

## Notice of Meeting

### Executive – Advisory Meeting

Councillor Bettison OBE (Chair),  
Councillor Dr Barnard (Vice-Chairman),  
Councillors D Birch, Brunel-Walker, Harrison, Mrs Hayes MBE,  
Heydon and Turrell

**Tuesday 8 February 2022, 5.00 pm**

**Online Only - MST**



### Agenda

*Recommendations arising from this meeting will be considered in accordance with the delegations approved by Council on 28 April 2021.*

Item	Description	Page
1.	<b>Apologies</b>	
2.	<b>Declarations of Interest</b>	
	<p>Members are asked to declare any Disclosable Pecuniary or Affected Interests in respect of any matter to be considered at this meeting.</p> <p>Any Member with a Disclosable Pecuniary Interest in a matter should withdraw from the meeting when the matter is under consideration and should notify the Democratic Services Officer in attendance that they are withdrawing as they have such an interest. If the Disclosable Pecuniary Interest is not entered on the register of Members interests the Monitoring Officer must be notified of the interest within 28 days.</p> <p>Any Member with an Affected Interest in a matter must disclose the interest to the meeting. There is no requirement to withdraw from the meeting when the interest is only an affected interest, but the Monitoring Officer should be notified of the interest, if not previously notified of it, within 28 days of the meeting.</p>	
3.	<b>Minutes</b>	5 - 6
	<p>To consider and approve the minutes of the meeting of the Executive held on 25 January 2022.</p> <p><b>Reporting:</b></p>	
4.	<b>Urgent Items of Business</b>	
	<p>Any other items which, pursuant to Section 100B(4)(b) of the Local Government Act 1972, the Chairman decides are urgent.</p>	

### **Executive Key Decisions**

The items listed below all relate to Key Executive decisions, unless stated otherwise below.

5.	<b>The Central and Eastern Berkshire Joint Minerals and Waste Plan (Submission version) – consultation on Main Modifications</b>	7 - 92
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### **EMERGENCY EVACUATION INSTRUCTIONS**

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	To seek approval to consult on Main Modifications to the Central and Eastern Berkshire Joint Minerals and Waste Plan (Submission version) and associated documents for a statutory period of at least six weeks.  <b>Reporting:</b> Andrew Hunter	
6.	<b>Capital Programme 2022/23</b>	93 - 106
	To recommend to Council the annual budget. <b>Reporting:</b> Stuart McKellar	
7.	<b>Revenue Budget 2022/23</b>	107 - 230
	To recommend to Council the annual budget <b>Reporting:</b> Stuart McKellar	

### **Exclusion of the Press and Public**

Agenda item 8 is supported by annexes containing exempt information as defined in Schedule 12A of the Local Government Act 1972. If the Committee wishes to discuss the content of these annexes in detail, it may choose to move the following resolution:

*That pursuant to Regulation 4 of the Local Authorities (Executive Arrangements) (Access to Information) Regulations 2012 and having regard to the public interest, members of the public and press be excluded from the meeting for the consideration of item 5/6 which involves the likely disclosure of exempt information under the following category of Schedule 12A of the Local Government Act 1972:*

- (3) *Information relating to the financial or business affairs of any particular person (including the authority holding that information).*

8.	<b>Review of Joint Venture Initial Business Plan 2020-2023</b>	231 - 276
	To review progress made by Bracknell Forest Cambium Partnership and to agree and changes to the business plan for 2022-2023. <b>Reporting:</b> Sarah Holman	
9.	<b>Exclusion of Public and Press</b>	
	To consider the following motion:  That pursuant to Regulation 4 of the Local Authorities (Executive Arrangements) (Access to Information) Regulations 2012 and having regard to the public interest, members of the public and press be excluded from the meeting for the consideration of item 10 which involves the likely disclosure of exempt information under the following category of Schedule 12A of the Local Government Act 1972:  (3) Information relating to the financial or business affairs of any particular person.  <i>NB: No representations have been received in response to the notice</i>	

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	<i>under regulation 5 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012</i>	
10.	<b>Short Breaks Services Procurement Plan</b>	277 - 296
	<p>To seek approval for the Strategic Procurement Plan for Short Breaks Play and Leisure Scheme. Bracknell Forest Council's current contract for Short Breaks Play and Leisure Scheme expires on the 31st of August 2022. The new contract duration will be an initial 2 years (1st September 2022 – 31st August 2024) with an option to extend for a further 3 years (1st of September 2022 – 31st of August 2027)</p> <p><b>Reporting:</b> Thom Wilson</p>	

Sound recording, photographing, filming and use of social media is permitted. Please contact Hannah Stevenson, 01344 352308, [hannah.stevenson@bracknell-forest.gov.uk](mailto:hannah.stevenson@bracknell-forest.gov.uk), so that any special arrangements can be made.

Published: 31 January 2022

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**EXECUTIVE – ADVISORY MEETING  
25 JANUARY 2022  
5.03 - 5.35 PM**

**Present:**

Councillors Bettison OBE (Chair), Dr Barnard (Vice-Chairman), D Birch, Brunel-Walker, Harrison, Mrs Hayes MBE and Heydon

**220. Declarations of Interest**

There were no declarations of interest.

**221. Minutes**

**RESOLVED** that the minutes of the meeting of the Executive on 14 December 2021 together with the accompanying decision records be confirmed as a correct record and signed by the Leader.

**Executive Decisions**

The following minutes summarise the recommendations made to executive members:

**222. Homelessness and Rough Sleeping Strategy**

**RECOMMENDED** to the Executive Member for Adult Services, Health and Housing that they:

1. approve the Homelessness and Rough Sleeping Strategy 2021-26 which has been finalised following stakeholder consultation
2. delegate the development of a detailed action plan to the Assistant Director of Early Help and Communities, working with partners in the new Homelessness Forum

**223. Temporary Accommodation Housing Compliance, Void and Reactive Maintenance Contract**

**RECOMMENDED** to the Executive Member for Adult Services, Health and Housing that they:

1. The Procurement Plan for the appointment of a contractor to provide a Temporary Accommodation housing Compliance, void and reactive maintenance contract is approved.
2. To delegate the award of the contract to the Executive Member for Adult Services, Health and Housing

**224. Exclusion of Public and Press**

**RESOLVED** that pursuant to Regulation 21 of the Local Authorities (Executive Arrangements) (Access to Information) Regulations 2000, members of the public and

press be excluded from the meeting for the consideration of item 8 which involves the likely disclosure of exempt information under the following category of Schedule 12A of the Local Government Act 1972:

- (3) Information relating to the financial or business affairs of any particular person (including the authority).

225. **Bridgewell Supported Living**

**RECOMMENDED** to the Executive Member for Adult Services, Health and Housing that they:

1. Approve funding of £0.095m as detailed in paragraph 5.22 for detailed design fees to take forward a proposal to build a new, bespoke facility with 20 self-contained units on the Bridgewell site to enable people with learning disabilities to live independently in shared accommodation, which is estimated to save around £0.975m in revenue costs over the first 5 years of operation.
2. Note the specific requirements in paragraphs 5.23 – 5.27 pertaining to the potential grant from Homes England and agree to further explore the Homes England grant requirements for Option B (Council to build and thereafter appoint the providers) or Option C (To appoint a Registered Provider to build and operate) with a view to improving the financial position modelled in the business case attached as Appendix 2.
3. Approve the timetable set out in paragraph 5.28.

**CHAIRMAN**

To: **Executive**  
**8<sup>th</sup> February 2022**

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## **Proposed Main Modifications to the Central and Eastern Berkshire Joint Minerals and Waste Local Plan (Submission Version)**

**Director of Place, Planning and Regeneration**

### **1 Purpose of Report**

- 1.1 The Central and Eastern Berkshire Joint Minerals and Waste Local Plan (CEBJMWP), was submitted to the Secretary of State on 25<sup>th</sup> February 2021. This marked the beginning of the examination phase. Public hearings were held in September and October 2021.
- 1.2 During the examination process, a number of Main Modifications have been identified that are considered necessary to make the plan sound and legally compliant. These Main Modifications (attached as Appendix 1). need to be subject to consultation They are supported by a Habitats Regulation Assessment (HRA) Addendum, Sustainability Appraisal (incorporating Strategic Environmental Assessment) (SA/SEA) Addendum and Revised Policies Map.
- 1.3 A further category of proposed changes termed Additional (Minor) Modifications have also been produced which cover factual updates, textual corrections and points of clarification. These are being published for information as there is only a legal requirement to consult on the Main Modifications.
- 1.4 It is suggested that the Proposed Main Modifications and supporting documents be published for consultation for a six week period during February and March 2022, subject to the final agreement of the Inspectors.

### **2 Recommendation(s)**

- 2.1 **That the Proposed Main Modifications (attached as Appendix 1) to the Central and Eastern Berkshire Joint Minerals and Waste Local Plan (Submission version), Policies Map and supporting documents together with the schedule of Additional Modifications be approved.**
- 2.2 **That consultation on the Proposed Main Modifications (attached as Appendix 1) to the Central and Eastern Berkshire Joint Minerals and Waste Local Plan (Submission version), Policies Map and supporting documents for a period of at least six weeks be approved.**
- 2.3 **That the Executive Director Place Planning and Regeneration in consultation with the Executive Member for Planning and Transport agree any further changes to the Proposed Main Modifications that are recommended by the Inspectors, prior to public consultation.**

### **3 Reasons for Recommendation(S)**

- 3.1 As part of the examination process, the Inspectors must judge whether the CEBJMWP is 'sound' as set out in paragraph 35 of the National Planning Policy Framework 2021 (positively prepared, justified, effective and consistent with national policy). It is now clear that Main Modifications are required in order to make the the plan sound and ultimately ensure that the Council has an up to date and robust planning framework to guide development which reflects current national policy and guidance.
- 3.2 All Proposed Main Modifications and associated SA/SEA and HRA documents must be subject to public consultation before the Inspectors can make recommendations on them. Whilst the the Policies Map is not a development plan document, it illustrates geographically the application of policies in the plan. As certain proposed main modifications have geographical consequences, it is necessary to draw the proposed change to what is shown on the Policies Map. To ensure fairness, such proposed changes need to be subject to consultation alongside the Proposed Main Modifications.

#### **4 Alternative Options Considered**

- 4.1 The alternative options are to:
- (i) reject some or all of the identified Proposed Main Modifications to the plan; or
  - (ii) suggest different or more wide-ranging modifications, beyond those required for soundness.
- 4.2 The result of option (i) would almost certainly be that the Inspectors would find the plan unsound and recommend non-adoption of the plan. In practice, the Authorities would be asked to consider withdrawing the plan before any such recommendation was made. This would mean reliance on policies in existing documents that are out of date, making it difficult to resist inappropriate development, and potentially resulting in planning by appeal.
- 4.3 Option (ii) would carry the significant risk of the Inspectors needing to re-open the hearings. As well as the resource and time implications, it is not possible to guarantee that different proposed modifications would result in a sound plan. This could result in further delays to the process, leaving the Authorities without up to date policies for an extended period.

#### **5 Supporting Information**

- 5.1 The Unitary Authorities in Berkshire have responsibility for planning the future production of minerals and the management of waste disposal within the Berkshire area. Minerals and waste is an area of planning which is strategic in nature and as such is better planned on a larger geography than on an individual unitary authority basis. As such, the Royal Borough of Windsor and Maidenhead (RBWM), Wokingham Borough Council (WBC), Bracknell Forest Council (BFC) and Reading Borough Council (RBC) are aiming to produce a Central and Eastern Berkshire Joint Minerals and Waste Plan (CEBJMWP). The new plan will provide an effective and up to date planning strategy and policies for the supply of minerals and management of waste in the area, consistent with current national legislation, planning policy and guidance.
- 5.2 The production of the CEBJMWP began in 2016 with the approval by the four Authorities of joint working arrangements and the decision to commission Hampshire Services of Hampshire County Council (HCC) to produce the plan. HCC is the

Minerals and Waste Authority for Hampshire and has a dedicated in-house team of specialist planners.

- 5.3 Various consultations and ‘calls for sites’ have taken place as part of the plan preparation process. These are summarised below:
- ‘Issues and Options’ consultation to gather technical information and confirm the evidence base (Summer 2017);
  - Draft Plan consultation setting out the proposed approach for the Joint Minerals and Waste Plan (Summer/Autumn 2018);
  - Bray Quarry extension consultation (Summer 2019);
  - Focussed consultation on criteria for defining an ‘Area of Search’ for sand and gravel provision, two new sites for sand and gravel (Land west of Basingstoke Road, Spencers Wood in Wokingham Borough and land between Horton Brook and Poyle Quarry in the Royal Borough of Windsor and Maidenhead), and a possible policy on past performance of minerals and waste operators (Spring of 2020).
  - Various ‘calls for sites’ for minerals and waste uses due to the limited number of site options (Spring 2017, Autumn 2017, Winter 2018/19 and Autumn 2019).
  - Regulation 19 consultation on the Proposed Submission Draft of the CEBJMWP, (September and October 2020).
- 5.4 Following the final consultation stage, the plan was submitted to the Secretary of State on 25<sup>th</sup> February 2021. This marked the beginning of the examination phase Rachael Bust was appointed as the Lead Inspector, assisted by Nicholas Palmer. Their role is to assess whether the plan has been prepared in accordance with legal and procedural requirements, and, whether or not it is sound. Matters, Issues and Questions were published in August 2021 and public hearings were held in Maidenhead Town Hall during September and October 2021.
- 5.5 During the examination process, a number of Main Modifications have been identified by the Authorities, representors and the Inspectors that are considered necessary to make the plan sound and legally compliant. These have been assessed to establish whether or not there are any consequences for the SA/SEA and HRA. Furthermore, any necessary proposed changes to what is shown on the Submission Policies Map have been drawn up as if the geographical illustration of a policy is flawed, the policy will be unsound.
- 5.6 There is now a need for the Authorities to consult on the Proposed Main Modifications, Policies Map and supporting documents before the Inspectors can make recommendations on them. The nature and duration of the consultation must reflect held at the Regulation 19 stage. This means that it should last at least six weeks and that documents must be made available to view on the Council’s website with paper copies being made available at certain local libraries, subject to guidance in place at that time regarding rules relating to the Covid 19 Pandemic.
- 5.7 A schedule of the Proposed Main Modifications is attached as Appendix 1. Many of these represent quite small changes to wording, but there are some more significant changes that are summarised below.

