. The majority of the changes are proposed as a response to the representations received during the public consultation on the Proposed Draft Employment Land Local Plan between 14 December 2013 and 14 March 2014, and these can be identified by the Rep ID. Other changes are proposed to add clarity or revise description of the procedure.

Ref	Rep ID	Section	Modification	Reason
PS-C1	n/a	Introduction - What is the Employment Land Local Plan	Delete final sentence of para 1.2	To provide consistency for Proposed Submission Version
PS-C2	n/a	Introduction - What is the Employment Land Local Plan	Add additional para after 1.3 to read: It should be noted that although the National Planning Policy Framework (NPPF) defines economic development as being development within the B Use Classes, public and community uses and main town centre uses, employment land in the context of the Employment Land Local Plan only relates to development of Class B Uses. Other uses are dealt with through the Eastbourne Core Strategy Local Plan 2006-2027 (adopted 2013).	To provide clarification on what is meant by 'employment land'.
PS-C3	n/a	Introduction - Format of the Proposed Draft Employment Land Local Plan	Replace para 1.4: The Proposed Submission Employment Land Local Plan has been published for an eight week period in order to receive representations on matters of soundness in accordance with Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012. The Proposed Submission version presents the proposed strategy and policies relating to the employment land supply over the Core Strategy plan period up to 2027.	To provide consistency for Proposed Submission Version

Ref	Rep ID	Section	Modification	Reason
PS-C4	n/a	Introduction - Format of the Proposed Draft Employment Land Local Plan	Delete para 1.5	To provide consistency for Proposed Submission Version
PS-C5	n/a	Introduction - Format of the Proposed Draft Employment Land Local Plan	Replace para 1.6: The Proposed Submission Employment Land Local Plan takes into account representations that were received through pre-production stakeholder engagement, and via consultation on the Proposed Draft Employment Land Local Plan that took place between December 2013 and March 2014.	To provide consistency for Proposed Submission Version
PS-C6	n/a	Introduction - Format of the Proposed Draft Employment Land Local Plan	Add additional bullets: <ul style="list-style-type: none"> Supplementary Employment Land Evidence (GVA, 2014) Employment Land Review Viability Briefing Note (GVA, 2014) 	To provide consistency for Proposed Submission Version
PS-C7	PD-ELLP/09	Introduction – Relationship with Other Plans and Strategies	Add two new paras after para 1.14 to read: <i>The South East Local Enterprise Partnership (SELEP) Strategic Economic Plan sets out proposals to drive economic expansion over the next six years. The bid for the Government’s Local Growth Fund is supported by businesses, local authority and education leaders across the area. To date, funding has been award for the development of an Innovation Mall at Sovereign Harbour (via the Growing Places Fund), and transport schemes with committed funds from the Growth Deal for the ‘Hailsham, Polegate and Eastbourne Sustainable Corridor’ and an Eastbourne and South Wealden walking and cycling package.</i> <i>EU Structural Investment Funds 2014-20 will enable the SELEP to combine resources from both Europe and national government to deliver economic growth in the South East. Funding themes include improving employability, enterprise growth, business support, innovation, export and new</i>	To add reference and a link to the South East Local Enterprise Partnership, the Strategic Economic Plan, and the EU Structural Investment Funds.

Ref	Rep ID	Section	Modification	Reason								
			<i>technologies.</i>									
PS-C8	n/a	Introduction - Stages in the Production of the Plan	Replace para 1.15 with: The timetable for the preparation of the Employment Land Local Plan is outlined in Table 1.	To provide consistency for Proposed Submission Version								
PS-C9	n/a	Introduction - Stages in the Production of the Plan	Delete para 1.16	To provide consistency for Proposed Submission Version								
PS-C10	n/a	Introduction - Stages in the Production of the Plan	In Table 1, replace: <table border="1" data-bbox="913 596 1675 967"> <tr> <td>Publication of Proposed Submission Version for representation period</td> <td>December 2014 – January 2015</td> </tr> <tr> <td>Submission to Secretary of State</td> <td>February 2015</td> </tr> <tr> <td>Examination in Public</td> <td>June 2015</td> </tr> <tr> <td>Adoption</td> <td>October 2015</td> </tr> </table>	Publication of Proposed Submission Version for representation period	December 2014 – January 2015	Submission to Secretary of State	February 2015	Examination in Public	June 2015	Adoption	October 2015	To provide consistency for Proposed Submission Version
Publication of Proposed Submission Version for representation period	December 2014 – January 2015											
Submission to Secretary of State	February 2015											
Examination in Public	June 2015											
Adoption	October 2015											
PS-C11	n/a	Introduction – How to comment on the Proposed Submission Employment Land Local Plan	Replace Para 1.17 with: The eight week representation period on the Proposed Submission Employment Land Local Plan commenced on 12 December 2014 and finishes on 6 February 2015. The Proposed Submission Employment Land Local Plan is accompanied by a Sustainability Appraisal Report, which is also available for comment.	To provide consistency for Proposed Submission Version								
PS-C12	n/a	Introduction – How to comment on the Proposed Submission Employment Land Local Plan	In Para 1.18, replace reference to Proposed Draft to Proposed Submission	To provide consistency for Proposed Submission Version								

Ref	Rep ID	Section	Modification	Reason
PS-C13	n/a	Introduction – How to comment on the Proposed Submission Employment Land Local Plan	In Para 1.18, replace Friday 14 March 2014 with Friday 6 February 2015	To provide consistency for Proposed Submission Version
PS-C14	PD-ELLP/10	Context – Existing Situation	In Para 2.3, include footnote references to data sources.	For clarification purposes
PS-C15	n/a	Context – Recent Developments and Future Projects	Amend par 2.18 to read: <i>In addition, the Council is intending to prepare a draft Economic Development and Tourism Strategy by the end of 2015 to help direct the current economy and build on this to determine a vision and destination for Eastbourne's economic future.</i>	To update the schedule for the Economic Development and Tourism Strategy
PS-C16	PD-ELLP/12	Context – Key Issues	Add additional sentence to end of para 2.20: <i>In addition, premises with super-fast broadband connectivity are a requirement for businesses aiming to grow and expand their markets, and improvements in broadband connectivity may influence the requirement for additional employment land in the area.</i>	To provide reference to broadband as an issue for employment space in Eastbourne
PS-C17	PD-ELLP/11	Context – Key Issues	Amend the final sentence of para 2.21 to state: <i>Also, by encouraging existing key businesses and their supply chains, there is an opportunity to grow existing specialisms and 'clusters'. This might include manufacturing activities, particularly related to mechanical products, and parts of the 'media' sector, such as film and TV production and production of recorded media, which are sectors that have been identified as being particularly strong in Eastbourne.</i>	To provide examples to aid understanding
PS-C18	PD-ELLP/11	Context – Key Issues	Amend para 2.22 to read: <i>The nature of economic growth has changed over recent years and Eastbourne has seen lower levels of inward investment, mainly due to the age and quality of existing stock, and has</i>	In order to clarify that Eastbourne is not 'closing the door' on inward investment, but to recognise that future