- To reflect revised wording and references in the National Planning Policy Framework 2021 (NPPF) and the content of the Environment Act 2021.
  - To clarify the suitability of minerals and waste development in the Green Belt.
  - To ensure that the treatment of historic assets is consistent with the NPPF.
  - To clarify what restoration information is required in the restoration of minerals and waste developments.
  - To ensure that minerals and waste development in areas at risk of flooding is assessed in accordance with national policy and planning guidance.
  - To change the focus of policy DM15 from considering the past performance of an operator to issues that have arisen with specific minerals or waste sites.
  - To clarify the likely scale of imports of sand and gravel from outside the plan area.
  - To clarify the application of the minerals safeguarding areas.
  - To amend the wording of some indicators so that they provide a better indication of policy performance.
  - To revise/clarify various requirements for individual allocations, particularly with reference to flood risk and the Green Belt. This also includes the removal of two of the industrial areas identified as preferred areas for waste management facilities due to flood risk.
- 5.8 The Authorities have also compiled a list of Additional (Minor) Modifications which cover factual updates, textual corrections and points of clarification. These will not be considered by the Inspectors as they are not considered to affect the soundness of the CEBJMWP. They are being published for information.
- 5.9 Consultation on the Proposed Main Modifications (without prejudice to the Inspectors' final conclusions) is planned to take place during February and March 2022. It will be concerned with the Proposed Main Modifications only, and not the remainder of the plan. At the time of writing the Proposed Main Modifications are awaiting final comment from the Planning Inspectors. Once received there may be some further amendments to the modifications set out in Appendix 1. Depending upon when these are received the delegation set out at Para 2.3 may or may not be required.
- 5.10 Following the consultation, the Inspectors will consider all representations received before finalising the examination report and the schedule of recommended Main Modifications to the CEBJMWP. Further hearing sessions are not usually held, unless the Inspectors consider them essential to deal with substantive issues raised in the representations, or to ensure fairness.
- 5.11 The final report will summarise the outcome of the examination and, where appropriate, the principal changes to the plan made by the Main Modifications and why these are necessary. Assuming incorporation, the CEBJMWP can then proceed to adoption.

## **6 Consultation and Other Considerations**

### Legal Advice

- 6.1 Local plans are produced under the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).. Under Section 20 (7C) of the Act, an Inspector can recommend main modifications, if requested to do so by a local planning authority. Such a request was included in the Council's resolution to submit the CEBJMWP on

22nd July 2020. Regulations 24 and 25 cover the process of examination and publication of an Inspector's Report.

#### Financial Advice

- 6.2 The cost of preparing the CEBJMWP is being shared equally amongst the four commissioning authorities. The budget for this project was agreed by Council at £61k per annum and to date £244k of costs have been incurred.. This is intended to include the costs of the examination, and will cover the costs of preparing and consulting on the Proposed Main Modifications attached as Appendix 1 to this report. However, the cost of the examination will not be known in full until the Planning Inspectorate has produced a final invoice and will depend on the length and complexity of the examination. The budget requirements for the Local Development Framework are assessed each year and the budget amended accordingly through the commitment process, at this point it is assumed that sufficient budget is available to cover costs.

#### Other Consultation Responses

- 6.3 Responses to the Proposed Submission Version of the CEBJMWP have been taken into account in compiling the list of Proposed Main Modifications. Consultation at this stage is statutory; it will be undertaken with a range of stakeholders, including general and specific consultation bodies, landowners, consultants, developers, minerals and waste operators and Town and Parish Councils. The front page of the Council's web page will include notification of the publication of the Proposed Main Modifications . Once the consultation has closed representations received will be passed to the Inspectors who will consider the content.

#### Equalities Impact Assessment

- 6.4 The Scoping Assessment, included at Appendix 2 identifies that an Equality Impact Assessment (EqIA) is not relevant to this consultation. A full EqIA is not therefore required.

#### Strategic Risk Management Issues

- 6.5 There are no direct financial risks associated with the report.

#### Climate Change Implications

- 6.6 The Proposed Main Modifications to the CEBJMWP has been subject to Sustainability Appraisal, which assesses the effect of the plan and proposals on environmental, social and economic objectives, and is a statutory requirement of plan making. The Sustainability Appraisal Addendum, which will be published alongside the Proposed Main Modifications, has identified that the modified policies will have either neutral or positive effects on the identified sustainability objectives, which cover environmental objectives relating to biodiversity, water quality, landscape and heritage, ground conditions, air quality, emissions/climate change and flood risk.

#### Background Papers

- Planning and Compulsory Purchase Act 2004
- The Town and Country Planning (Local Planning) (England) Regulations 2012
- National Planning Policy Framework, 2021  
[National Planning Policy Framework \(\[publishing.service.gov.uk\]\(https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/91212/nppf-2021.pdf\)\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/91212/nppf-2021.pdf)
- Proposed Submission Draft Central and Eastern Berkshire Joint Minerals and Waste Plan (2020) and Policies Map (see web link below)
- Environmental Report Sustainability Appraisal/Strategic Environmental Assessment Main Modifications addendum November 2021 (see web link below)

- Habitats Regulation Assessment Addendum December 2021 ((see web link below)
- A wide range of background information is available on [Examination Library | Hampshire County Council \(hants.gov.uk\)](https://www.hants.gov.uk/examination-library)

Contact for further information

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**Central and Eastern Berkshire**

**Joint Minerals & Waste Plan**

# **Schedule of Proposed Main Modifications**

Examination Library Reference: MD03

1 December 2021



[www.rbwm.gov.uk](http://www.rbwm.gov.uk)



**Prepared by Hampshire Services**  
Hampshire County Council  
[www.hants.gov.uk/sharedexpertise](http://www.hants.gov.uk/sharedexpertise)



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## 1. Introduction

- 1.1 Bracknell Forest Council, Reading Borough Council, the Royal Borough of Windsor and Maidenhead, and Wokingham Borough Council (collectively referred to as the 'Central & Eastern Berkshire Authorities') are working in partnership to produce a Joint Minerals and Waste Plan (JMWP/ 'the Plan') which will guide minerals and waste decision-making in the Plan area.
- 1.2 This document sets out main (MM) modifications to be applied to the Submission version of the Plan. Proposed modifications were discussed at the examination hearings 28-30 September 2021 and 12 October 2021.
- 1.3 Modifications are presented in the following ways;
  - deleted text is struck through i.e. ~~deleted~~; and
  - new text is shown as bold and underlined i.e. **new text**.
- 1.4 The main modifications are subject to public consultation. Any responses received will be given to the Inspectors for consideration.
- 1.5 Where relevant, reference has been made to updated evidence base documents which are available on the Examination Library. However, this is for information purposes and the documents are not subject to consultation.

## 2. Schedule of proposed Main Modifications

Text to be inserted is shown **bold and underlined**.

Text to be deleted is shown ~~struck through~~.

Ref.	Policy / Para.	Page	Proposed modification	Justification
MM1	1.9	3	<p>The Joint Minerals &amp; Waste Plan will need to accord with current planning policy and guidance on minerals and waste. The National Planning Policy Framework (NPPF) was published in 2012 with the accompanying National Planning Practice Guidance<sup>2</sup> launched in 2014 as a live document, updated as necessary by the Government. The NPPF was subsequently revised in 2018, <b><u>2019</u></b> and <b><u>2021</u></b><del>2019</del><sup>3</sup>. The Waste Management Plan for England<sup>4</sup> was published in December 2013, followed by the National Planning Policy for Waste<sup>5</sup> which was published in October 2014. The 25 Year Environment Plan<sup>6</sup> was published in 2018 and sets out Government action to help the natural world regain and retain good health. A Resources and Waste Strategy for England was also published in December 2018<sup>7</sup>. The Strategy seeks to preserve material resources by minimising waste, promoting resource efficiency, and encouraging a move towards a circular economy.</p> <p><sup>3</sup> National Planning policy Framework - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/840197/NPPF_Feb_2019_revised.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/840197/NPPF_Feb_2019_revised.pdf</a> <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf</a></p>	NPPF 2021 Update
MM2	1.20	6	<p>The NPPF<sup>24</sup> requires that Local Plans are reviewed at least every five years from the year of adoption in order to take into account changing circumstances to the local area and national policy. The review should decide whether the</p>	NPPF 2021 Update

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p>policies need updating and if not, the reasons for this decision must be published.</p> <p><sup>24</sup> National Planning Policy Framework (Para. 33) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a> <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF July 2021.pdf</a></p>	
MM3	3.16	16	<p><b><u>xii. Address both the causes of climate change and seek ways to mitigate and adapt to its potential effects.</u></b></p>	To ensure alignment between the Spatial Strategy and the Vision and Strategic Objectives.
MM4	Policy DM 2 / 5.10 & 5.11	22	<p>It is a national planning objective that planning plays a key role in helping to shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and improving resilience; encouraging the reuse of existing resources, including the conversion of existing buildings; and supporting the delivery of renewable and low carbon energy and associated infrastructure<sup>30</sup>.</p> <p>National planning policy also states that '<b><u>Plans should take a proactive approach to mitigating and adapting to climate change</u></b> local planning authorities should adopt proactive strategies to mitigate and adapt to climate change'<sup>31</sup>. This should include taking account of the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes as well as the risk of overheating from rising temperatures<sup>32</sup>.</p> <p><sup>30</sup> National Planning Policy Framework (Para. 152-148): <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a></p>	NPPF 2021 Update

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p><del>le/779764/</del>  NPPF_Feb_2019_web.pdf <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf</a></p> <p><sup>31</sup>National Planning Policy Framework (Para. <u>153</u>449)</p> <p><sup>32</sup>National Planning Policy Framework (Para. <u>153</u>449)</p>	
MM5	Policy DM3 / 5.19 & 5.20	25	<p>National planning policy protects biodiversity overall, as well as important habitats and species, requiring local authorities to ‘distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value’ and ‘take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries’<sup>34</sup> .</p> <p>The Environment Act<sup>35</sup> requires that development achieves at least a 10% net gain in value for biodiversity and that developers must submit a ‘biodiversity gain plan’ with a planning application. Furthermore, the Act requires that Local Nature Recovery Strategies (LNRS) to be prepared by locally appointed ‘responsible authorities’<sup>36</sup> to guide delivery of biodiversity net gain and other nature recovery measures by helping developers and planning authorities avoid the most valuable existing habitat and focus habitat creation or improvement where it will achieve the greatest benefit.</p> <p><sup>34</sup>National Planning Policy Framework <del>2021</del>2019 (Para. <u>175</u>474)</p> <p><sup>35</sup> <del>Environment Bill currently going through Parliament</del> <b>Environment Act 2021</b> - <a href="https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted">https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted</a></p>	NPPF 2021 Update and Enactment of Environment Bill

Ref.	Policy / Para.	Page	Proposed modification	Justification
MM6	Policy DM3 / 5.24 & 5.25	28	<p>National planning policy is clear that development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed “clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest”<sup>37</sup>.</p> <p>Similarly, national planning policy requires that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) be refused, unless there are “wholly exceptional reasons”<sup>38</sup> and a suitable compensation strategy exists”<sup>39</sup>.</p> <p><sup>37</sup>National Planning Policy Framework (NPPF) <b>2021 (Para 180(b))</b><del>2019 (Para 175(b))</del>.</p> <p><sup>38</sup>For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat</p> <p><sup>39</sup> National Planning Policy Framework (NPPF) <b>2021 (Para 180(c))</b><del>2019 (Para 175(c))</del></p>	NPPF 2021 Update
MM7	Policy DM4 / 5.33	31	<p>Central and Eastern Berkshire contains a diverse range of landscapes. National planning policy requires that ‘great weight is <b>should be</b> given to conserving <b>and enhancing</b> landscape and scenic beauty in National Parks, <b>the Broads</b> and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues’<sup>40</sup>.</p> <p><sup>40</sup>National Planning Policy Framework (Para. <b>176</b><del>172</del>) - <a href="https://www.gov.uk/government/publications/nationalplanning-policy-framework-2">https://www.gov.uk/government/publications/nationalplanning-policy-framework-2</a></p>	NPPF 2021 Update



Ref.	Policy / Para.	Page	Proposed modification	Justification
MM8	Policy DM4	31	<p><b><u>1. Development which affects the setting of an Area of Outstanding Natural Beauty (AONB) should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.</u></b></p> <p><b><u>2.</u></b> 4. Development <b>Proposals</b> which affects the setting of an Area of Outstanding Natural Beauty (AONB) will be accompanied by a Landscape and Visual Impact Assessment that demonstrates that there is no detrimental impact on the natural beauty of the North Wessex Downs or Chilterns AONBs in terms of scale, design, layout or location, that cannot be effectively mitigated.</p>	To address changes to Para. 172 of NPPF 2019, reflected in Para. 176 of NPPF 2021.
MM9	Policy DM5 / 5.40	33	Landscapes outside designated areas and sites are highly valued, and it is important to respect their special qualities <b><u>intrinsic character and beauty</u></b> . Minerals and waste developments, even though they may be temporary, can have a negative landscape and visual impact on residents, visitors, users of publicly accessible land, rights of way and roads	Text amended to reflect Para. 174 of NPPF 2021.
MM10	Policy DM5	33	<p>Policy DM5 Protection of the Countryside</p> <p>1. Minerals and waste development in the open countryside will only be permitted where:</p> <p>a. It is a <del>time-limited</del> mineral extraction or <b><u>time-limited</u></b> related development; or</p> <p><b><u>b. the nature of the development is related to countryside activities or requires an isolated location;</u></b></p>	Text amended to reflect Para. 174 of NPPF 2021, improve the application of the Policy and clarify the time-limited development.