Ref	Rep ID	Section	Modification	Reason
			<p><i>instead been more reliant on local investment from indigenous businesses.</i></p> <p><i>Future demand and growth in the market is still likely to be driven from local investment, either through expansion, changing space requirements or new business start-ups. However, as the economy grows, it is important to encourage inward investment by making provision for attracting like-minded new activities to the area. The Employment Land Local Plan needs to ensure it provides the right space in the right locations for inward investment but also provide the range of sites and premises required to ensure existing businesses are retained and can grow. This will also include the provision of a range of sites, including new, high quality floorspace alongside sites and premises to help increase the business start-up and survival rate and ensure indigenous businesses are retained and can grow.</i></p>	demand is likely to be driven by local business
PS-C19	PD-ELLP/25	Context – Key Issues	<p>Add additional text at end of para 2.23:</p> <p><i>Similarly, a significant amount of the office stock, especially in the town centre, is dated and does not tend to meet the needs of modern office occupiers. In many cases refurbishment is not possible to create "Grade A" space as floor to ceiling heights are not sufficient to allow modern servicing and infrastructure to be incorporated.</i></p>	
PS-C20	n/a	Context – Key Issues	At para 2.29, Delete Question 1 box	No requirement for this question as part of the Proposed Submission version
PS-C21	PD-ELLP/13	Context – Employment Land Requirements	At para 2.30, include link to ELR within footnote	For clarification purposes
PS-C22	n/a	Context – Employment Land Requirements	At para 2.32, amend bullet points to read:	To clarify that the requirement for office space

Ref	Rep ID	Section	Modification	Reason
			<ul style="list-style-type: none"> Office (B1a/B1b) – 12 sqm per employee (NIA) Industrial (B1c/B2) – 36 sqm per employee (GEA) Warehouse (B8) – 70 sqm per employee (GEA) 	is based on net internal area, whilst the requirement for industrial and warehouse space is based on gross external area.
PS-C23	PD-ELLP/14	Context – Vision and Objectives	Amend the Vision to read: <i>"By 2027, Eastbourne will be making a strong contribution to the sustainability of the local economy, not just in the town but also in south Wealden, by providing a range of business premises in sustainable locations and offering a range of job opportunities, making the town a place where people want to live and work"</i>	For clarification purposes
PS-C24	PD-ELLP/15	Context – Vision and Objectives	ELLP2 delete: <i>'diversify the local economy and...'</i>	To emphasise the difference between ELLP2 and ELLP4
PS-C25	PD-ELLP/15	Context – Vision and Objectives	Amend ELLP4 to read: <i>'ELLP4 - Support Existing Businesses - To support existing businesses in staying in the town by allowing them to relocate to premises in the town that better meet their needs and help them to flourish'.</i>	To emphasise the difference between ELLP2 and ELLP4
PS-C26	n/a	Context – Vision and Objectives	At para 2.42, delete Question 2 and Question 3 box	No requirement for this question as part of the Proposed Submission version
PS-C27	n/a	Strategy – Employment Land Strategy and Distribution	At para 3.1, delete 'Options considered for employment land strategy and distribution' box	No requirement for this question as part of the Proposed Submission version
PS-C28	n/a	Strategy – Employment Land Strategy and Distribution	At para 3.1, delete Question 4, Question 5 and Question 6 box	No requirement for this question as part of the Proposed Submission version

Ref	Rep ID	Section	Modification	Reason
PS-C29	n/a	Strategy – Employment Land Strategy and Distribution	At para 3.7, delete Question 7 box	No requirement for this question as part of the Proposed Submission version
PS-C30	PD-ELLP/20	Strategy – Economy and Employment Land	Add sentence at end of para 3.11 to read: <i>Examples of this type of development in other parts of East Sussex include the Priory Quarter and North Queensway Innovation Park in Hastings, and the Basepoint Enterprise Centre in Newhaven.</i>	To provide examples to aid understanding
PS-C31	PD-ELLP/20	Strategy – Economy and Employment Land	Amend 3.12 to read: <i>Eastbourne should further the development of 'clusters', including but not limited to mechanical manufacturing and film and TV production, by using existing key businesses and their supply chains as an opportunity to grow existing specialisms through promotion and provision of appropriate space. The role of these clusters should be enhanced in the Borough both as a 'selling point' to attract occupiers and through the development of links to suppliers locally.</i>	To provide examples to aid understanding
PS-C32	PD-ELLP/20	Strategy – Economy and Employment Land	Amend final sentence of para 3.15 to read: <i>Eastbourne Borough Council will work with the existing education and skills institutions to enhance provision, in order to address skill shortages, increase the working age population and improve the 'economic catchment' of the Borough.</i>	For clarification purposes
PS-C33	PD-ELLP/35	Policies – Policy EL2: Industrial Estates	Delete the final two paras of Policy EL2 and replace with: <i>Proposals for redevelopment of sites within a designated industrial estate in class B use to an alternative non-B use will only be granted where it can be demonstrated to the satisfaction of the Council that:</i> <ul style="list-style-type: none"><i>The purposed alternative use is an appropriate use to the</i>	To expand Policy EL2 to include reference to allowing redevelopment in instances where it can be demonstrated that the loss of the site would not impact upon the long term supply of employment

Ref	Rep ID	Section	Modification	Reason
			<p><i>industrial estate that cannot be located elsewhere due to its un-neighbourliness; or</i></p> <ul style="list-style-type: none"> <i>The loss of the site would not impact upon the long term supply of the employment land in terms of quality and quantity; and</i> <i>The site does not meet the current or long term needs of modern business, and could not be upgraded to do so.</i> <p><i>Within the designated Industrial Estates, change of use of units in class B use to other employment generating non B-class uses may be granted where it can be demonstrated to the satisfaction of the Council that that there is no reasonable prospect of the site continuing to be used for class B use.</i></p>	<p>land and the site cannot be upgraded to meet current or long term needs.</p> <p>To provide consistency with the NPPF</p>
PS-C34	n/a	Policies – Industrial Estates	<p>Replace the final sentence of para 4.14 with:</p> <p>... subject to it being demonstrated to the satisfaction of the Council that there is no reasonable prospect of the premises continuing to be used for class B use.</p>	To provide consistency with Policy EL2
PS-C35	PD-ELLP/22	Policies – Town Centre	<p>Amend final sentence of 4.20 to read:</p> <p><i>Therefore, proposals for the refurbishment of existing office stock within the Town Centre will be supported, to meet modern occupier demands where they come forward.</i></p>	For clarification purposes
PS-C36	n/a	Policies – Sovereign Harbour	In para 4.36, change reference to 3,000sqm to 2,300 sqm NIA	To provide floorspace in NIA
PS-C37	n/a	Appendix 1: Glossary	Delete Development Management Local Plan and description	The Development Management Local Plan is no longer being taken forward
PS-C38	n/a	Appendix 1: Glossary	<p>Add:</p> <p>Gross External Area (GEA) - The total floor area contained within</p>	Provide explanation for GEA, which is referenced in the

Ref	Rep ID	Section	Modification	Reason
			the building measured to the external face of the external walls	document
PS-C39	n/a	Appendix 1: Glossary	Add: Gross Internal Area (GIA) - The floor area contained within the building measured to the internal face of the external walls	Provide explanation for GIA, which is referenced in the document
PS-C40	n/a	Appendix 1: Glossary	Add: Net Internal Area (NIA) - The usable floor area, which is the Gross Internal Area (GIA) less the floor areas taken up by lobbies, enclosed machinery rooms on the roof, stairs and escalators, mechanical and electrical services, lifts, columns, toilet areas, ducts, and risers.	Provide explanation for NIA, which is referenced in the document
PS-C41	n/a	Appendix 2: Designated Industrial Estates	Replace plan of Highfield (South) Industrial Estate with updated version	To extend the boundary in recognition of the fact that the extension to the Gardners Books development is outside of the previous boundary
PS-C42	n/a	Appendix 2: Designated Industrial Estates	Replace plan of Highfield (North) Industrial Estate and Highfield Park with updated version	To reflect changes in the basemap that now show the Morrisons development