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p><del>bc.</del> The development provides a suitable reuse of previously developed land; or</p> <p><del>ed.</del> The development is within redundant farm or forestry buildings and their curtilages or hard standings.</p> <p>2. Where appropriate and applicable, development in the countryside will be expected to:</p> <p><del>a. m</del><b>Meet the highest standards of design, operation and restoration; including being subject to a requirement that it is restored</b></p> <p><b><u>b. consider the intrinsic character and beauty of the landscape which would be determined by the relevant Local Character Assessment;</u></b> <del>in in particular;</del></p> <p><b><u>c. ensure any</u></b> the network of statutory and permissive countryside access routes <del>should be protected, and where possible, enhanced;</del> <b>and</b></p> <p><b><u>d. be subject to the requirement that it is restored in</u></b> the event it is no longer required for minerals and waste use.</p>	
MM11	Policy DM6 / 5.50	35	<p>The eastern part of the Plan area is situated within the Metropolitan Green Belt around London (see Key Diagram). The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence<sup>42</sup>.</p> <p><sup>42</sup> National Planning Policy Framework (Para. <b>137</b>133) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/</a></p>	NPPF 2021 Update

Ref.	Policy / Para.	Page	Proposed modification	Justification
			NPPF_Feb_2019_web.pdf <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF July 2021.pdf</a>	
MM12	Policy DM6 / 5.52	35	<p>There is a presumption against inappropriate development within the Green Belt. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances<sup>43</sup>.</p> <p><sup>43</sup> National Planning Policy Framework (Para. <del>147</del>143)</p>	NPPF 2021 Update
MM13	DM6	35	<p>Policy DM6 Green Belt</p> <p>1. Proposals for <del>minerals and waste</del> development within the Metropolitan Green Belt will be carefully assessed for their effect on the objectives and purposes for which the designation has been made. High priority will be given to preservation of the openness of the Green Belt.</p> <p><b><u>2. Mineral extraction, which is not inappropriate development in a Green Belt, will be permitted where the impact of associated infrastructure has been taken into account and, where required, suitable mitigation measures are provided to prevent conflict with the objectives and purposes of the designation.</u></b></p> <p><del>23. Where the proposals do not conflict with the preservation of the openness of the Green Belt, w</del> <b><u>Waste management facilities, including aggregate recycling facilities, will be permitted where the proposal is not inappropriate development and where it can be demonstrated that:</u></b></p> <p><b><u>a. the proposals do not conflict with the preservation of the openness of the Green Belt; or</u></b></p>	<p>To clarify exceptions are set out in the NPPF which could be applied to waste management proposals in the Green Belt in certain circumstances.</p> <p>To clarify that mineral extraction is not inappropriate development in a Green Belt.</p> <p>To split minerals and waste processes into separate criteria and review associated bullet points.</p>

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p><b><u>b. suitable mitigation is provided to ensure the development would not cause harm to the objectives and purposes of the Green Belt; and</u></b></p> <ul style="list-style-type: none"> <li>• <del>that the site is the most suitable location in relation to arisings and recycle markets;</del></li> <li>• <u>i.</u> there are no appropriate sites outside the Green Belt that could fulfil the same role; and</li> </ul> <p><b><u>ii. the site is the most suitable location in relation to arisings and recycle markets.</u></b></p> <ul style="list-style-type: none"> <li>• <del>that suitable mitigation is provided to ensure the development would not cause harm to the objectives and purposes of the Green Belt.</del></li> </ul>	
MM14	Policy DM6 / 5.55	36	<p>National planning policy<sup>44</sup> states that minerals extraction, engineering operations and the re-use of buildings provided that the buildings are of permanent and substantial construction are not inappropriate development in the Green Belt provided that they preserve the openness of the Green Belt and proposals do not conflict with the purpose of including land in the Green Belt.</p> <p><sup>44</sup> National Planning Policy Framework (Para. <u>150</u>146) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf</a></p>	NPPF 2021 Update
MM15	Policy DM7 / 5.63	38	<p>National planning policy identifies the conservation of such heritage assets as one of the core land-use planning principles that underpin both plan-making and decision-taking; it states that heritage assets should be conserved in a</p>	NPPF 2021 Update

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p>manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life by today's and future generations<sup>45</sup></p> <p><sup>45</sup> National Planning Policy Framework (Para. <b>189</b>184) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF July 2021.pdf</a></p>	
MM16	Policy DM7	39	<p>Policy DM7 Conserving the Historic Environment</p> <p>1. <b><u>Some designated heritage assets such as Scheduled Monuments, Listed Grade 1 buildings and Registered Parks are of national importance; other grades of listed building and locally recognised heritage assets may be of regional or local importance. Non-designated heritage assets, usually recorded on the Historic Environment Record but sometimes encountered for the first time during preliminary survey, may be of national, regional, or local importance according to the weight given to them within expert advice.</u></b></p> <p>4. <b><u>2.</u></b> Proposals for minerals and waste developments will be required to protect, conserve and where possible enhance the historic environment, and the character, setting and special interest of heritage assets, whether designated or undesignated <b><u>non-designated</u></b>.</p> <p>2. Harm will only be allowed where the public benefit of development clearly and convincingly outweighs the significance of the heritage assets, and where the development cannot be delivered in a way that does not cause harm.</p> <p>3. Any planning application <b><u>Proposals</u></b> should be supported by an assessment of the significance of heritage assets <b><u>including its setting</u></b>, both present and</p>	Additional text to clarify the relative importance of historic assets to support National Policy and to outline the public benefit test.

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p>predicted, and the impact of development on them. Where appropriate, this should be informed by the results of technical studies, and field evaluation <b>and other evidence</b>. <b>For mineral proposals this should</b> to establish the potential for archaeological remains within the overburden and the mineral body itself.</p> <p><b><u>4. Proposals that would cause substantial harm to, or loss of, a designated heritage asset and its significance including its setting, will be required to set out a clear and convincing justification as to why that harm is considered acceptable on the basis of achieving substantial public benefits that outweigh that harm or loss, or where all the specific circumstances in the NPPF apply. Proposals will not be supported where this cannot be demonstrated.</u></b></p> <p><b><u>5. Proposals that cause less than substantial harm to the significance of a designated heritage asset will be required to weigh the level of harm against the public benefits that may be gained by the proposal including securing its optimum viable use.</u></b></p> <p><b><u>6. Proposals which affect the significance of a non-designated heritage asset should be properly considered, weighing the direct and indirect affects upon the heritage asset.</u></b></p> <p><b><u>7. When there is a clear and convincing justification that the public benefits of development outweigh the harm to, or loss of, a significance of the designated heritage assets and its significance including its setting harm to, or loss to heritage assets would unavoidably occur, mitigation of that harm, should be secured, and a balanced judgement taken regarding mitigation where non-designated heritage assets are impacted. This should include including archaeological work ahead of or during</u></b></p>	

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p>development, <del>should be</del> <b><u>the recording of designated and non-designated heritage assets, and protection, conservation, enhancement or reinstatement of a heritage asset's setting, as appropriate.</u></b></p> <p><b><u>8. Evidence and results of archaeological excavation, field evaluations, technical studies and other recordings should be made publicly accessible</u></b> (including depositing the results in a public archive <b><u>and Historic Environmental Record</u></b>).</p>	
MM17	Policy DM8	42	<p>Policy DM8 Restoration of Minerals and Waste Developments</p> <p>1. Planning permission for minerals extraction and temporary waste management development will be granted only where satisfactory provision has been made for high standards of restoration and aftercare such that the intended after-use of the site is achieved in a timely manner, including where necessary for its long-term management.</p> <p>2. The restoration of minerals and waste developments should reinforce or enhance the quality and character of the local area and should contribute to the delivery of local objectives for biodiversity, landscape character, historic environment, <b><u>flood risk management</u></b> or community use where these are consistent with the Development Plan and national policies and guidance.</p> <p>3. <b><u>Proposals for all mineral extraction and landfill sites must be accompanied by a restoration and aftercare scheme and</u></b> <del>The restoration of mineral extraction and landfill sites should be phased throughout the life of the development.</del></p>	To provide sufficient clarity in the policy on what restoration information is required.

Ref.	Policy / Para.	Page	Proposed modification	Justification
MM18	Policy DM10 / 5.96	48	<p>Minerals and waste development can have significant impacts on flooding. National planning policy on flooding <b>states “Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”</b> aims to ‘steer inappropriate new development to areas with the lowest probability of flooding’<sup>53</sup></p> <p><sup>53</sup>National Planning Policy Framework (Para <b>159</b>158) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a> <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF July 2021.pdf</a></p>	NPPF 2021 Update
MM19	Policy DM10	48	<p>1. Minerals and waste development in areas at risk of flooding should:</p> <p>a. Apply the <b>sequential approach which involves applying the</b> sequential test, <b>and if needed the</b> exception test, <del>where required,</del> and sequential approach <del>within the</del> <b>to specific</b> development site <b>proposals</b> directing the most vulnerable development to the areas at lowest risk <b>probability</b> of from flooding;</p> <p>b. Not result in an increased flood risk <del>elsewhere and, where possible, reduce</del> flood risk overall;</p> <p>c. Ensure development is safe from flooding for its lifetime including an assessment of climate change impacts;</p>	The wording of points a and b needed to be amended as they had been worded incorrectly (the latter needed to be aligned with the Planning Practice Guidance). This was raised by the EA in their Reg 19 response.



Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p>d. Incorporate flood protection, flood resilience and resistance measures where appropriate to the character and biodiversity of the area and the specific requirements of the site;</p> <p>e. <del>Include site drainage systems designed to take account of events which exceed the normal design standard;</del> <b><u>include site drainage systems designed to manage storm events up to and including the 1% Annual Exceedance Probability (1:100 year) storm with an appropriate allowance for climate change;</u></b></p> <p>f. Not increase net surface water run-off; and</p> <p>g. If appropriate, incorporate Sustainable Drainage Systems to manage surface water drainage, with whole-life management and maintenance arrangements.</p>	
MM20	Policy DM10 / 5.98	48/49	<p>Mineral deposits have to be worked where they are found, and these are often located in flood risk areas. Sand and gravel extraction and processing can take place in flood risk areas, provided any potential impact on the site and surrounding area is adequately managed so that the risk of flooding does not increase either within the site or downstream <b><u>including during the restoration phases</u></b>. Applications for minerals and waste proposals within Source Protection Zones should be accompanied by a Hydrogeological Risk Assessment.</p>	<p>Additional wording to clarify that increased risk should not occur elsewhere during restoration phased of mineral quarrying as raised by the Environment Agency in their Reg 19 response.</p>
MM21	Policy DM10 / 5.100	49	<p>Existing waste developments have the potential to pollute water resources if they are at risk from flooding. <del>Landfill and hazardous waste facilities will not be</del></p>	<p>Additional wording to clarify the application</p>

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p>permitted in Flood Risk Zones 3a and 3b. <b><u>Landfill and hazardous waste facilities are classed as More Vulnerable and as such are not permitted in Flood Zone 3b with an exception test required if they are proposed in Flood Zone 3a. Proposals will only be permitted in line with the vulnerability categories and classification in the National Planning Policy framework and Practice Guidance.</u></b> Historic landfills in areas of flood risk may need to be protected by flood defences.</p>	<p>of Policy DM10 in relation to proposals in Flood Zone 3a or 3b as raised by the Environment Agency in their Reg 19 response.</p>
MM22	DM11	50	<p>1. Planning permission will be granted for minerals and waste development where proposals do not:</p> <p>a. Result in the deterioration of the physical state, water quality or ecological status of any water resource and waterbody including river, streams, lakes, ponds, groundwater source protection zones and groundwater aquifers; and</p> <p>b. cause unacceptable risk to the quantity of water resources; and</p> <p>c. cause changes to groundwater and surface water levels which would result in unacceptable impacts on:</p> <p>i. adjoining land;</p> <p><b><u>ii. nearby private and licensed abstractions;</u></b></p> <p>iii. potential groundwater resources; and</p> <p>iiiv. the potential yield of groundwater resources, river flows or natural habitats.</p> <p>2. Where proposals are in a groundwater source protection zone <b><u>or present a hazard to water resources, quality and abstractors,</u></b> a</p>	<p>Additional wording to point 1c to clarify the need for a protection of nearby abstractions and point 2 to align with the Environment Agency's approach to protection of groundwater as raised by the Environment Agency in their Reg 19 response.</p>

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<b>Hydrogeological</b> /Hydrological Risk Assessment must be provided. If the <b>Hydrogeological</b> /Hydrological Risk Assessment identifies unacceptable risk, the developer must provide appropriate mitigation.	
MM23	Policy DM12 / 5.117	53	National planning policy supports developments where sustainable transport opportunities have been utilised, safe and suitable access can be achieved, and any significant impacts from the development on the transport network in terms of capacity, congestion and highway safety can be mitigated in an acceptable, and cost effective way <sup>57</sup> .  <sup>57</sup> National Planning Policy Framework (Para. <b>110</b> 408) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a> <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF July 2021.pdf</a>	NPPF 2021 Update
MM24	Policy DM13 / 5.127	57	National planning policy <sup>58</sup> attaches great importance to the design of the built environment and is a key aspect of sustainable development.  <sup>58</sup> National Planning Policy Framework (Para. <b>126</b> 424) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a> <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF July 2021.pdf</a>	NPPF 2021 Update
MM25	Policy DM15 / Heading	61	<del>Operator past performance</del> <b>Site History</b>	Focus on land-use in line with planning principles.