Body:	Cabinet
Date:	10 December 2014
Subject:	Council Tax Discretionary Reduction Policy
Report Of:	Ian Fitzpatrick, Senior Head of Community
Ward(s)	All
Purpose	To present a Council Tax Discretionary Reduction Policy for consideration.
Recommendation:	That Cabinet adopt the policy.
Contact:	Bill McCafferty, Revenues and Benefits Manager, Telephone 01323 415171 or internally on extension 5171. E-mail address: bill.mccafferty@eastbourne.gov.uk

1.0 Introduction

- 1.1 Section 13a 1c of the Local Government Finance Act 1992 provides the council with additional statutory powers to enable it to reduce the council tax liability of council taxpayers.
- 1.2 These discretionary awards can be given to
- Individual council taxpayers
 - Groups of council taxpayers
 - Council taxpayers within a defined area; or
 - All council taxpayers in the Council's area.
- 1.3 The provision allows the Council the discretion to provide assistance to taxpayers where either the existing legislation does not provide a discount or exemption or in such circumstances where the Council feels that the level of discount, exemption or reduction is insufficient given the circumstances of the taxpayer.

2.0 Council Tax Discretionary Reduction Policy

- 2.1 The Council does not currently have a policy on the awarding of Discretionary Reductions for Council Tax.
- 2.2 A recent Valuation Tribunal decision on an appeal against a refusal to award a discretionary reduction, (S.C. v East Riding of Yorkshire Council and C.W. v East Riding of Yorkshire Council), refers to the importance of Councils having a Discretionary Scheme.
- 2.3 At 25 (6) of the decision it states, 'Although a scheme or policy is not required by statute, it is difficult to see how such an open-ended discretion

can be satisfactorily exercised in the absence of one’.

2.4 For this reason it is recommended that the Council adopt such a policy.

2.5 As none of the East Sussex Councils currently have a discretionary reduction policy, we have worked together on the development of a policy. Whilst each of our final policies may have slight differences, the main elements of each policy will be the same.

2.6 The proposed policy (Appendix A) refers to three categories of taxpayer for whom a discretionary reduction may be appropriate. Those categories are:

- Exceptional Financial Hardship
- Crisis, for example Fire or Flood
- Other circumstances

2.7 The policy sets out the process through which a taxpayer must go in applying for a reduction and lays some responsibility on the taxpayer to manage their finances by, for example:

- Ensuring that they have applied for any council tax discounts, exemptions or reduction that may be applicable;
- If appropriate, accepting assistance to enable them to manage their finances effectively; and
- Maximise their income through applying for welfare benefits and the cancellation of any non-essential contract.

2.8 One of the aims of the proposed policy is to ensure that the taxpayer has done everything in their power to enable them to meet their council tax liabilities without the need for additional financial support.

3.0 Appeals

3.1 Any appeals will, in the first instance, be dealt with by the Revenues and Benefits Manager. If the taxpayer does not agree with the decision, they have a further right of appeal to the Valuation Tribunal.

4.0 Consultation

4.1 Consultation has taken place with Members and local advice agencies. No adverse comments were received.

5.0 Resource Implications

5.1 Financial:

5.2 The cost of any awards fall on the Council.

5.3 The Valuation Tribunal decision, at 25 (15), makes it clear that the Council cannot set a budget for the maximum amount that can be awarded. As a result it is not possible to say what the maximum financial liability for the Council might be.

5.4 Staffing:

None.

6.0 Equalities

6.1 The Equality and Fairness Analysis does not highlight any areas of concern within the Policy.

7.0 Conclusion

7.1 That Cabinet adopt the proposed Council Tax Discretionary Reduction Policy for the reasons set out in this report.

lead officer name: Bill McCafferty

job title: Revenues and Benefits Manager

Background Papers:

The Background Papers used in compiling this report were as follows:

Local Government Finance Act 1992 (as amended).

The Valuation Tribunal for England Decision of 27 May 2014 – Appeal numbers 2001M113393 and 2001M117503.

Equality and Fairness Analysis Report

To inspect or obtain copies of background papers please refer to the contact officer listed above.

Appendix A – Council Tax Discretionary Reduction Policy

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Council Tax Discretionary Reduction in Liability Policy

Title	Council Tax Discretionary Reduction Policy
Version	1
Date	11/11/2104
Approved By	
Next Review	November 2015
Author	Revenues and Benefits Manager

Council Tax - Discretionary Reduction in Liability Policy	1
Introduction.....	3
Exceptional Financial Hardship.....	3
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Other Circumstances	5
Changes in circumstances	5
Duties of the applicant and the applicant’s household	5
The award and duration of a reduction in liability.....	5
Payment.....	6
Reductions in Council Tax liability granted in error or incorrectly.....	6
Notification of an reduction in liability.....	6
Appeals	6
Fraud.....	6
Complaints.....	6
Policy Review	7

1 Introduction

1.1 Section 13A 1c of the Local Government Finance Act 1992, provides the Council with additional discretionary powers to enable it to reduce the council tax liability where statutory discounts, exemptions and reductions do not apply.

1.2 These discretionary awards can be given to:

- Individual Council Taxpayers;
- Groups of Council Taxpayers defined by a common set of circumstances;
- Council Taxpayers within a defined area: or
- To all Council Taxpayers within the Council's area.

1.3 The legislation states the following:

.....in any case, may be reduced to such extent or, if the amount has been reduced under S13a 1 a (Council Tax Reduction Scheme) such further extent as the billing authority for the area in which the dwelling is situated thinks fit.....

1.4 The provision allows the Council the discretion to provide assistance to taxpayers where either the existing legislation does not provide a discount, exemption or reduction or in such circumstances where the Council feels that the level of discount; exemption or reduction is insufficient given the circumstances.

1.5 When deciding on whether to grant a discretionary award, the Council will consider each application on its merits. Principles of reasonableness will apply in all cases with the authority deciding each case on relevant merits.

1.6 Any decision made will be without reference to any budgetary considerations notwithstanding the fact that any awards must be balanced against the needs of local taxpayers who will ultimately pay for a reduction in Council Tax income.

1.7 Likewise the period of any reduced liability will be considered in conjunction with the circumstances of the Council Taxpayer.

1.8 For the purposes of administration, the decision to grant any reduction in liability shall be considered within the following categories:

2 Exceptional Financial Hardship

2.1 In accordance with Section 13A 1a of the Local Government Finance Act 1992, the Council has a Council Tax Reduction Scheme which provides support, through a discount, to those deemed to be within financial need. The Scheme has been designed to take into account the financial and specific circumstances of individuals through the use of applicable amounts, premiums and income disregards.