Ref.	Policy / Para.	Page	Proposed modification	Justification
MM26	Policy DM15 / 5.142	61	<del>An operator's record of running established minerals or waste sites within their control can provide information on how appropriately the impacts of development have been managed by that operator.</del> <b><u>The history of an established minerals or waste site can provide information on how appropriately the impacts of development can be managed at that site.</u></b> In some circumstances, where there is sufficient evidence, this information can be a useful indicator of how proposed future minerals or waste uses might need to be managed <del>by that operator.</del>	Focus on land-use in line with planning principles.
MM27	Policy DM15	61	<b>Policy DM15</b> <b><u>Past operator performance Site History</u></b>  1. Where an applicant or operator has been responsible for an existing or previous minerals or waste development site <b><u>there is a history of minerals or waste activities at a proposed site</u></b> , an assessment of <del>their</del> <b><u>the</u></b> operational performance at that existing or previous site will be made.  2. Where issues have been raised about the operation of an existing or previous development <b><u>a</u></b> site, how the operator or applicant has responded, particularly where there is evidence of any significant adverse effects, <b><u>these issues</u></b> will be taken into consideration in decision-making on minerals or waste applications submitted by the same applicant or operator <b><u>on that site</u></b> .	Focus on land-use in line with planning principles.
MM28	Policy DM15 / 5.147 (& New Para), 5.148, New Para., 5.149	62	The (re)occurrence of any significant adverse effects and how they have been addressed will be an indicator of whether <del>an operator or applicant can deliver future development effectively</del> <b><u>a particular land use can be made acceptable on a particular site</u></b> . <del>The applicant will need to provide information and relevant records on existing development site performance as</del>	

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p>part of the application, as well as submitting information on how any previous performance issues will be avoided and/or addressed in the future for the proposed development. <b><u>Particularly relevant will be those activities, impacts, potential impacts, or mitigation measures that are similar to the ones proposed.</u></b></p> <p>[Split 5.147]</p> <p><b><u>The applicant will need to provide information and relevant records on the existing site history as part of the planning application, as well as submitting information on how any previous performance issues will be avoided and/or addressed in the future for the proposed development.</u></b></p> <p>A Monitoring Assessment <b><u>information</u></b> will be required, to support the determination of a planning application, particularly where developments have a long or complex history of issues. Where there is no history of an operator within the Plan areas, it may be possible to obtain the relevant information through liaison with monitoring officers in locations where they have previously had active sites. It would be expected that the planning authority prepares the Monitoring Assessment <b><u>collates the monitoring information</u></b> with relevant input (e.g. monitoring officer, <b><u>site operator, Liaison Panel,</u></b> environmental health officer or Environment Agency). <b><u>The monitoring information will need to include how many and what types of issues have arisen, as well as whether and how they have been addressed.</u></b></p> <p><b><u>It is sometimes the case that new proposals amend the boundaries of an existing site, therefore a proposed site may overlap or adjoin an existing</u></b></p>	

Ref.	Policy / Para.	Page	Proposed modification			Justification
			<p><b><u>site. Monitoring information may still be required, if the operations at the existing site are considered to be relevant to the new proposals.</u></b></p> <p>The record of performance of an operator or applicant <b>site history</b>, as assessed, will form a material consideration in the decision-making process and may be used:</p> <ul style="list-style-type: none"> <li>As a basis to request additional information to support an application in relation to any issues raised through the Assessment and how these may be mitigated as part of the proposal;</li> <li>To apply an appropriate condition to a permission to address an issue which has been raised through the Assessment where this has not been rectified by the applicant to an acceptable level; or</li> </ul> <p>To tip the balance in determining an application where other matters are equal in relation to impacts.</p>			
MM29	Policy DM15 / 5.150	63	<b>Monitoring Issue</b>	<b>Monitoring Indicator</b>	<b>(Threshold) for Policy Review</b>	

Ref.	Policy / Para.	Page	Proposed modification			Justification
			Taking past performance <u>site history</u> into account	Permissions for proposals by existing operators accompanied by Monitoring Assessments  <u>Issues from monitoring information taken into account.</u>	Number of permissions where issues outlined in <u>from M monitoring Assessments information</u> are not addressed through additional information requests and/or conditions > 0	Focus on land-use in line with planning principles.
MM30	Policy M1	68	<p>The long term aims of the Plan are to provide and/or facilitate a steady and adequate supply of minerals to meet the needs of Central and Eastern Berkshire in accordance with all of the following principles:</p> <p>a) Work with relevant minerals planning authorities to maintain the supply of aggregate not available within Central and Eastern Berkshire;</p> <p>b) Deliver and/or facilitate the identified aggregate demand requirements (Policy M3);</p> <p>c) Facilitate the supply of other mineral to meet local demands (Policy M6);</p> <p>d) Be compliant with the spatial strategy for minerals development (Policy M4); <u>and</u></p> <p>e) Take account of wider Local Plans and development strategies for Central and Eastern Berkshire.</p>			Typo

Ref.	Policy / Para.	Page	Proposed modification	Justification
MM31	Policy M1 / 6.25	68	<p>The Central &amp; Eastern Berkshire Authorities will work jointly to maintain the supply of minerals that serve the wider Plan area. They will also work closely with relevant mineral planning authorities to plan for the provision of aggregates from outside of the Plan area that supply Central and Eastern Berkshire. This will be established through Statements of Common Ground.</p> <p><b><u>Aggregate that is not available to Central and Eastern Berkshire includes those not geologically present such as hard rock, those that cannot be sourced from within the Plan area due to constraints on supply. The constraints on supply will be explored within the Statements of Common Ground and monitored through the Local Aggregate Assessment (see Policy M3).</u></b></p>	Additional text to clarify what it meant by 'not available' to avoid ambiguity as raised by Oxfordshire County Council in their Reg 19 Response.
MM32	Policy M2 / 6.30	70	<p>Minerals are a valuable but finite resource that can only be won where they naturally occur. Safeguarding of viable or potentially viable mineral deposits from sterilisation by surface development is an important component of sustainable development. Safeguarding means taking a long-term view to ensure that sufficient resources will be available for future generations, and importantly, options remain open about where future mineral extraction might take place with the least environmental impact. National planning policy<sup>65</sup> is that planning authorities should safeguard mineral deposits that are of local or national importance against non-minerals development by defining Mineral Safeguarding Areas (MSAs) in their plans and not normally permit development in Mineral Safeguarding Areas if it constrains their potential future use<sup>66</sup>.</p> <p><sup>65</sup> National Planning Policy Framework (Para. <b>210</b>204 (c)) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/</a></p>	NPPF 2021 Update



Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p>NPPF_Feb_2019_web.pdf <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF July 2021.pdf</a></p> <p><sup>66</sup> National Planning Policy Framework (Para. <del>212</del>206)</p>	
MM33	Policy M2 / 6.31	70	Minerals of local and national importance will be safeguarded and defined by <del>the</del> Mineral and Waste Safeguarding Areas (MWSA). This safeguarding will be achieved by encouraging extraction of the underlying minerals prior to development proceeding, where practicable, if it is necessary for the development to take place within the MWSA.	Removal of 'Waste' from the Mineral Safeguarding Area to avoid confusion.
MM34	Policy M2 / 6.38	71	It is important to note that there is no automatic presumption that planning permission for the winning and working of sand and gravel will be granted in MWSAs.	Removal of 'Waste' from the Mineral Safeguarding Area to avoid confusion.
MM35	Policy M2	72	<p>Policy M2 Safeguarding sand and gravel resources</p> <ol style="list-style-type: none"> <li>1. Sharp sand and gravel and soft sand resources of economic importance, and around active mineral workings, are safeguarded against unnecessary sterilisation by non-minerals development.</li> <li>2. Safeguarded mineral resources are defined by the Minerals and <del>Waste</del> Safeguarding Area illustrated on the Policies Map.</li> <li>3. Non-minerals development in the Minerals and <del>Waste</del> Safeguarding Area may be permitted if it can be demonstrated <b><u>through the preparation of a Mineral Resources Assessment</u></b>, that the option of prior extraction has been fully considered as part of an application, and:</li> </ol>	<p>Removal of 'Waste' from the Mineral Safeguarding Area to avoid confusion.</p> <p>To provide clarity on how policy M2 makes provision for temporary development and that prior extraction can only take place where it is practical and feasible.</p>

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p>a. Prior extraction, <b>where practical and environmentally feasible</b>, is maximised, taking into account site constraints and phasing of development; or</p> <p>b. It can be demonstrated that the mineral resources will not be <b>permanently</b> sterilised; or</p> <p>c. It would be inappropriate to extract mineral resources in that location, with regard to other policies in the wider Local Plans.</p>	<p>Inclusion of requirement for a Mineral Resource Assessment included for clarification purposes.</p>
MM36	Policy M2 / 6.39 & 6.40	72	<p>The extent of MWSA will be based on information about aggregate sand and gravel resources from the British Geological Survey and other sources of geological information, plus existing mineral working permissions and the nature and duration of any such operations. In some instances, the MWSAs will apply to sand and gravel deposits beneath existing built up urban areas. This ensures sand and gravel deposits and the possibility for prior extraction is taken into account when proposals for large scale redevelopment are considered. The broad extent of sand and gravel resources to which the MWSA will apply are shown on the Key Diagram and Policies Map.</p> <p>In assessing development proposals within the MWSA, the Central &amp; Eastern Berkshire Authorities will have regard, amongst other things, to the size and nature of the proposed development, the availability of alternative locations and the need for phasing of the proposed development. Account will also be taken of the quantity and quality of the sand and gravel that could be recovered by prior extraction and the practicality and environmental impacts of doing so. A minimum plot size of 3 hectares<sup>67</sup> will apply in the safeguarding process to avoid repeated consideration of prior extraction where this can be assumed to be uneconomic, due to the small size of the parcels of land involved. However, applications will be monitored to ensure a piecemeal</p>	<p>Removal of 'Waste' from the Mineral Safeguarding Area to avoid confusion.</p>

Ref.	Policy / Para.	Page	Proposed modification		Justification
			approach is not taken which could accumulate to have an impact on resources.		
MM37	Policy M2 / 6.46	74	<p><b><u>The Central &amp; Eastern Berkshire Authorities have produced a Minerals Consultation Area in line with</u></b> National Planning Guidance<sup>68</sup> states that a Minerals Consultation Area (MCA) should be produced based on the MSA. <del>The Central and Eastern Berkshire Authorities' Mineral and Waste Consultation Area (MWCA) includes a buffer of 250 metres around quarries and 50 metres around other mineral operations. The MWCA will be applied by the Central &amp; Eastern Berkshire Authorities</del> <b><u>which will be used</u></b> to determine whether they need to consult a neighbouring Mineral Planning Authority or each other on an application <b><u>which could impact mineral resources or supply.</u></b> <del>and to ensure that minerals and waste issues are taken into consideration when determining non-minerals or waste applications.</del></p>		Revision to clarify that the MCA is an internal tool.
MM38	Policy M2 / 6.48	74	<b>Monitoring Indicator (Threshold) for Policy Review</b>		Clarification of the Monitoring of Policy M2.
			<del>Area (Hectares) of MWSA on completed sites above 3 ha in size,</del> <b><u>safeguarded resource</u></b> sterilised by non-minerals development <b><u>not subject to prior extraction</u></b>	Year on year increase over 5 years.	
			<b><u>Amount of sand and gravel (including soft sand) extracted through prior extraction in tonnes per annum.</u></b>	<b><u>No increase over 5 years.</u></b>	

Ref.	Policy / Para.	Page	Proposed modification	Justification
MM39	Policy M3 / 6.49	75	<p>The requirement under national planning policy<sup>69</sup> is that minerals policies should make provision for ensuring a steady and adequate supply of aggregates for the construction industry and wider economy by means of maintaining a 'landbank'.</p> <p><sup>69</sup> National Planning Policy Framework (Para. <del>213</del>207) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a> <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF July 2021.pdf</a></p>	NPPF 2021 Update
MM40	Policy M3 / 6.53	75	<p>National planning policy<sup>70</sup> also requires mineral planning authorities to make provision for the maintenance of a landbank of at least seven years for sand and gravel.</p> <p><sup>70</sup> National Planning Policy Framework (Para. <del>213</del>207 (f))</p>	NPPF 2021 Update
MM41	Policy M3 / 6.57 (New Para. 6.58)	76	<p>A change in local circumstances will have an impact on demand and therefore, the landbank. The proposed Heathrow airport expansion, subject to ongoing legal challenges and consultations, is such an example which would create a local increase in demand for aggregate. However, there is currently a significant level of uncertainty over the proposals for the Heathrow airport expansion with regard to timings and construction methods which would influence demand.</p> <p>[split of para. 6.57]</p> <p>It is <del>therefore</del>, accepted that the provision rate may change over the Plan period in order to maintain the landbank and a steady and adequate supply of aggregate. This will be monitored through the Local Aggregate Assessment and reviewed within three years, where necessary. <b><u>If sufficient sand and</u></b></p>	Clarification on reliance on imports during the Plan period based on allocations.

Ref.	Policy / Para.	Page	Proposed modification	Justification				
			<p><u>gravel is not provided within the Plan area, there will be a reliance on imports from other Mineral Planning Authority areas until such time development is delivered within Central and Eastern Berkshire. Imports will be regularly monitored but it is anticipated, based on the allocations in the Plan, that sand and gravel will be delivered from outside of the Plan area throughout the Plan period at the following rates:</u></p> <ul style="list-style-type: none"> <li>• <u>228,000 tonnes at 2026;</u></li> <li>• <u>378,000 tonnes at 2031; and</u></li> <li>• <u>628,000 tonnes at 2036.</u></li> </ul>					
MM42	Policy M3 / 6.65	77	<p>The effectiveness of the policy will need to be carefully monitored through the Local Aggregate Assessment <u>including import levels</u> to ensure that changes in local circumstances are reflected in any future provision rate. <u>Local circumstances include issues specific to the Plan area which may impact either demand or supply such as a major infrastructure project or delivery constraints associated with quarries or minerals infrastructure supplying Central and Eastern Berkshire.</u> However, it should also be recognised that these changes maybe time-limited due to their association with specific large-scale infrastructure projects such as <u>the</u> proposed Heathrow airport expansion, rather than a long-term trend.</p>	<p>Additional text to clarify what it meant by 'local circumstance' to avoid ambiguity as raised by Oxfordshire County Council in their Reg 19 Response and correction of typo.</p>				
MM43	Policy M3 / 6.66	78	<table border="1"> <tr> <td><b>Monitoring Indicator</b></td> <td><b>(Threshold) for Policy Review</b></td> </tr> <tr> <td>Sand and gravel sales fail to achieve provision rate.</td> <td>Breach over 3 consecutive years.</td> </tr> </table>	<b>Monitoring Indicator</b>	<b>(Threshold) for Policy Review</b>	Sand and gravel sales fail to achieve provision rate.	Breach over 3 consecutive years.	<p>The Threshold for Policy Review has been amended to align with Policy M3 and Para. 6.57 which</p>
<b>Monitoring Indicator</b>	<b>(Threshold) for Policy Review</b>							
Sand and gravel sales fail to achieve provision rate.	Breach over 3 consecutive years.							