2.2 Applications will be accepted under this part of the policy for people who have qualified for support under the Council Tax Reduction Scheme but who are still experiencing severe financial hardship. Other taxpayers may also apply, however the Council would normally expect the taxpayer to apply for Council Tax Reduction in any case. Any unpaid Council Tax must not be the result of willful refusal to pay or culpable neglect

- 2.3 As part of the process of applying for additional support, all applicants must be willing to undertake **all** of the following:
- a. Make a separate application for assistance;
 - b. Provide full details of their income and expenditure. Details can include, but is not limited to Utility bills, bank and credit card statements;
 - c. The taxpayer is able to satisfy the Council that they are not able to meet their full Council Tax liability or part of their liability;
 - d. Identify potential changes in payment methods and arrangements to assist the applicant;
 - e. Assist the Council to minimise liability by ensuring that all discounts, exemptions and reductions are properly granted; and
 - f. The taxpayer has no access to assets that could be realised and used to pay the Council Tax and benefits, Council Tax Support, discounts and exemptions
- 2.4 The Council will be responsible for assessing applications against this policy and an officer will consider the following factors when applying this policy:
- a. Current household composition and specific circumstances including disability or caring responsibilities;
 - b. Current financial circumstances;
 - c. Determine what action(s) the applicant has taken to alleviate the situation;
 - d. Consider alternative means of support that may be available to the applicant by:
 - i. re-profiling council tax debts or other debts;
 - ii. applying for a Discretionary Housing Payment for Housing Benefit (where applicable);
 - iii. maximising other benefits;
 - iv. determining whether in the opinion of the decision maker the spending priorities of the applicant should be re-arranged.

3 Crisis – Flood, Fire etc.

- 3.1 The Council will consider requests for assistance from Council Taxpayers who, through no fault of their own, have experienced a crisis or event that has made their property uninhabitable e.g. due to fire or flooding, where they remain liable to pay council tax and for which they have no recourse for compensation nor have recourse to any statutory exemptions or discounts.
- 3.2 All such requests must be made in writing detailing the **exact** circumstances of why reduction in the liability is required and specifying when the situation is expected to be resolved.
- 3.3 The Council will consider applications on a case-by-case basis in consultation with other organisations as appropriate. Any reduction will be applied where they remain liable to pay council tax and for which they have no recourse for compensation or to any statutory exemptions or discounts or where the crisis or event is not covered by any insurance policy. The Council will not consider requests from taxpayers where government guidance or policy provides for a reduction in liability in specific circumstances for example, flood relief schemes.

4 Other Circumstances

- 4.1 The Council will consider requests from Council Taxpayers for a reduction in their liability based on other circumstances, not specifically mentioned within this document. However the Council must be of the opinion that the circumstances relating to the application warrant further reduction in their liability for Council Tax having regard to the effect on other Council Taxpayers.
- 4.2 No reduction in liability will be granted where any statutory exemption or discount could be granted.
- 4.3 No reduction in liability will be granted where it would conflict with any resolution, core priority or objective of the Council.

5 Changes in circumstances

- 5.1 The Council may revise any discretionary reduction in liability where the applicant's circumstances or situation has changed.
- 5.2 The taxpayer agrees that he/she must inform the Council immediately either by phone or in writing about any changes in their circumstances which might affect the claim for under this policy. Failure to do so may result in the withdrawal of the reduction granted for the year and the requirement to repay any outstanding amount to the Council. All changes in circumstances should be notified within 21 days in accordance with the Council Tax Reduction Schemes (Prescribed Requirements) (England) Regulations 2012 as amended.

6 Duties of the applicant and the applicant's household

- 6.1 A person claiming any discretionary reduction in liability must:
- Provide the Council with such information as it may require to make a decision;
 - Tell the Council of any changes in circumstances that may be relevant to their ongoing claim; and
 - Provide the Council with such other information as it may require in connection with their claim.
- 6.2 The application must be in writing from the ratepayer or someone authorised to act on their behalf.

7 The award and duration of a reduction in liability

- 7.1 Both the amount and the duration of the award are determined at the discretion of the Council, and will be done so on the basis of the evidence supplied and the circumstances of the claim.
- 7.2 The start date of such a payment and the duration of any payment will be determined by the Council. In any event, the maximum length of the award will not exceed the end of

the financial year in which the award is given.

8 Payment

- 8.1 In line with legislation, any award shall be granted as a reduction in the liability of the Council Tax Payer thereby reducing the amount of Council Tax payable

9 Reductions in Council Tax liability granted in error or incorrectly

- 9.1 Where a reduction in liability has been granted incorrectly or in error, either due to a failure to provide the correct or accurate information to the Council or some other circumstances, the amount will be recovered from the Council Taxpayers account in the normal way.

10 Notification of decision

- 10.1 The Council will notify the outcome of each application in writing. The notification will include the reason for the decision and advise the applicant of their appeal rights.

11 Appeals

- 11.1 Appeals against the Council's decision may be made in accordance with Section 16 of the Local Government Finance Act 1992, must be in writing and made within two months of the Council's decision.
- 11.2 The Council Taxpayer must in the first instance write to the Council outlining the reason for their appeal. Once received the Council will reconsider its decision and notify the Council Taxpayer accordingly.
- 11.3 Where the Council Taxpayer remains aggrieved, a further appeal can then be made to the Valuation Tribunal. This further appeal should be made within 2 months of the decision of the Council not to grant any reductions. Full details can be obtained from the Councils website or from the Valuation Tribunal <http://www.valuationtribunal.gov.uk/Home.aspx>

12 Fraud

- 12.1 The Council is committed to protecting public funds and ensuring funds are awarded to the people who are rightfully eligible to them.
- 12.2 An applicant who tries to fraudulently claim a reduction in liability by falsely declaring their circumstances, providing a false statement or evidence in support of their application, may have committed an offence under The Fraud Act 2006.
- 12.3 Where the Council suspects that such a fraud may have been committed, this matter will be investigated as appropriate and may lead to proceedings being instigated.

13 Complaints

13.1 The Council's 'Compliments and Complaints Procedure' (available on the Council's website) will be applied in the event of any complaint received about this policy.

14 Policy Review

14.1 This policy will be reviewed annually and updated as appropriate to ensure it remains fit for purpose. However, a review may take place sooner should there be any significant changes in legislation.

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Body: CABINET

Date: 10 December 2014

Subject: HUMAN RESOURCES POLICY REVIEW

Report of: Head of Corporate Development

Ward(s): ALL

Purpose: To share and propose a revised Redundancy and Redeployment Procedure

Contact: Becky Cooke, Human Resources Manager
Telephone 01323 415106 or internally on Extension 5106

Recommendations: That Cabinet :

1. approve the amended policy and recommend to Council for adoption.

1.0 Introduction

1.1 The Human Resources Strategy 2013-15 was approved by Cabinet in July 2013 and is the overarching strategic framework by which Eastbourne Borough Council's HR Team will support the organisation in achieving its long term business goals and outcomes.

1.2 The Strategy contains 5 priorities:

1. Develop and promote a performance management culture across the Council
2. Build capacity and capability within the Council
3. Ensure fit for purpose structures, job designs and reward
4. Deliver a core HR function with increasing focus on adding and creating value for our customers
5. Customer Service

1.3 Each of the priorities has a number of tangible outputs and measures of success. One output for Priority 4 – Deliver a core HR function with increasing focus on adding and creating value for our customers – is *'We will review all HR policies and procedures to make them shorter and simple to apply'*.

2.0 The Policy Review

2.1 The review of HR policies has been taking place over the last 12 months.

2.2 The majority of the changes have been around the style, format and length of the documents, with a view to making them more practical

and user friendly. Changes have also been made to reflect statutory (legislative) amendments.

2.3 The Redundancy and Redeployment Policy identified in Appendix One replaces the existing Alternative Employment Policy (AEP). Feedback from staff indicates that the provisions of the AEP are not fully understood. Experience of the HR team in the application of the AEP indicates that it does not adequately reflect the process to follow in cases of restructuring and redundancy, and is not clear about the support mechanisms in place for staff. Both these aspects have been considered in the drafting of the new policy, along with updated legislative requirements which are largely around statutory consultation requirements.

2.4 The new policy also gives clearer advice about the process for voluntary redundancy and the parameters within which it will be offered.

3.0 Consultation

3.1 Full discussions have taken place with Unison who have made some helpful and positive contributions to the policy being presented to Cabinet and have indicated their agreement to the content.

4.0 Resource Implications

4.1 There are no financial implications associated with the policy review.

5.0 Conclusion

Cabinet will recognise the enormous transformation that continues to take place at EBC. It is vital to ensure that our HR policies and procedures reflect the current organisation and are able to effectively support our transformational journey. Accordingly, Cabinet is asked to:

1. Approve the revised HR policy
2. Recommend adoption by Council

Peter Finnis
Head of Corporate Development

Redundancy and Redeployment Policy and Procedures

1.0 Introduction

- 1.1 It is the Council's aim, where possible, to maintain secure employment for its employees. However circumstances may arise where the organisation's requirements may lead to the need for a reduction in the number of staff employed or organisational changes that result in some employees being made redundant. The Redundancy and Redeployment Policy provides a procedure and guidance for managers to follow when the potential need to reduce staffing occurs. It ensures that employees are treated fairly and consistently, and that appropriate employee and trade union consultation takes place throughout the staffing reduction process.
- 1.2 This policy applies to all employees with service of 12 months or more, including those with fixed term contracts. To qualify for a redundancy payment an employee must have been continuously employed in local government for two or more years at the effective date of termination. Those employees who have less than 12 months service will be supported appropriately and informed of vacancies that arise.
- 1.3 The Council will be open and fair, and give regard to equality and consistency in treatment for all employees.
- 1.4 Where a post has been identified as being substantially altered, has disappeared or is one of a number of posts which will reduce as a result of organisational change, the employment status of the individual employee will be described as 'at risk'.

2.0 Decision making

- 2.1 Delegations for human resource decisions within Eastbourne Borough Council are as follows:
- Decision on principles of strategic direction or annual budgeting with HR implications lies with Cabinet;
 - Decision to dismiss by reason of Redundancy lies with the Chief Executive and those Officers nominated by him for this purpose.

Version Control

Version Number	Date	Review Date	Author	Reason for New Version
	July 2014		Human Resources	

3.0 **Consultation**

3.1 When there is a potential restructuring or redundancy situation, the relevant Senior Head of Service/Chief Officer will discuss matters confidentially in the first instance with the Chief Executive and Strategic Organisational Development Manager.

3.2 The Council will ensure that appropriate consultations are carried out with union representatives and individual employees in respect of restructuring and redundancy proposals. Consultation will commence at the earliest opportunity and will continue throughout the process.

3.3 **Collective consultation**

Consultation will begin in good time prior to the proposed changes taking place. The statutory minimum consultation periods for proposed redundancies will be observed. These are:

- Begin consultations at the earliest possible opportunity where the number of redundancies proposed is less than 20.
- Begin the consultation process at least 30 days before the first termination of employment takes place, where between 20 and 99 redundancies are proposed.
- Begin the consultation process at least 45 days before the first termination of employment, where the number of redundancies proposed is 100 or more.
- Submit an HR1 Form to the Redundancy Payments Service acting on behalf of the Secretary of State for Business Innovation and Skills where 20 or more redundancies are proposed

3.4 The council will disclose in writing to the trade union representatives the following information:

- The reasons for the proposals;
- The number and descriptions of the posts affected by the changes;
- The total number of posts affected;
- The proposed method of selecting the employees including the period over which termination of employment is to take effect.
- The proposed method of calculating the amount of any redundancy payments to be made.

- 3.5 The consultation will include consideration of any ways of avoiding the dismissals, reducing the number of employees to be dismissed, and mitigating the effects of dismissals.
- 3.6 The council will communicate plans for organisational change through briefings, team meetings, InSite (where appropriate), and Unison.

Corporate Management Team and service managers are responsible for ensuring that individuals and teams are provided with regular briefings and information about how the proposed changes affect them.

- 3.7 Affected employees, who are absent from work due to long term sickness, maternity/additional paternity/adoption leave, or on a secondment, will be included in the process of consultation.

4.0 **Briefing Cabinet**

- 4.1 During operation of the Redundancy and Redeployment Procedure, the Strategic Organisational Development Manager will brief Cabinet regularly on progress to ensure that members are fully briefed.
- 4.2 Briefings will include feedback from consultation, details of where work of the same or similar character is currently undertaken within the Council, information on the payments which could be made to the employees concerned and any other relevant facts.

5.0 **Measures to avoid compulsory redundancies**

- 5.1 The council will, wherever possible, take all reasonable steps to minimise compulsory redundancy including the following decisions or actions:
- Corporate Management Team will authorise all posts to be filled following review of a completed Recruitment Authorisation form.
 - Suspension of external recruitment to jobs of the same or similar character as those occupied by the employees affected, unless an offer has already been made to a 'preferred candidate'. These are roles into which the displaced employees could be deployed and may involve the employee undertaking specific training.
 - Heads of Service must consider those at risk of redundancy for any vacancy in their department prior to its advertisement outside the Council.

- If a Head of Service decides for any reason not to interview or appoint an employee at risk of redundancy to a vacant post, reasons should be provided to the Strategic Organisational Development Manager. They must be satisfied that the individual does not meet the person specification for the post and could not do so even with a reasonable period of training.
- The Corporate Management Team shall:-
 - review any overtime worked in areas where a reduction might create an opportunity for redeployment;
 - retain the displaced member of staff on a supernumerary basis (i.e. not in an established post) where a suitable vacancy is expected to arise within the next three months.
- Heads of Service will take all practicable steps to source appropriate work for the employees concerned by ceasing, wherever possible, to use consultants, contractors and agents engaged to do work of the same or similar character to that being undertaken by employees whose posts may become redundant.