Ref.	Policy / Para.	Page	Proposed modification		Justification
			Sand and gravel sales exceed provision rate.	Increasing trend in sales (above provision rate) over <u>5</u> <u>3</u> consecutive years.	states that the provision rate will be reviewed every three years.
			<b><u>Imports of sand and gravel increase.</u></b>	<b><u>Increasing trend over Plan period.</u></b>	New indicator to monitoring import levels to ensure land-won demand not impacted as raised by Oxfordshire County Council in their Reg 19 Response.
MM44	Policy M4 / 6.69, 6.70, 6.71 & 6.72 (& New Para.	79	<p>There is a requirement to provide an additional 5.447 Mt of sharp sand and gravel (0.628 Mt per annum) during the Plan period. As such, there is a need to identify sites for local land-won aggregate <b><u>to meet the 2.5 Mt shortfall. However, addressing the shortfall will be dependent not only on the yield of the sites but when they are likely to come forward and their annual throughput.</u></b></p> <p>The new sites identified in Policy M4 have been nominated by industry and have been assessed to be appropriate for development subject to the relevant development considerations outlined in Appendix A. <b><u>The allocations in seek to provide 0.4 Mt in terms of contribution to supply.</u></b></p> <p>The exact timings of sites coming forward will depend on the market conditions, extraction rates at existing sites and planning permission being granted. <b><u>However, it is anticipated that the allocations are likely to be</u></b></p>		<p>Additional text to clarify the extent of the shortfall but also the contribution that is being made by the allocations in terms of supply.</p> <p>Additional text to confirm when the allocations are intended to be delivered in the Plan period.</p>

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p><b><u>delivered at the following points within the Plan period, subject to planning permission being granted:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Horton Brook &amp; Poyle Quarry Extension, Horton (MA1) – from 2024+;</u></b></li> <li>• <b><u>Poyle Quarry Extensions, Horton (MA2) – from 2024+.</u></b></li> </ul> <p>Despite new site allocations, there is still likely to be a shortfall in supply during the Plan period<sup>74</sup>. The aggregate industry has not identified sufficient sites to plug this gap at present. The minerals industry is market-led, and it <b>is</b> recognised that there is likely to be a need for future requirements, particularly considering major infrastructure projects in the area such as the proposed Heathrow airport expansion.</p> <p>[split of Para. 6.72]</p> <p>In order to provide flexibility in supply and to allow industry to bring forward appropriate sites, Policy M4 (3) outlines a contingency <b><u>criteria-based</u></b> approach to ensure that the landbank is maintained and therefore a steady and adequate supply. <b><u>Sites will be expected to come forward within the Area of Search for sand and gravel which demonstrates the potential resource in the Plan area. This approach is supported by a Statement of Common Ground with neighbouring mineral planning authorities as outlined in Policy M1. Preferred Areas cannot be provided due to the lack of evidence, and it is considered that this may limit the potential for proposals to come forward across the Plan area.</u></b></p>	<p>Addition text to correct typos and provide clarification on the approach taken to allowing additional new proposals to come forward.</p>
MM45	Policy M4	80	Policy M4 Locations for sand and gravel extraction	Additional text to clarify the quantum expected to be

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p>A steady and adequate supply of locally extracted sand and gravel will be provided by:</p> <ol style="list-style-type: none"> <li>1. The extraction of remaining reserves at the following permitted sites: <ol style="list-style-type: none"> <li>a. Horton Brook Quarry, Horton</li> <li>b. Riding Court Farm, Datchet</li> <li>c. Sheephouse Farm, Maidenhead</li> <li>d. Poyle Quarry, Horton</li> <li>e. Water Oakley, Holyport</li> </ol> </li> <li>2. Extensions to the following existing sites, <b><u>provided the proposals address the relevant development considerations outlined in Appendix A:</u></b> <ol style="list-style-type: none"> <li>a. Horton Brook &amp; Poyle Quarry, Horton (MA1) <b><u>- 0.15 Mt</u></b></li> <li>b. Poyle Quarry, Horton (MA 2) <b><u>- 0.25 Mt</u></b></li> </ol> </li> <li>3. Proposals for new sites not outlined in Policy M4 (1 and 2) will be supported, in appropriate locations <b><u>which comply with all relevant policies in the Plan</u></b>, where: <ol style="list-style-type: none"> <li>a. They are situated within the Area of Search (as shown on the Policies Map); and</li> <li>b. They are needed to maintain the landbank; and/or</li> <li>c. Maximise opportunities of existing infrastructure and available resources; or</li> <li>d. At least one of the following applies: <ol style="list-style-type: none"> <li>i. The site contains soft sand;</li> </ol> </li> </ol> </li> </ol>	<p>delivered by each allocation in Policy M4 and to give the development considerations greater weight.</p> <p>Clarification of term 'appropriate locations'</p>



Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p>ii. The resources would otherwise be sterilised; or</p> <p>iii. The proposal is for a specific local requirement.</p>	
MM46	Policy M4 / 6.74 (New Para. 6.75)	80	<p>The Area of Search is shown on the Policies Map. <b><u>The Area of Search is based on the presence of soft sand, sharp sand and gravel resources but excludes designated areas which are identified in the NPPF as areas that should be avoided for development to be sustainable. The settings of designations could not be excluded as these are not clearly defined. However, built up areas and those areas of remaining resource of less than 3 hectares was excluded as being unlikely to be viable.</u></b></p> <p>[split Para. 6.74]</p> <p>It is recognised that the Area of Search <del>However, the criteria defining the Area and therefore, the extent</del> will change as land uses change and new designations are made or amended. <b><u>However, the application of the criteria will remain constant and will determine the extent of the Area of Search.</u></b> Sites identified within the Area of Search will still be subject to planning permission.</p>	To clarify how the Area of Search will be applied over the Plan period.
MM47	Policy M4 / 6.77	81	<p>National planning policy<sup>75</sup> states that provision should be made to maintain the landbank at 'at least' 7 years for sand and gravel.</p> <p><sup>75</sup> National Planning Policy Framework (para. <del>213</del>207(f)) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a> <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF July 2021.pdf</a></p>	NPPF 2021 Update
MM48	6.91	83	National policy requires the 'contribution that substitute or secondary and recycled materials <b><u>and minerals waste would</u></b> make to the supply of	NPPF 2021 Update

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p>materials <del>to be taken into account</del>, before considering extraction of primary materials, <b><u>whilst aiming to source minerals supplies indigenously</u></b>;<sup>76</sup>.</p> <p><sup>76</sup> National Planning Policy Framework (Para. <b>210204</b>-(b)) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF July 2021.pdf</a></p>	
MM49	Policy M5	84	<p>Policy M5 Supply of recycled and secondary aggregates</p> <p>1. Recycled and secondary aggregate production will be supported, in appropriate locations <b><u>which comply with all relevant policies in the Plan</u></b>, to encourage investment in new and existing infrastructure to maximise the availability of alternatives to local land-won sand and gravel.</p> <p>2. The supply of recycled aggregate will be provided by maintaining a minimum of 0.05 million tonnes per annum.</p>	Clarification of term 'appropriate locations'
MM50	6.106	86	<p>It is considered that should technology advances and more information on geological conditions become available, and the situation changes; there are sufficient policies within national planning policy<sup>78</sup> to determine any application for oil and gas.</p> <p><sup>78</sup> National Planning Policy Framework (most notably Para. <b>211205</b>) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF July 2021.pdf</a></p>	NPPF 2021 Update

Ref.	Policy / Para.	Page	Proposed modification	Justification
MM51	6.108	86	<p>Whilst it is considered unlikely that an application will come forward for coal extraction, in such event, national planning policy<sup>79</sup> would provide sufficient guidance in determining any such application.</p> <p><sup>79</sup> National Planning Policy Framework (most notably Para. <b>217</b>244) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a> <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF July 2021.pdf</a></p>	NPPF 2021 Update
MM52	Policy M6 / 6.112	87	<p>Due to lack of demand for chalk for industrial processes there is no requirement to make 15 years provision of chalk (as cement primary) as outlined in national planning policy<sup>80</sup>.</p> <p><sup>80</sup> National Planning Policy Framework (Para. <b>214</b>208 (c)) – <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a> <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF July 2021.pdf</a></p>	NPPF 2021 Update
MM53	Policy M6 / 6.118	88	<p>Due to the lack of current brick and tileworks within Central and Eastern Berkshire, there is no requirement to make 25 years provision of brick-making clay as outlined in national planning policy<sup>81</sup>.</p> <p><sup>81</sup> National Planning Policy Framework (Para. <b>214</b>208 (c)) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a> <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF July 2021.pdf</a></p>	NPPF 2021 Update

Ref.	Policy / Para.	Page	Proposed modification	Justification
MM54	Policy M6	88	<p>Policy M6 Chalk and clay</p> <p>1. Proposals for the extraction of chalk and clay to meet a local requirement will be supported, in appropriate locations <b><u>which comply with all relevant policies in the Plan,</u></b> subject to there being no other suitable, sustainable alternative source of mineral <b><u>including substitute or recycled secondary material is</u></b> available.</p>	Clarification of term 'appropriate locations'
MM55	Policy M6 / 6.119	88	<p>Proposals for the extraction of non-aggregate minerals will be supported where they are in 'appropriate locations' and therefore, comply with all relevant policies within this Plan. <b><u>Sustainable alternative sources should include substitute or recycled and secondary materials, where suitable<sup>xx</sup></u></b>. Chalk and clay in particular will be assessed to consider whether the material concerned is needed to meet a specific local requirement which would supply Central and Eastern Berkshire or the immediate surrounding planning authority areas.</p> <p><b><u><sup>xx</sup>National Planning Policy Framework (Para. 210 (b))</u></b></p>	Additional text to clarify that sustainable alternative sources could also include substitutes or recycled and secondary materials.
MM56	Policy M7 / 6.124	90	<p>National policy encourages the use of sustainable transport<sup>82</sup></p> <p><sup>82</sup>National Planning Policy Framework (Para. <b>104</b>102) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF July 2021.pdf</a></p>	NPPF 2021 Update
MM57	Policy M7	91	<p>Policy M7 Aggregate wharves and rail depots</p> <p>1. Proposals for aggregate wharves or rail depots will be supported:</p>	Additional text to give the development

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p>a. At Monkey Island Wharf, Bray (TA 1) <b><u>provided the proposal addresses the relevant development considerations outlined in Appendix A</u></b>; and</p> <p>b. In appropriate locations <b><u>which comply with all relevant policies in the Plan</u></b>, with good connectivity to:</p> <ul style="list-style-type: none"> <li>i. The Strategic Road Network; and/or</li> <li>ii. The rail network; and/or</li> <li>iii. Minerals infrastructure.</li> </ul>	<p>considerations greater weight.</p> <p>Clarification of term 'appropriate locations'</p>
MM58	Policy M8 / 6.132	92	<p>Safeguarding minerals infrastructure is a requirement of national planning policy<sup>85</sup> which states that Mineral Planning Authorities should safeguard: "existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary <b><u>aggregate</u></b> material".</p> <p><sup>85</sup>National Planning Policy Framework (Para. <del>210</del>204 (e)) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf</a></p>	NPPF 2021 Update
MM59	Policy M8 / 6.136	93	<p>Any existing or planned mineral operation including rail depot or wharf will be automatically safeguarded and a list of safeguarded sites will be maintained by the Central &amp; Eastern Berkshire Authorities. <del>Safeguarded minerals sites will be shown on the Minerals and Waste Safeguarding Area and associated Consultation Area.</del></p>	Removal of 'Waste' from the Mineral Safeguarding Area to avoid confusion.

Ref.	Policy / Para.	Page	Proposed modification	Justification
MM60	Policy M8 / 6.138	93	<p>In line with the “agent of change” principle in national planning policy<sup>86</sup>, potentially encroaching development will need to provide adequate mitigation measures to avoid prejudicing or jeopardising the safeguarded site or provide evidence that the safeguarded site will be unaffected.</p> <p><sup>86</sup>National Planning Policy Framework (Para. <b>187</b>182) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF July 2021.pdf</a></p>	NPPF 2021 Update
MM61	Policy W1	98	<p>Policy W1 Sustainable waste development strategy</p> <p>1. The long term aims of the Plan are to provide and/or facilitate sustainable management of waste for Central and Eastern Berkshire in accordance with all of the following principles:</p> <p>a. <del>Encourage</del> <b>Demonstrate how</b> waste <del>to</del><b>will</b> be managed at the highest achievable level within the waste hierarchy;</p> <p>b. Locate near to the sources of waste, or markets for its use;</p> <p>c. Maximise opportunities to share infrastructure at appropriate existing mineral or waste sites;</p> <p>d. Deliver and/or facilitate the identified waste management capacity requirements (Policy W3);</p> <p>e. Be compliant with the spatial strategy for waste development (Policy W4).</p> <p>f. Where W1 (e) cannot be achieved, work with other waste planning authorities to provide the most sustainable option for waste management.</p>	Clarify that following the waste hierarchy is a requirement.

Ref.	Policy / Para.	Page	Proposed modification	Justification
MM62	Policy W2	100	<p>Policy W2 Safeguarding of waste management facilities</p> <p>1. All <b>lawful or permitted</b> existing, planned and allocated waste management facilities shall be safeguarded against development that would prejudice or jeopardise their operation by creating incompatible land uses.</p> <p>2. New waste management facilities will be automatically safeguarded <b>for the duration of the permission</b>.</p> <p>3. Non-waste development that might result in a loss of permanent waste management capacity may be considered in the following circumstances:</p> <p>a. The planning benefits of the non-waste development clearly outweigh the need for the waste management facility at the location taking into account wider Local Plans and development strategies; and</p> <p>b. An alternative site providing an equal or greater level of waste management capacity of the same type has been found within the Plan area, granted permission and shall be developed and operational prior to the loss of the existing site; or</p> <p>c. It can be demonstrated that the waste management facility is no longer required and will not be required within the Plan period</p>	To clarify the safeguarding criteria.
MM63	Policy W2 / 7.30	101	<p><del>Safeguarded waste sites will be shown on the Minerals and Waste Safeguarding Area and associated Consultation Area.</del> <b><u>A list of safeguarded sites (operational and planned) is outlined in Appendix E. It will be maintained by the Central &amp; Eastern Berkshire Authorities and reported in the Monitoring Report. This will be updated as permissions are granted, and sites are closed and no longer require safeguarding.</u></b></p>	Text to clarify where the update to Appendix E will be reported and consistency with Policy M2.