6.0 **Individual consultation**

- 6.1 Individual consultation will take place as early as is reasonable in the process with employees placed at risk of redundancy.
- 6.2 The manager of the affected service and a member of the HR team will meet with individual employees to discuss the restructure and how proposed changes will affect the individual. At this point employees may be identified as being at risk of redundancy.
- 6.3 The meeting will provide an opportunity to hear the views of the employee; to answer questions and to discuss/explore alternatives to redundancy. The employee has the right to be accompanied at this meeting by a trade union representative or work colleague.
- 6.4 Any discussions will be confirmed in writing to formally advise the employee that they are at risk and copied to any appropriate Trade Union representative.
- 6.5 Individual employees or staff as a group can request to have further opportunities to meet with their line manager and/or HR to discuss their concerns or questions in relation to the restructure.
- 6.6 The employee will be advised that support will be provided, subject to the individual's needs. This may include:

- Coaching in job application and interview skills
- Being provided with regular copies of the council's current vacancy list
- Information about redundancy figures and, where appropriate, pension estimates
- Counselling

7.0 **Voluntary Redundancy**

- 7.1 The Council may, at its discretion and at times when the organisation is seeking to reduce staff numbers, examine whether there is scope to consider requests for voluntary redundancy.
- 7.2 The Head of Service or Chief Officer responsible for overseeing the changes will, in consultation with the Strategic Organisational Development Manager, identify the categories of employees from whom it is prepared to accept volunteers and inform these employees, setting out the mechanism for expressing interest and giving timescales.
- 7.3 In determining which employees are to be granted release on voluntary redundancy the Council will have regard to the following:-
- the need to maintain efficient and effective services;
 - the need to retain a balance of key experience and skills within services and across the workforce to meet future needs;
 - the financial implications of the release.

The Council reserves the right to refuse individual requests for voluntary redundancy.

- 7.4 For further information refer to the Voluntary Redundancy Procedure at Appendix B.
- ## 8.0 **Selection**
- 8.1 Where there are no alternatives to compulsory redundancy, the council in consultation with the union will consider the criteria to be used for selecting employees for redundancy.
- 8.2 There may be circumstances where selection will not be relevant such as where there is only one employee or where an entire group of employees are to be declared redundant.
- 8.3 The selection criteria may include: specific skills; essential qualifications; experience; work performance/standard of work; attendance record and timekeeping, discounting disability related absence; live disciplinary warnings; appraisal assessment against

core and management competencies; ability to undertake the duties and responsibilities of the posts which are retained.

- 8.4 The purpose of the criteria is to ensure that employees are fairly selected for redundancy. The aim of selection criteria will be to ensure the council retains a balanced and appropriately skilled workforce for the future which is able to meet customer and service needs.
- 8.5 Care will be taken to ensure that the selection process is not directly or indirectly discriminatory.

9.0 **Redeployment**

- 9.1 Employees have a shared responsibility with the council in seeking redeployment.

A record (Redeployment Register) of all staff, who have been identified as 'at risk', will be held by the HR team who will provide support and advice to individuals and line managers throughout this process. See Appendix A for details of this support.

Selection and appointment under the Redeployment Procedure provisions

- 9.2 A role will be considered same or similar if the new role is the same grade band and there is similarity in the nature of the tasks, level of responsibility and characteristics of the deleted role.
- 9.3 Displaced employees being considered for redeployment to a post of the same or similar character will be covered by the specific provisions of the redeployment procedure. They will be interviewed and considered for redeployment on their own merits, but *not in competition*, for such a vacancy.
- 9.4 Other permanent employees from within the department with the vacancy may apply at the same time but will only be offered the appointment if considered by the head of service to be demonstrably significantly more suitable.
- 9.5 If there are any uncertainties regarding a displaced employee's ability to carry out the duties of the post, trial periods of at least four weeks and no longer than six months should be used to assess the individual's suitability.
- 9.6 Any redeployed employee will be given appropriate training in the responsibilities of his or her new job. A job description for the post must be supplied to the employee. It is not to be expected that

they will be able to perform the full range of duties immediately. The criterion to be considered is whether it can be expected that an acceptable standard would be achieved within three months of appointment.

9.7 There may be occasions where a particular qualification, although normally required, should not be regarded a pre-condition of redeployment if the employee could be reasonably expected, within a minimum period of three months, to undertake the duties of the post to an acceptable standard. It may be reasonable to make it a condition of redeployment that the employee studies for a recognised qualification.

9.8 Any employee offered redeployment will be given a written offer stating:

- the type of work and job description;
- the related training necessary;
- the location and hours of work;
- the salary and other conditions of service,;
- the length of any trial period, (minimum of four weeks) allowing for related training to be undertaken;
- any other terms and conditions of employment relating specifically to the post into which they are being deployed.

9.9 If the offer of redeployment comes after the displaced employee has been given notice of dismissal, the employee must be given a trial period.

10.0 **Pay**

10.1 Redeployment to a 'same or similar' role will mean the new role is at the same grade and therefore the employee's pay will remain the same.

11.0 **Provisions outside the Redeployment Procedure**

11.1 Displaced employees will, at all times, be encouraged to apply for vacancies within Eastbourne Borough Council which interest them. Many of these will not be of the 'same or similar character' as the role from which they are displaced. Where they choose to do so, they will be considered in open competition alongside any other applicants and assessed, on their merits.

Corporate recruitment and selection standards and procedures will apply. If it is mutually agreed by the employer and the employee at risk of redundancy that accepting a role at a lower level is an appropriate way to mitigate the need for compulsory redundancy then pay protection up to a maximum of 2 years may apply. If there is not agreement then the employees pay will reduce to the

grade of the new role.

- 11.2 A displaced individual may choose not to be appointed to a vacancy as offered under paragraph 11.1 above. Where that vacancy is not of the same or similar character to the post from which they have been displaced, this decision will not affect any entitlement to redundancy payment.

12.0 **Restructuring process**

- 12.1 The following principles will be followed where service restructuring is taking place:

Slotting in

The council will identify within the new structure any posts which can be deemed as near equivalent posts. Employees will be assimilated where the majority of the job remains unchanged taking account of the level of responsibility, skills, competencies, tasks and terms and conditions of the new post are substantially the same as the current post and there is no other 'at risk' member of staff who qualifies for consideration by holding a broadly similar post. If there is more than one employee affected there will be ring fenced competition to determine who will be slotted in to the post.

Employees who are assimilated will not be served notice of redundancy and will not have a trial period.

12.2 **Restricted competition**

The council will identify any posts within the new structure which are open to restricted competition. These posts will be available to those staff affected by the restructuring in the first instance.

These will be posts where:

- It is a post which is new in content – the duties are substantially different from any current post
- A post carries increased responsibility
- Where more than one 'at risk' employee could be regarded as a suitable candidate

If, after following these steps, the posts remain unfilled recruitment will be handled in the normal way.

13.0 **Notice of Redundancy**

- 13.1 If no suitable alternative employment has been found then notice of redundancy will be issued in line with the employee's contract of employment. This will confirm the date at which employment with the council will cease.

13.2 No dismissal will take place until the consultation period has been completed.

14.0 **Redundancy Payments**

14.1 Any employee dismissed on the grounds of redundancy will be entitled to:

- a period of notice, depending upon their continuous local Government service; and
- if they have worked in Local Government for two years, a statutory redundancy payment
- and, subject to the signing of an appropriately formed settlement agreement, an additional sum based on the statutory redundancy payment formula. Such a payment will be based on actual week's pay and increased by a factor of 1.75 or a multiple as may be determined and published by the Council from time to time under its discretions.

15.0 **Appeals process**

15.1 An employee may appeal in writing against dismissal on grounds of redundancy to the relevant the Chief Officer/ Senior Head of Service within 10 working days of the letter formally confirming notice of redundancy. The appeal will be heard by the Council's Appeals Panel comprising three selected Members.

On receipt of an appeal the Chief Officer /Senior Head of Service will notify the Strategic Organisational Development Manager who will convene a meeting of the Appeals Panel within 10 working days.