Ref.	Policy / Para.	Page	Proposed modification	Justification
MM64	Policy W2 / 7.36	102	<p>In line with the “agent of change” principle in national planning policy<sup>92</sup>, it will be expected that the potentially encroaching development will need to provide adequate mitigation measures to avoid prejudicing or jeopardising the safeguarded site or provide evidence that the safeguarded site will be unaffected.</p> <p><sup>92</sup>National Planning Policy Framework (Para. <del>187</del>182) - <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf</a><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf</a></p>	NPPF 2021 Update
MM65	Policy W3	109	<p>Policy W3 Waste capacity requirements</p> <p>1. Additional waste infrastructure capacity within the Plan area will be granted in appropriate locations, to provide a minimum of:</p> <ul style="list-style-type: none"> <li>• 300,000 tpa non-hazardous recycling capacity;</li> <li>• 245,000 tpa non-hazardous recovery capacity;</li> <li>• 575,000 tpa of inert recycling or recovery capacity.</li> </ul> <p>2. Hazardous waste management facilities, waste water or sewage treatment plants and non-hazardous waste landfill for residual waste will be supported, in appropriate locations <b><u>which comply with all relevant policies in the Plan,</u></b> where there is a clear and demonstrable need.</p>	Clarification of term ‘appropriate locations
MM66	Policy W4 / 7.93	112	<p>Sites suitable for general industrial uses are those identified as suitable for B2 (including mixed B2/B8), or some uses within the B8 use class<sup>101</sup> (namely open-air storage). Waste management uses would not normally be suitable on land identified only for B4 <b><u>E(g)(iii)</u></b> (light industrial <b><u>processes</u></b>uses), although a limited number of low impact waste management uses (e.g. the dis-assembly of electrical equipment) may be suitable on these sites. Some industrial</p>	Update of Use Class Orders (to comply with change from 1st September 2020)



Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p>estates will not be considered suitable for certain waste management facilities because for instance the units are small, the estate is akin to a business park, or it is located close to residential properties.</p> <p><sup>101</sup> The Town and Country Planning (Use Classes) Order 1987 - <a href="http://www.legislation.gov.uk/ukssi/1987/764/schedule/made">http://www.legislation.gov.uk/ukssi/1987/764/schedule/made</a> - as amended by The Town and Country Planning (Use Classes) (Amendment) (England) Order 2010 - <a href="http://www.legislation.gov.uk/ukssi/2010/653/article/2/made">http://www.legislation.gov.uk/ukssi/2010/653/article/2/made</a></p>	
MM67	Policy W4	115	<p>Policy W4 Locations and sites for waste management</p> <p>1. The delivery of waste management infrastructure will be supported within:</p> <p>a. Preferred Waste Areas listed in Appendix C; or</p> <p><del>2. Where waste management infrastructure cannot be accommodated within the Preferred Waste Areas:</del></p> <p><b><u>ab. Allocated sites, provided the proposals address the relevant development considerations outlined in Appendix A:</u></b></p> <p>i. Berkyn Manor Farm, Horton (WA 1);</p> <p>ii. Horton Brook Quarry, Horton (WA 2);</p> <p>iii. The Compound, Stubbings, Maidenhead (WA 3); <b><u>or</u></b></p> <p><b><u>bc. Where waste management infrastructure cannot be accommodated within the Preferred Waste Areas, appropriate locations which comply with all relevant policies in the Plan</u></b>, where the site has good connectivity to the strategic road network; and</p> <p>i. Areas of major new development; or</p>	<p>Additional text to give the development considerations greater weight.</p> <p>Review Priority</p> <p>Clarification of term 'appropriate locations</p>

Ref.	Policy / Para.	Page	Proposed modification	Justification
			ii. Sources of waste; or iii. Markets for the types of waste to be managed; and iv. One or more of the following features: <ul style="list-style-type: none"> <li>- Is existing or planned industrial or employment land; or</li> <li>- Is a suitable reuse of previously developed land; or</li> <li>- Is within redundant farm or forestry buildings and their curtilages or hard standings; or</li> <li>- Is part of an active quarry or active landfill operation; or</li> <li>- Is within or adjoins sewage treatment works and the development enables the co-treatment of sewage sludge with other wastes; or</li> <li>- There is a clear proven and overriding need for the proposed facility to be sited in the proposed location.</li> </ul>	
MM68	Policy W4 / 7.106, 7.107 & 7.108	116	<p>The sites outlined in Policy W4 (2/a) are entirely located within the Green Belt which has special protection in respect to development. However, these sites are allocated for waste management purposes for the following reasons, in accordance with National Policy<sup>103</sup>.</p> <p>a) Consideration <del>is</del><b>has been</b> given first to locating waste management facilities within Preferred Waste Areas, which are not located within the Green Belt.</p> <p>b) Where there is no capacity within the Preferred Waste Areas or the locational needs of the waste management facility prevents it being accommodated within the Preferred Waste Areas, the lack of available sites outside of the Green Belt will need to be taken into consideration as part of the exceptional circumstances.</p> <p>The Preferred Waste Areas identified in Appendix C have been assessed on their suitability for waste management <b><u>and are therefore prioritised over</u></b></p>	<p>To clarify that the sites were allocated due to the inability of the Preferred Waste Areas to accommodate those waste uses.</p> <p>Text to clarify the priority order in Policy W4.</p>

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p><b>other locations.</b> However, planning permission will not be automatically granted, and the proposals will need to comply with all relevant policies within this plan as well as consider the wider Local Plans and development strategies for Central and Eastern Berkshire.</p> <p><b><u>Where proposals cannot be accommodated in the Preferred Waste Areas, they will need to demonstrate this, in which case they</u></b> Proposals for further waste management development will be supported where they are in 'appropriate locations' and therefore, comply with all relevant policies within this Plan. Evidence of the requirement for a particular location will need to be provided in addition to compliance with the other relevant policies in the Plan.</p>	
MM69	Policy W5	119	<p>Policy W5 Reworking landfills</p> <p>1. Proposals for the re-working of landfill sites will only be permitted in appropriate locations <b><u>which comply with all relevant policies in the Plan,</u></b> where the proposals would result in beneficial use of the land and of the material being extracted; and, where appropriate, the landfill by-products.</p>	Clarification of term 'appropriate locations'
MM70	Appendix A (Berkyn Manor, Horton (WA1))	124	<ul style="list-style-type: none"> <li>• Impacts to Wraysbury reservoir Site of Special Scientific Interest (SSSI), Staines Moor SSSI, Wraysbury No.1 Gravel Pit SSSI, Wraysbury and Hythe End Gravel Pit SSSI.</li> <li>• Impacts to Queen Mother Reservoir Local Wildlife Site (LWS), Arthur Jacob Nature Reserve LWS, Colne Brook LWS Horton and Kingsmead Lakes LWS.</li> <li>• Consideration of hydrological impacts.</li> <li>• Retention and buffering of hedgerows within site.</li> <li>• Consideration of the Colne Valley Gravel Pits and Reservoirs Biodiversity Opportunity Area in restoration or operational landscaping.</li> </ul>	<p>Development consideration to ensure the proposal can be justified in the Green Belt.</p> <p>The Joint Connectivity Statement is no longer relevant.</p>

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<ul style="list-style-type: none"> <li>• <del>The restoration of the site must consider</del> consideration to the Colne and Crane Valleys Green Infrastructure Strategy (2019) and to the Joint Connectivity Statement<sup>106</sup>.</li> </ul> <p>Landscape &amp; Townscape</p> <ul style="list-style-type: none"> <li>• Existing vegetation should be conserved and protected, and additional buffer planting established to all boundaries.</li> <li>• Enhanced screening is required.</li> <li>• <b><u>Green Belt compensation due to development of the site must take into consideration the Colne and Crane Valleys Green Infrastructure Strategy (2019) and its key principles.</u></b></li> <li>• <b><u>Particular consideration should be given to whether the development is not inappropriate in the Green Belt, preserves its openness and does not conflict with the purposes of including land within it.</u></b></li> </ul> <p>Historic Environment:</p> <ul style="list-style-type: none"> <li>• A Heritage Impact Statement is required.</li> <li>• The setting of Grade II Listed Building to the south needs to be considered.</li> </ul> <p>Transport:</p> <ul style="list-style-type: none"> <li>• <del>A new access onto Poyle Road is required for mineral use and further</del> <b><u>Further</u></b> investigation is required for a suitable access onto Stanwell Road for waste uses.</li> <li>• A Transport Assessment or Statement is required.</li> <li>• A HGV Routeing Agreement will be required.</li> </ul>	Update as new access is now permitted.

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p>Flood Risk &amp; Water Resources</p> <ul style="list-style-type: none"> <li>• A Flood Risk Assessment and Hydrological/Hydrogeological Assessment will be required.</li> <li>• Proximity to major / minor aquifers, in addition to Source Protection Zones.</li> </ul> <p><sup>106</sup> Joint Connectivity Statement between the Colne Valley Regional Park, Slough Borough Council, RBWM and the Buckinghamshire authorities.</p>	
MM71	Appendix A – Horton Brook	125	<b>Area: 5.5 ha</b>	Correction
MM72	Appendix A (Horton Brook Quarry, Horton (WA2))	126	<p>Landscape &amp; Townscape:</p> <ul style="list-style-type: none"> <li>• Proposals should ensure adequate space is set aside for the establishment of a strong new landscape structure for this group of sites (Poyle Quarry and extensions, Berkyn Manor and Horton Brook) including large scale native species tree belts.</li> <li>• Integrate new structures with effective screen planting, including along boundaries.</li> <li>• Restoration proposals should have reference to the Colne Valley Gravel Pits and Reservoirs BOA.</li> <li>• <del>Restoration</del> <b>Green Belt compensation due to development</b> of the site must give <b>take into</b> consideration to the Colne and Crane Valleys Green Infrastructure Strategy (2019) <b>and its key principles</b> and to the Joint Connectivity Statement<sup>107</sup>.</li> <li>• <b><u>Particular consideration should be given to whether the development is not inappropriate in the Green Belt, preserves its openness and does not conflict with the purposes of including land within it.</u></b></li> </ul>	<p>Development consideration to ensure the proposal can be justified in the Green Belt.</p> <p>The Joint Connectivity Statement is no longer relevant.</p>

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<sup>107</sup> <del>Joint Connectivity Statement between the Colne Valley Regional Park, Slough Borough Council, RBWM and the Buckinghamshire authorities.</del>	
MM73	Appendix A (Horton Brook & Poyle Quarry Extension, Horton (MA1))	127	Proposal: Extension to Horton Brook and Poyle Quarry extracting <del>250,000</del> <b>150,000</b> tonnes of sand and gravel with no processing on site.	Correction of figure.
MM74	Appendix A (Horton Brook & Poyle Quarry Extension, Horton (MA1))	128	<p>Landscape &amp; Townscape</p> <ul style="list-style-type: none"> <li>The Colne Valley Way Trail will need to be temporarily diverted and <del>re-established</del> <b>re-established</b> as part of the restoration and applicants will need to work closely with the relevant authorities and the Colne Valley Regional Park.</li> <li>The bridleway route and restoration of the site must seek to improve connectivity and enhance the local public access network and give consideration to the Colne and Crane Valleys Green Infrastructure Strategy (2019) <del>and to the Joint Connectivity Statement<sup>108</sup>.</del></li> </ul> <p>Transport:</p> <ul style="list-style-type: none"> <li>A Transport Assessment or Statement is required.</li> <li>An HGV Routeing Agreement will also be required (or maintain existing).</li> </ul> <p>Historic Environment</p> <ul style="list-style-type: none"> <li>The archaeological potential is high and will need to be addressed during the determination of the planning application.</li> </ul> <p>Flood Risk &amp; Water Resources</p>	<p>The Joint Connectivity Statement is no longer relevant.</p> <p>Additional text to clarify water resources information relating to the site as raised by the Environment Agency in their Reg 19 response.</p>

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<ul style="list-style-type: none"> <li>• A Flood Risk Assessment and Hydrological/Hydrogeological Assessment is required.</li> <li>• <b><u>Consideration of near-by private and licenced abstractions.</u></b></li> <li>• <b><u>Site located within a principal aquifer.</u></b></li> </ul> <p><sup>108</sup> Joint Connectivity Statement between the Colne Valley Regional Park, Slough Borough Council, RBWM and the Buckinghamshire authorities.</p>	
MM75	Appendix A (Monkey Island Lane Wharf, Bray (TA 1))	129/130	<p>Ecology</p> <ul style="list-style-type: none"> <li>• Protection of Bray Pennyroyal field Site of Special Scientific Interest (SSSI) and Bray Meadows SSSI.</li> <li>• Impacts to Greenway corridor Local Wildlife Site (LWS) within site, ensuring functionality as wildlife corridor is not compromised, and losses compensated.</li> <li>• <b><u>An ecological assessment of the impact of making The Cut (Greenway Corridor LWS) navigable will be required.</u></b></li> <li>• Impacts to Bray Pit Reserve LWS.</li> <li>• <b><u>Consideration of the Biodiversity Opportunity Area including ecological improvements to the Cut in line with the LWS citation.</u></b></li> <li>• <b><u>A River restoration compensation scheme will be required and is subject to approval by the Environment Agency. This should consist of habitats restoration for the equivalent amount of the river that will be made navigable and should be located immediately upstream. River restoration should include bed raising by adding gravels and creating marginal shelves to restore the channel to more natural dimensions.</u></b></li> <li>• Retention of semi-natural habitats within site to accommodate protected species.</li> </ul>	<p>Additional development considerations to address concerns raised over impact on ecology and river morphology caused by proposed development through the Environment Agency's Reg 19 response.</p> <p>Additional Flood Risk considerations following revision of the Strategic Flood Risk Assessment (Ref HS69d).</p>

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<ul style="list-style-type: none"> <li>• Consideration of pollution impacts to riverine habitats <b><u>both from construction and the ongoing impacts of using the river for navigation purposes.</u></b></li> <li>• <b><u>A morphological assessment of the impact of making The Cut navigable will be required including related impacts on the River Thames and its river corridors.</u></b></li> <li>• <b><u>A Water Framework Directive Assessment is required.</u></b></li> </ul> <p>Landscape &amp; Townscape</p> <ul style="list-style-type: none"> <li>• Strengthen existing landscape structure with new tree and hedgerow planting to integrate new structures.</li> <li>• Maintain and enhance the setting of the public access route to Bray Lake Recreation Area.</li> </ul> <p>Historic Environment</p> <ul style="list-style-type: none"> <li>• Archaeological issues would remain a material consideration and will need to be addressed during the determination of the planning application.</li> </ul> <p>Transport:</p> <ul style="list-style-type: none"> <li>• A Transport Assessment or Statement is required.</li> <li>• An HGV and Barge Routeing Agreement will be required.</li> </ul> <p>Flood Risk &amp; Water Resources</p> <ul style="list-style-type: none"> <li>• Site largely within Flood Zone 2/3 and Groundwater Source Protection Zone (1) – a Flood Risk Assessment and <b><u>Hydrological/Hydrogeological Risk Assessment will be required. The FRA will need to ensure that the development will be safe, not increase off site flood risk and consider all sources of flooding. Fluvial modelling will need to be undertaken to provide a</u></b></li> </ul>	



Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p><b><u>detailed assessment of fluvial flood risk and to ensure floodplain compensation is provided where required. Modelling should include the 5%, 1% and 1%+ climate change AEP.</u></b></p> <ul style="list-style-type: none"> <li>• Proximity to major / minor aquifers, in addition to Source Protection Zones.</li> <li>• <b><u>A morphological assessment of the impact of making The Cut navigable will be required including related impacts on the River Thames and its river corridors.</u></b></li> <li>• <del>Site will be accessed via the River Thames and the Cut – A Section 60 Accommodations License (which applies to mooring piles, slipways, landing stages and other private structural encroachments in the public river) will need to be secured.</del></li> <li>• <b><u>An Environmental Permit is required for the use of the Main River The Cut. This is also known as a Flood Risk Activity Permit.</u></b></li> <li>• <del>Consideration of The Cut, the River Thames and its river corridors.</del></li> </ul> <p><b><u>Waterways</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Site will be accessed via the River Thames and the Cut – A Section 60 Accommodations License (which applies to mooring piles, slipways, landing stages and other private structural encroachments in the public river) will need to be secured.</u></b></li> <li>• <b><u>An assessment of the effects in regard to navigation on the River Thames will be required i.e. what increase in commercial traffic/barges might there be and would this traffic be using Environment Agency lock sites.</u></b></li> </ul>	
MM76	Appendix A (Poyle Quarry)	132	<p>Transport</p> <ul style="list-style-type: none"> <li>• <del>Provision of a new access will be required, most likely onto Poyle Road.</del></li> <li>• A Transport Assessment or Statement is required.</li> </ul>	Revision of the correct water body as raised by the

Ref.	Policy / Para.	Page	Proposed modification	Justification				
	(Extensions), Horton (MA2))		<ul style="list-style-type: none"> <li>An HGV Routing Agreement will be required.</li> </ul> <p>Flood Risk &amp; Water Resources</p> <ul style="list-style-type: none"> <li>Both sites partly within Flood Zones 2 and/or 3</li> <li>The site is not located within a Source Protection Zone (SPZ) but the closest SPZ is located to the west of the site approximately under 1km away.</li> <li>Proximity to major / minor aquifers, in addition to Source Protection Zones.</li> <li>A Flood Risk Assessment and Hydrological/Hydrogeological Assessment will be required. <b><u>The FRA will need to ensure that the development will be safe, not increase off-site flood risk and consider all sources of flooding. Fluvial modelling will need to be undertaken to provide a detailed assessment of fluvial flood risk and to ensure floodplain compensation is provided where required. Modelling should include the 5%, 1% and 1%+ climate change AEP.</u></b></li> <li>Consideration of the River Colne <b>Brook</b> and its river corridor.</li> </ul>	<p>Environment Agency in their Reg 19 response.</p> <p>Update as new access is now permitted.</p> <p>Additional Flood Risk considerations following revision of the Strategic Flood Risk Assessment (Ref HS69d).</p>				
MM77	Appendix A (Stubbings Compound, Pinkneys Green, Maidenhead (WA3))	134	<p>Landscape &amp; Townscape:</p> <ul style="list-style-type: none"> <li><b><u>Particular consideration should be given to whether the development is not inappropriate in the Green Belt, preserves its openness and does not conflict with the purposes of including land within it.</u></b></li> </ul>	<p>Development consideration to ensure the proposal can be justified in the Green Belt.</p>				
MM78	Appendix C	149	<table border="1"> <thead> <tr> <th>Preferred Waste Area</th> <th>Local Planning Authority</th> </tr> </thead> <tbody> <tr> <td>Newlands Farm, Crowthorne</td> <td>Wokingham</td> </tr> </tbody> </table>	Preferred Waste Area	Local Planning Authority	Newlands Farm, Crowthorne	Wokingham	<p>Removal of sites due to application of Climate Change Allowance and</p>
Preferred Waste Area	Local Planning Authority							
Newlands Farm, Crowthorne	Wokingham							

Ref.	Policy / Para.	Page	Proposed modification		Justification
			Brookside Business Park, Swallowfield	Wokingham	impact of flood risk (see Revised Strategic Flood Risk Assessment (Ref HS69d)).
MM79	Appendix C	161	<b>Site Name</b>	<b>Richfield Avenue / Tessa Road Area</b>	Additional text due to application of Climate Change Allowance and impact of flood risk (see Revised Strategic Flood Risk Assessment (Ref HS69d)).  Update to reflect change in Use Classes (01.09.2020)
			Location	Richfield Ave, City Centre, Reading RG1 8EQ	
			Current use (specify class classification)	B4 <u>E(g)(iii)</u> / B2 / & B8	
			<p>This industrial area is considered potentially suitable for the following waste categories:</p> <ul style="list-style-type: none"> <li>• Category 2: Activities requiring a mix of enclosed buildings / plant and open ancillary <del>open</del> <b>areas</b> (possibly involving biological treatment); and</li> <li>• Category 3: Activities requiring enclosed industrial premises (small scale)</li> </ul> <p><b><u>Flood risk assessment would be required as part of any planning application to demonstrate the proposal would be safe for the lifespan of the development.</u></b></p>		

Ref.	Policy / Para.	Page	Proposed modification		Justification
MM80	Appendix C	162	<b>Site Name</b>	<b>Paddock Road Industrial Estate</b>	Additional text due to application of Climate Change Allowance and impact of flood risk (see Revised Strategic Flood Risk Assessment (Ref HS69d)).  Update to reflect change in Use Classes (01.09.2020)
			Location	Paddock Road, Reading RG4 5BY	
			Current use (specify class classification)	B1-(G) <b>E(g)(iii)</b> & B2	
			<p>This industrial area is considered potentially suitable for the following waste categories:</p> <ul style="list-style-type: none"> <li>Category 3: Activities requiring enclosed industrial premises (small scale)</li> </ul> <p><b><u>Flood risk assessment would be required as part of any planning application to demonstrate the proposal would be safe for the lifespan of the development.</u></b></p>		
MM81	Appendix C	164	<b>Site Name</b>	<b>Wigmore Lane</b>	Additional text due to application of Climate Change Allowance and impact of flood risk (see Revised Strategic Flood Risk Assessment (Ref HS69d)).
			Current use (specify class classification)	B1-(G) <b>E(g)(iii)</b> / B2 / <b>&amp;</b> B8	
			<p>This industrial area is considered potentially suitable for the following waste categories:</p> <ul style="list-style-type: none"> <li>Category 2: Activities requiring a mix of enclosed buildings / plant and open ancillary <del>open</del> <b>areas</b> (possibly involving biological treatment); and</li> </ul>		

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<ul style="list-style-type: none"> <li>Category 3: Activities requiring enclosed industrial premises (small scale)</li> </ul> <p><b><u>Flood risk assessment would be required as part of any planning application to demonstrate the proposal would be safe for the lifespan of the development.</u></b></p>	Update to reflect change in Use Classes (01.09.2020)
MM82	Appendix C	168	[Removal of Newlands Farm as a Preferred Waste Area – Table and Map]	Removal of site due to application of Climate Change Allowance and impact of flood risk (see Revised Strategic Flood Risk Assessment (Ref HS69d)).
MM83	Appendix C	177	[Removal of Brookside Business Park as a Preferred Waste Area – Table and Map]	Removal of site due to application of Climate Change Allowance and impact of flood risk (see Revised Strategic Flood Risk Assessment (Ref HS69d)).
MM84	Appendix E	182	[Additional line to be added after listed Household Waste Recycling Centre (HWRCs)]	Clarification of site safeguarding as this

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p><b><u>Specialist Waste Sites</u></b></p> <p><b><u>Site Name: Star Works</u></b></p> <p><b><u>Location: Knowl Hill</u></b></p> <p><b><u>Primary Function/Use: Clinical Waste</u></b></p> <p><b><u>Planning Permission / End Date: [blank]</u></b></p> <p><b><u>Operator: Grundon Waste Management Limited</u></b></p>	<p>site was listed as safeguarding for minerals only but is also safeguarded for waste uses as a long-standing land-use for clinical waste management. This issue was raised by Grundon Waste Management Limited in their Reg 19 response.</p>
MM85	Glossary & Acronyms	195	<p>National Planning Policy Framework (NPPF): Published in March 2012 and subsequently updated in 2018, and 2019, <b>and 2021</b>, the NPPF sets out the Government's planning policies for England and how these are expected to be applied.</p>	<p>NPPF 2021 Update</p>

**Central and Eastern Berkshire**

**Joint Minerals & Waste Plan**

# **Schedule of Proposed Additional Modifications**

Examination Library Reference: MD04

1 December 2021



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## 1. Introduction

- 1.1 Bracknell Forest Council, Reading Borough Council, the Royal Borough of Windsor and Maidenhead, and Wokingham Borough Council (collectively referred to as the 'Central & Eastern Berkshire Authorities') are working in partnership to produce a Joint Minerals and Waste Plan (JMWP/ 'the Plan') which will guide minerals and waste decision-making in the Plan area.
- 1.2 This document sets out additional (minor) (AM) modifications to be applied to the Submission version of the Plan. Proposed modifications were discussed at the examination hearings 28-30 September 2021 and 12 October 2021.
- 1.3 Modifications are presented in the following ways;
  - deleted text is struck through i.e. ~~deleted~~; and
  - new text is shown as bold and underlined i.e. **new text**.
- 1.4 The proposed Additional Modifications are not subject to consultation and are for information only.
- 1.5 Where relevant, reference has been made to updated evidence base documents which are available on the Examination Library. However, this is for information purposes and the documents are not subject to consultation.

## 2. Schedule of proposed Additional Modifications

Text to be inserted is shown **underlined**.

Text to be deleted is shown ~~struck through~~.

Ref.	Policy / Para.	Page	Proposed modification	Justification
AM1	Policy DM1 / 5.4	20	<p>Monitor all minerals and waste development proportionate to its potential risk and take appropriate compliance measures, including enforcement action when unauthorised development takes place (<b><u>in line with local monitoring and enforcement policies<sup>xx</sup></u></b>); and,</p> <p><b><u><sup>xx</sup> Bracknell Forest Council Local Enforcement Plan - <a href="https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-enforcement-and-breaches">https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-enforcement-and-breaches</a></u></b></p> <p><b><u>Reading Borough Council Local Planning Enforcement Plan - <a href="https://www.reading.gov.uk/planning/planning-enforcement/">https://www.reading.gov.uk/planning/planning-enforcement/</a></u></b></p> <p><b><u>Royal Borough of Windsor and Maidenhead Planning Enforcement Policy - <a href="https://www.rbwm.gov.uk/home/planning/request-enforcement-investigation">https://www.rbwm.gov.uk/home/planning/request-enforcement-investigation</a></u></b></p> <p><b><u>Wokingham Borough Council Local Planning Enforcement Plan - <a href="https://www.wokingham.gov.uk/planning/planning-enforcement/">https://www.wokingham.gov.uk/planning/planning-enforcement/</a></u></b></p>	To clarify where policy on monitoring and enforcement can be found.
AM2	Policy DM2 / 5.10 & 5.11	22/23	[Repeat of numbering 5.10 / 5.11 on page 22 and 23.]	Typo
AM3	Policy DM3 / 5.18	25	The Central & Eastern Berkshire Authorities will provide net gain for biodiversity as a result of development and will give regard to the implications of climate change to ensure that habitats are sufficiently protected and	Update of biodiversity metric.

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Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p>enhanced to support resilience to such changes, such as the creation of coherent ecological networks. Net gain will be measured using appropriate metrics such as Defra <b>Natural England</b>'s proposed biodiversity metric<sup>33</sup>.</p> <p><sup>33</sup> Net Gain consultation proposals (Defra, December 2018) – <a href="https://consult.defra.gov.uk/land-use/netgain/supporting_documents/netgainconsultationdocument.pdf">https://consult.defra.gov.uk/land-use/netgain/supporting_documents/netgainconsultationdocument.pdf</a> <b>The Biodiversity Metric 3.0: <a href="http://nepubprod.appspot.com/publication/6049804846366720">http://nepubprod.appspot.com/publication/6049804846366720</a></b></p>	
AM4	Policy DM3 / 5.31	29	<p><del>As the proposed net gain biodiversity metric is developed, the</del><b>The</b> Central &amp; Eastern Berkshire Authorities will take a consistent approach to its <b>the</b> application <b>of the Biodiversity Metric</b> in ensuring biodiversity net gain through minerals and waste development and in monitoring the performance of this policy. <b><u>Relevant guidance should also be applied, where available.</u></b></p>	Update of biodiversity metric and recognition of future guidance on applying the Metric to minerals developments.
AM5	Policy DM4 / New Para.	32	<p>Insertion of new Para. 5.39</p> <p><b><u>Landscape Character Assessments (LCA) can be used to assess the impact of minerals and waste development both inside and outside of designated areas. Consideration should be given to the LCAs of the Central and Eastern Berkshire Authorities, adjoining AONBs and to relevant National Character Areas<sup>xx</sup>.</u></b></p> <p><sup>xx</sup><b>National Character Areas</b> - <a href="https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles">https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles</a></p>	Additional guidance on application of LCAs.
AM6	Policy DM6 / 5.53	35	<p>When considering any planning application, the planning authority will ensure that substantial weight is given to protection of the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by</p>	To clarify how DM6(2) relates to 'very special circumstances'.

Ref.	Policy / Para.	Page	Proposed modification	Justification
			other considerations. <b><u>DM6 (2) outlines the considerations which would need to be demonstrated in these circumstances.</u></b>	
AM7	Policy DM6 / 5.55	36	<p>National planning policy<sup>44</sup> states that minerals extraction, engineering operations and the re-use of buildings provided that the buildings are of permanent and substantial construction are not inappropriate development in the Green Belt provided that they preserve the openness of the Green Belt and proposals do not conflict with the purpose of including land in the Green Belt. <b><u>Other exceptions include the re-use of buildings which could be relevant to waste proposals in the Green Belt<sup>xx</sup>. Consideration will also be given to the proposed duration of the development and the vehicle movements likely to be generated<sup>xx</sup>.</u></b></p> <p><sup>xx</sup><b><u>National Planning Policy Framework (Para. 150).</u></b></p> <p><sup>xx</sup><b><u>Planning Practice Guidance (Paragraph: 001 Reference ID: 64-001-20190722) - <a href="https://www.gov.uk/guidance/green-belt">https://www.gov.uk/guidance/green-belt</a></u></b></p>	<p>The temporary nature of mineral extraction was raised by Claremont Planning Consultancy at the Reg 19.</p> <p>The additional text is to clarify that other exceptions could be relevant and the duration of the development and the likely activity on site would need to be taken into consideration, as per Planning Practice Guidance.</p>
AM8	Policy DM7 / 5.61	38	<p>Minerals and waste development can play a positive role in protecting heritage assets and their settings, but it is also recognised that many developments can have an adverse impact, whether damaging or in the case of extraction on archaeology, more fully destructive. Where the public benefits of development outweigh the significance of the heritage assets, <del>archaeological</del> recording can mitigate the effect by making the results of archaeological excavations <u>s</u> and</p>	<p>Additional text to clarify mitigation for wider heritage assets.</p>

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<b>heritage asset studies</b> study available, through the Historic Environmental Record and other public arenas, where appropriate, as a public good.	
AM9	Policy DM7 / 5.62	38	The historic environment covers all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged as well as <b>historic and designed</b> landscaped and planted or managed flora.	Additional wording to clarify consideration of historic landscape.
AM10	Policy DM7 / 5.67	40	Mitigation measures should include archaeological recording, <b>and recording of other heritage assets</b> , during and prior to development, and changes to the development to ensure the preservation, provision within post extraction restoration, screening, and protection of retained heritage assets.	Additional wording to clarify importance of other heritage assets.
AM11	Policy DM8 / 5.76	42	Consideration needs to be given to the following factors: <ul style="list-style-type: none"> <li>• Type, quality and value of the land prior to extraction (for example, agricultural land);</li> <li>• Presence of important habitats and species prior to development on site and in the local environment;</li> <li>• Local ecological networks including green/blue corridors;</li> <li>• Existing hydrological regime;</li> <li>• <b><u>Ensuring flood risk is not increased from the pre-development scenario and where possible provide betterment through appropriate land management and SuDS in accordance with Policy DM10</u></b></li> <li>• Underlying geology;</li> <li>• Local topography and landscape character/setting;</li> <li>• Presence of important archaeological features and historic context;</li> <li>• Proximity of urban areas and aerodromes;</li> <li>• Compatibility with surrounding land uses;</li> </ul>	Additional text to cross-reference DM10 (Flood Risk) in relation to restoration.