The Panel will consider the case and determine whether or not to confirm the decision to make the employee redundant. The decision will be confirmed in writing to the employee and his or her representative within three working days.

The decision of the Appeals Panel is final.

Appendix A - Support available for employees covered by the provisions of the Redeployment Procedure

1.0 Introduction

1.1 When it is identified that an employee's role is likely to be deleted from the Council's structure this gives rise to a potential redundancy situation. If you are in a role affected as 'at risk' you will have access to a range of support, training and advice.

The support includes:

- Information about redundancy figures and, where appropriate, pension estimates
- Access to counselling
- Advice in finding alternative work including practical assistance with writing CVs and handling interviews
- Reasonable paid time off to find alternative work
- Training for alternative employment outside the Council

1.2 You may choose to be accompanied at meetings by a work colleague or union representative.

2.0 Support from the Senior Head of Service and your manager

2.1 The Senior Head of Service will confirm your admission to the Redeployment Register. He/she will be available to discuss the situation with you and will be working with your manager and the Human Resources team to identify alternative employment opportunities.

3.0 Support from the Human Resources Team

3.1 An HR Adviser will meet with you once you have been admitted to the Redeployment Register. The initial meeting will give you the opportunity to discuss the situation in confidence and talk about any issues or concerns that you have.

3.2 The HR Adviser will discuss any questions you may have about the process and will advise you about the financial implications of the situation. It will also be an opportunity to discuss potential job opportunities, internally or externally.

3.3 The HR Adviser will discuss your qualifications, skills, experience and areas of work in which you are interested. These details and your CV will then be held on record to refer to if internal vacancies occur. HR will review your CV and redeployment profile details against the person specification of any vacancy approved for recruitment, determining whether there is the potential for a redeployment into the vacancy.

- 3.4 The HR team will provide support and advice throughout the period you are on the Redeployment Register. Following the initial meeting, further meetings will be arranged based on individual needs.

The HR Adviser can provide advice on job search, CV presentation and self-marketing.

4.0 **Priority access to internal vacancies similar to your current role**

- 4.1 Where a vacant role is deemed to be “the same or similar” in nature or level to your current role, recruitment will be frozen whilst details of the role are discussed with you.

Where several displaced individuals are interested in the same redeployment opportunity, a selection process will be run against the specification for the post.

5.0 **Information relating to pension**

- 5.1 The Exchequer Manager is available to contact if you have a query related to your Local Government pension. You can request a private meeting if you would like to understand the pension information in more detail.

6.0 **Support from Unison**

- 6.1 As well as the support of the Senior Head of Service, your manager and the HR team, Unison stewards are also a source of information and advice if you are a member.

7.0 **Time off to job search**

- 7.1 You may be granted reasonable time off to look for alternative work. Examples include time off to attend interviews, time at work to undertake online job search or to complete applications for roles. You will need to agree the time with your manager.

8.0 **Counselling support**

- 8.1 If you find that you would like to speak with a counsellor in confidence about your situation at any point then this will be available to you. This is a confidential and independent service accessed through the HR Adviser. The HR team will obtain details of the Counsellor’s appointment availability and confirm the arrangements with you.

9.0 **Communication about other internal vacancies**

- 9.1 When a new vacancy occurs the Job Vacancies Bulletin will be updated by the HR team and circulated to all individuals on the Redeployment Register.

10.0 **Training**

- 10.1 If you identify a skills gap we may be able to provide training or source

a course depending on cost, relevance and timescales. An example is Excel/IT training.

Give some thought to potential training which may assist you in securing a role and let the HR Adviser know.

11.0 **Actions for you to take**

11.1 It is helpful prior to the initial meeting with the HR Adviser if you send through your CV if you already have one prepared. Alternatively, if you don't have a CV then prepare a summary of your career experience, outlining your qualifications and training courses undertaken and a short statement of your particular strengths and skills.

11.2 You are encouraged to look at vacancies arising within the Council on your own initiative.

If you wish to put yourself forward for an internal post that is not considered to be the same or similar to your existing post, then this will fall outside the protection of the Redeployment Procedure. This means that you would be invited to apply for it in the normal way and you would not have priority over other candidates.

11.3 You are also encouraged to look more widely and externally at potential employment opportunities which sit with your skills' set and interests.

Full details of Council vacancies in the area can be found advertised on the East Sussex County Council Website.

12.0 **Trial Period**

12.1 There is a statutory right to a trial period where an offer of redeployment is made during an employee's notice period and the employment is to commence at the end of the notice period. The trial period will be included in the offer letter.

12.2 A trial period may be extended beyond 4 weeks to enable retraining, where appropriate.

12.3 If you are redeployed and should either you or the Council find that the role is not suitable the arrangement can be ended by the giving of one week's notice on either side. If the trial period proves unsuccessful or unsatisfactory, the employee will revert to being 'at risk' of redundancy.

13.0 **Notice**

13.1 If no suitable alternative employment is identified then you will be issued notice. This will confirm the date at which your employment with the Council will cease. The period of notice to which you are entitled is whichever is the greater of either the contractual period in line with your

contract of employment or the statutory period shown below.

Period of continuous employment	Notice period
One month or more but less than two years	1 week
Two years or more but less than twelve years	1 week for each completed year of continuous employment
Twelve years or more	12 weeks

13.2 Throughout the notice period efforts to secure alternative work will continue to try to avoid the redundancy. The HR team will help you to identify any new vacancies or opportunities that may be suitable.

14.0 **Redundancy Payments' Modification Orders**

14.1 It may not be a redundancy if you secure a role with another Local Government employer within four weeks of employment with Eastbourne Borough Council ending.

If you receive an offer of employment from another authority or body covered by the Redundancy Payments' Modification Orders and the new employment will start within four weeks of the current employment finishing, you must inform the Authority as a redundancy payment may not apply in these circumstances. Please note that the four weeks referred to may be extended by a weekend, and if this is relevant to your situation, you are advised to seek further clarification from a member of the HR team.

15.0 **Pension**

15.1 Employees who are made redundant and who are aged 55 and over at the effective date of termination and who have Local Government Pension Scheme membership of at least 3 months, are able to access their pension benefits. Pension benefits will not be actuarially reduced because of early access in these circumstances.

16.0 **Entitlement to a redundancy payment**

16.1 All employees who are dismissed for reasons of redundancy and who have 2 years continuous service or more at the effective date of dismissal are entitled to a statutory redundancy payment.

The statutory redundancy payment is calculated according to age and length of service and is expressed as a number of weeks' pay.

The maximum statutory redundancy payment entitlement is for 30 weeks' pay which is currently paid at a maximum of £464 for 1 week's pay.

The statutory payment is calculated as follows.

- half a week's pay for each full year under age 22
- One week's pay for each full year of service age 22 or older, but under 41
- One and a half week's pay for each full year age 41 or older

The statutory limit on the amount of a week's pay is reviewed annually.

In the absence of a signed settlement agreement statutory redundancy limits apply.

17.0 **Settlement agreement**

17.1 If you are given formal notice that your employment is ending due to redundancy and you are not redeployed to an alternative post by the effective date, the Council has discretion to pay an enhanced severance payment, in excess of statute, which is subject to the signing of an appropriately formed settlement agreement. Details of the enhanced payment will be outlined in the severance payment letter you receive.

17.2 A settlement agreement is a legal document that sets out the arrangements for leaving and provides an agreed reference which will be used to respond to enquiries from potential future employers. In signing the settlement agreement you agree not to seek employment with us or other related bodies for 12 months, i.e. Wealden and Eastbourne Lifeline Limited, Eastbourne Homes limited.

17.3 If you are not redeployed into an alternative role during your final week with the organisation we will forward to you two copies of the draft settlement agreement and a proposed template reference. Eastbourne Borough Council will use the template reference as a base to respond to any potential future employer's request for references.

17.4 It is important that you obtain independent legal advice prior to signing the settlement agreement. Your legal adviser also signs the agreement to indicate that you have been briefed and given an opportunity to discuss the content and implications of your signature.

17.5 Employees who are members of a Trade Union are recommended to

seek advice from their Representatives prior to finalising a Settlement Agreement. Trade Unions can make arrangements for the appropriate advice to be provided regarding the signing of Settlement Agreements.

- 17.6 Employees have used local solicitors Stephen Rimmer LLP for independent legal advice in the past.
- 17.5 If you prefer to use a different legal adviser, the Council will fund that advice up to a limit of £250 plus VAT. You will need to take two copies of the settlement agreement with you to the meeting together with a copy of your contract of employment.

Appendix B - Voluntary Redundancy

1.0 Introduction

- 1.1 Where there is a need to reduce the number of employees, the Council may, at its discretion, take expressions of interest from volunteers for redundancy whose jobs could provide employment for employees who are on or may shortly be entering the Redeployment Register.
- 1.2 The Head of Service or Chief Officer responsible for overseeing the changes will, in consultation with the Strategic Organisational Development Manager, identify any such groups and inform these employees, setting out the mechanism for expressing interest in voluntary redundancy and giving timescales. Some posts may be excluded due to the Council's need to retain specific skills, knowledge and experience within a given service area.
- 1.3 Expressions of interest for voluntary redundancy will be invited by the start of the consultation period at the latest. There will be a fixed time period in which applications will be accepted.
- 1.4 The trade union (UNISON) will be advised by Human Resources of the groups of employees approached and of the number of expressions of interest subsequently received.
- 1.5 Employees who volunteer may be awarded the benefits of the Council's enhanced severance payment subject to the signing of an appropriately worded settlement agreement (See Appendix A (paragraph 17)). An individual estimate of benefits will be prepared for them based on an estimated end date. They will then be asked to confirm by a specified date whether they wish to proceed with an application or not.
- 1.6 HR collates all expressions of interest for voluntary redundancy which will be treated in confidence and explored. At this stage, the expression of interest will not form a binding agreement on either side.
- 1.7 In determining which employees are to be granted voluntary redundancy, the Council will have regard to the following:-
- the need to maintain efficient and effective services;
 - the need to retain a balance of key experience and skills across the workforce to meet future needs;
 - the financial implications of the release.

- 1.8 If the employee requesting redundancy is a member of the Local Government Pension Scheme and is aged 55 or over the Exchequer Manager will obtain an estimate of pension retirement benefits and the cost to the organisation of releasing pension benefits early.
- 1.9 The Council reserves the right to accept or reject applications for voluntary redundancy.
- 2.0 **Procedure**
Expressions of Interest for voluntary redundancy
- 2.1 If as an employee you wish to consider expressing interest in voluntary redundancy the first step is to request an estimate of the compensatory benefits which may be paid if voluntary redundancy is approved. Requests for an estimate based on current age and continuous service are made by emailing the human resources inbox in Outlook.
- 2.2 If, after obtaining an estimate you wish to pursue an expression of interest in voluntary redundancy, you should discuss this with your manager prior to completing section 1 of the request for voluntary redundancy form. After completion of section 1 of the form you should forward the request to your manager for them to complete sections 2 and 3.
- 2.3 The manager will be required to complete sections 2 and 3 of the request for voluntary redundancy form.
- 2.4 The manager should request the following from the Exchequer Manager to enable completion of section 3:
- potential severance payment costs
 - the capital cost of releasing pension early if the employee is a member of the Local Government Pension Scheme and age 55 or over,
 - the on-costs for the current role such as Employer National Insurance Contributions; Employer Pension costs; allowances
- 2.5 Once the request for voluntary redundancy form is fully completed the manager sends it to the Human Resources Outlook in-box.
- The HR team will acknowledge receipt of the form.
- 2.6 The expression will be reviewed by the relevant Senior Head of

Service in consultation with the Strategic Organisational Development Manager or nominated deputy.

- 2.7 By the end of the consultation period at the latest, the Head of Service will confirm to the volunteer(s), explaining whether they have been accepted or not for voluntary redundancy.
- 2.8 There is no right to appeal if an expression of interest for voluntary redundancy is declined.
- 2.9 If an individual is selected for voluntary redundancy he/she will have a final consultation meeting and a consideration period of no less than 5 working days prior to being issued with a notice of dismissal on grounds of redundancy.
- 2.10 Where an application is accepted, notice of redundancy will be issued confirming the redundancy payment and, if relevant, pension figures based on the confirmed leaving date.
- 2.11 Notice will be issued in line with the employee's contractual or statutory entitlement (whichever is the greater).

An employee will be expected to work their notice period. If the employee wishes to leave early, then it may be possible to agree an early release but he/she will waive the remainder of his/her notice period.

- 2.12 In exceptional circumstances, any offer of payment for voluntary redundancy may be withdrawn where an offer of suitable alternative employment is made and unreasonably refused by the employee prior to the date of termination.

3.0 **Severance payments**

3.1 **Statutory redundancy payment**

Statutory redundancy pay is based on an employee's age and length of continuous employment at the date of redundancy and is payable if an individual has worked for the employer for two years or more.

The statutory redundancy payment is calculated according to age and length of service and is expressed as a number of weeks pay.

The maximum statutory redundancy payment entitlement is for 30 weeks' pay which is currently paid at a maximum of £464 for 1 week's pay.

The statutory payment is calculated as follows:

- half a week's pay for each full year under age 22

- One week's pay for each full year of service age 22 or older, but under 41
- One and a half week's pay for each full year age 41 or older

The statutory limit on the amount of a week's pay is reviewed annually.

In the absence of a signed settlement agreement statutory redundancy limits apply.

3.2 **Enhanced severance payment**

Eastbourne Borough Council makes an enhanced severance payment conditional upon the signing of an appropriately formed settlement agreement. The sum is based on the statutory redundancy payment formula but is calculated on an actual week's pay and increased by a factor of 1.75 .

The enhanced severance payment is inclusive of the statutory redundancy payment.

3.3 Under the Council's agreed discretions, an individual can choose to put the difference between the 'redundancy calculation at actual week's pay' and the '1.75 times' sum into the Local Government pension scheme to increase pension instead of taking that proportion as a lump sum. If the employee chooses this option he/she must indicate the intention as soon as practicable and, under the regulations, this discretion must be exercised in advance of the final date of employment with us.

3.4 Certain termination payments may not be subject to tax if, in aggregate, they do not exceed £30,000. The taxable status of all termination payments will be determined in accordance with Inland Revenue guidelines.

4.0 **Access to Local Government Pension Scheme**

4.1 If the employee is age 55 or over and is member of the Local Government Pension Scheme, they will receive the pension benefits due to them in accordance with the scheme regulations.

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