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<ul style="list-style-type: none"> <li>• Availability of fill material;</li> <li>• Planning policy framework and guidance;</li> <li>• Landowner / site operator aspirations;</li> <li>• Views of local community and other stakeholders;</li> <li>• Transport issues;</li> <li>• Public safety;</li> <li>• Long-term management considerations; and</li> <li>• Financial considerations</li> </ul>	
AM12	Policy DM8 / New Para	42	<p>New Para. 5.78:</p> <p><b><u>Restoration and aftercare schemes should provide comprehensive details of the following:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Order and timings of phasing of minerals and landfill workings;</u></b></li> <li>• <b><u>How the scheme contributes to the local environment (for example biodiversity, landscape and historic environment), as appropriate;</u></b></li> <li>• <b><u>Restoration plans including considerations of key issues such as aerodrome safeguarding, soil handling, biodiversity, landscape impact, extant archaeology, flood risk, hydrology, as appropriate;</u></b></li> <li>• <b><u>Details of the importation of other materials which may be required to facilitate restoration (e.g. inert wastes), as appropriate;</u></b></li> <li>• <b><u>Plans for the final after-uses of the site; and</u></b></li> <li>• <b><u>Plans for the long-term aftercare and maintenance of the site.</u></b></li> </ul>	To provide sufficient clarity in the policy supporting text on what restoration information is required.
AM13	Policy DM8 / 5.82	43	<p>Restoration and aftercare plans should take into consideration community needs and aspirations. <b><u>Neighbourhood Plans should be considered and fora, such as liaison panels, can help to facilitate discussions.</u></b> Local interest groups such as Catchment Partnerships and community representatives should be consulted, and their viewpoints incorporated into the proposals wherever possible and appropriate. Developers should work with the</p>	To provide additional clarity on mechanisms for taking account of community needs and aspirations.

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<p>Colne Valley Regional Park and relevant Local Authorities to secure an enhanced bridleway/footpath network <del>in line with the Joint Connectivity Statement<sup>47</sup></del>. Regard should also be given to the green infrastructure policies and strategies of relevant local planning authorities and the Colne Valley Regional Park<sup>48</sup>. Restoration and aftercare plans for mineral development need to be reviewed and updated periodically, in accordance with legislation.</p> <p><del><sup>47</sup>Joint Connectivity Statement between the Colne Valley Regional Park, Slough Borough Council, RBWM and the Buckinghamshire authorities.</del></p>	Removal of Joint Connectivity Statement as no longer relevant.
AM14	Policy DM8 / 5.83	44	A Restoration Study <sup>49</sup> , which accompanies this Plan, provides greater detail and guidance on after-use, aftercare and restoration <b><u>options, opportunities and requirements</u></b> . The study and any subsequent restoration strategies or guidance adopted by the authorities should be read in conjunction with this policy and referenced, where appropriate.	To further clarify the options or strategies to be considered by developers and operators.
AM15	Policy DM9 / 5.90	46	Minerals and waste development and associated traffic movements can give rise to air pollutants that adversely impact human health and sensitive environmental receptors. This can include sulphur oxides (SOx), nitrogen oxides (NOx) and carbon particulates (e.g. PM10). HGV traffic can extend these air quality impacts significantly beyond development sites and into adjacent local authority areas. Local authorities review and assess air quality on a regular basis <sup>50</sup> , against a set of Air Quality Objectives (AQOs) <sup>51</sup> . Local authorities are required to declare as Air Quality Management Areas (AQMAs) <sup>52</sup> where AQOs are exceeded. Central and Eastern Berkshire and adjacent authorities have AQMAs delineated for parts of their areas for which Air Quality Action Plans (AQAP) have been prepared. AQAPs are often integrated with Local Transport Plans (LTP). AQMAs will need to be considered when making any decisions on routing. <b><u>This will include the</u></b>	The additional text is to clarify that AQMAs in adjacent planning areas will be taken into account as raised by Slough Borough Council and outlined in the Statement of Common Ground.



Ref.	Policy / Para.	Page	Proposed modification	Justification
			<b><u>potential for impacts of lorry movements on AQMAs in adjacent local planning authority areas.</u></b>	
AM16	Policy DM9 / 5.94	47	<b><u>The Central and Eastern Berkshire Authorities are committed to ensuring that minerals and waste development takes place in conformity with the planning permissions granted. If a minerals or waste development is not being operated in accordance with the planning permission, or associated agreed schemes, the relevant Authority will take the necessary steps to ensure compliance, where it is expedient to do so. This may include taking enforcement action to ensure that any breach of planning permission is rectified.</u></b> It is expected, where relevant, that other regulatory bodies or functions (such as the Environment Agency, Health and Safety Executive or Environmental Health) will ensure that the impacts within their remit will be satisfactorily addressed.	Additional text to clarify the monitoring and enforcement approach by the Authorities as raised by Wraysbury Parish Council in their Regulation 19 response.
AM17	Policy DM10 / 5.101	49	Proposals in identified areas of flood risk will need to demonstrate that the development of the site will be safe and not result in increased flood risk. Such developments will require the Sequential Test and, where appropriate the Exception Test, to be carried out together with site specific Flood Risk Assessments. Where a flood risk is identified, development should only occur where the Exceptions Test in national guidance has been met. A development without a Flood Risk Assessment (FRA), where one is required, will not be supported. <b><u>Reference should be made to Tables 1 to 3 within the Planning Practice Guidance<sup>xx</sup> to determine which development are acceptable or not in each Flood Zone.</u></b>	Additional wording to clarify that reference needs to be made to Tables 1 to 3 in the Planning Practice Guidance as raised by the Environment Agency in their Reg 19 response.

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<sup>xx</sup> <u>Planning Practice Guidance (Paragraph: 065 Reference ID: 7-065-20140306, Paragraph: 066 Reference ID: 7-066-20140306, Paragraph: 067 Reference ID: 7-067-20140306) - <a href="https://www.gov.uk/guidance/flood-risk-and-coastal-change">https://www.gov.uk/guidance/flood-risk-and-coastal-change</a></u>	
AM18	Policy DM11 / 5.108	50/51	Planning applications should be supported by a Hydrological Risk Assessment which evaluates the impact on surface and groundwater from the proposed operations. A management scheme will need to be agreed for the construction, operation and restoration phases of development. <b><u>Sites which are adjacent to, or include, a main river will also require an environmental permit.</u></b>	Additional wording to clarify the need for an environmental permit when sites are located adjacent to or include a main river as raised by the Environment Agency in their Reg 19 response.
AM19	Policy DM11 / 5.112	51	All minerals and waste proposals must include measures to ensure the achievement of both no deterioration and improved ecological status of all waterbodies within the site and/or hydrologically connected to the site. Where relevant a Hydrogeological Risk Assessment will be required to demonstrate the effects of the proposed development on the groundwater environment and how these may be mitigated to an acceptable level. <b><u>This is in line with N7 'Hydrogeological Risk Assessment' of The Environment Agency's approach to groundwater protection<sup>xx</sup></u></b> . Such assessments should include a consideration of impacts on near-by abstraction licences; risk to the principal aquifer; cumulative impacts of the neighbouring quarry sites; groundwater quality in relation to impacts on neighbouring potable abstractions and adjacent waste sites; and monitoring.  <sup>xx</sup> <u>The Environment Agency's guidance to groundwater protection (Environment Agency, Feb 2018) -</u>	

Ref.	Policy / Para.	Page	Proposed modification			Justification
			<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf</a>			
AM20	Policy DM11 / 5.119	54	Road safety and capacity are issues of paramount importance. <b>National Highways England</b> is responsible for considering assessments of the transport impacts of minerals or waste development on the Strategic Road Network. The Highways authorities, including the Central and Eastern Berkshire Authorities, are responsible for considering assessments of the transport impacts on the local highway network. In addition to potential capacity congestions, and safety impacts along the highway network, the potential and perceived impact of transportation on amenity may include vibration, visual intrusion and impacts on air quality. It is therefore beneficial for mineral and waste development to be located either close to the Strategic Road Network, or where there is potential for the sustainable movement of materials and/or where operational road miles can be minimised.			Update in agency name following rebranding in August 2021.
AM21	Policy DM11 / 5.126	56	<b>Monitoring Issue</b>	<b>Monitoring Indicator</b>	<b>(Threshold) for Policy Review</b>	Update in agency name following rebranding in August 2021.
			Transport impacts.	Planning permissions against <b>National Highways England</b> advice	Number of planning permissions against <b>National Highways England</b> advice > 0	
				Planning permissions against Local Highway Authority advice	Number of planning permissions against Local Highway Authority advice > 0	

Ref.	Policy / Para.	Page	Proposed modification	Justification
AM22	Policy M2 / 6.41	73	<p>Developers are responsible for preparing a Mineral Resource Assessment which will need to assess the actual or potential commercial value of the underlying mineral deposit. <b><u>In preparing the Mineral Resource Assessment, consideration should be given to available guidance such as the Minerals Safeguarding Guidance prepared by the Minerals Products Association and Planning Officers Society<sup>xx</sup></u></b>. The developer should determine the type, depth and quality of sand and gravel deposits within the site. In order to demonstrate that prior extraction has been fully considered, the developer must undertake an assessment of the practicality of prior extraction, either for use in the development itself or elsewhere.</p> <p><sup>xx</sup><b><u>Mineral Safeguarding Guidance (MPA/POS, April 2019)</u></b>  <a href="https://www.mineralproducts.org/Publications/Resource-Use.aspx">https://www.mineralproducts.org/Publications/Resource-Use.aspx</a></p>	Additional text to provide further guidance on preparing a Mineral Resource Assessment.
AM23	Policy M2 / 6.42	73	<p>In reviewing the potential for prior extraction developers should consider whether the extraction of part of the sand and gravel deposit within the site can be undertaken in terms of <b><u>feasibility and viability</u></b>, even if removal of the entire deposit appears impractical. This might apply, for example, in a case – perhaps on a site close to land liable to flood where the removal of the upper levels of the deposit could be undertaken, whereas the removal of the entire deposit would render the land unsuitable without the importation of inert material to raise the ground level above flood levels. <b><u>Consideration should also be given to on-site use of the material or local operators that could extract and process the material.</u></b></p>	Additional text to provide further guidance on preparing a Mineral Resource Assessment.
AM24	Policy M2 / 6.44	73	<p>Alternatively, the policy includes provision for temporary developments and can allow specific projects of demonstrable overriding importance in the Central &amp; Eastern Berkshire Authorities' Local Plans to proceed. <b><u>These are defined as being those that are required to ensure the delivery of Local Plans (such</u></b></p>	Additional text to clarify what is meant by 'specific projects of

Ref.	Policy / Para.	Page	Proposed modification	Justification
			<b><u>as housing development to meet the 5-year housing land supply) or national significant infrastructure projects.</u></b>	demonstrable overriding importance'
AM25	Policy M2 / 6.47	74	A list of safeguarded sites <b><u>including quarries</u></b> (operational and planned) is outlined in Appendix E, <del>and</del> <b><u>It</u></b> will be maintained by the Central & Eastern Berkshire Authorities <b><u>and reported in the Monitoring Report</u></b> . This will be updated as permissions are granted, and sites are completed and no longer require safeguarding.	Text to clarify where the update to Appendix E will be reported.
AM26	Policy M3	76	[Policy box requires realignment with page]	Typo
AM27	Policy M7 / 6.126	90	The Kennet & Avon Canal which joins Bristol and Reading via Newbury is a small waterway and is not considered to have significant potential for freight movement <sup>83</sup> . It is currently unknown whether the River Thames is suitable for freight from Windsor Bridge to Staines Bridge although large barges are able to use this waterway <sup>84</sup> . <del>However, this may be limited as the river is non-tidal from Teddington Lock.</del>	Removal of statement due to clarification by Environment Agency that being non-tidal is not an issue for freight as raised in their Reg 19 response.
AM28	Policy M8 / 6.136	93	Any existing or planned mineral operation including rail depot or wharf will be automatically safeguarded, <del>and a</del> <b><u>A</u></b> list of safeguarded sites will be maintained by the Central & Eastern Berkshire Authorities <b><u>and reported in the Monitoring Report</u></b> . Safeguarded minerals sites will be shown on the Minerals and Waste Safeguarding Area and associated Consultation Area.	Text to clarify where the update to Appendix E will be reported.
AM29	Policy W4 / 7.117	117	and also provide opportunities to host appropriate waste management development, particularly within major areas of development <del>such as at</del>	Removing reference to Grazeley, as through

Ref.	Policy / Para.	Page	Proposed modification		Justification
			<del>Grazeley, a possible Garden Settlement which includes land in Wokingham and Reading.</del>		further work on the Wokingham development plan, Grazeley has been found to no longer be a deliverable site for a garden settlement.
AM30	Appendix B / Category 4	141	Appropriate locations for these activities (including site requirements)	<ul style="list-style-type: none"> <li>• Large scale processing operations can take place in a range of buildings and at different locations. Preference should be given to industrial or degraded sites or sites on or close to existing waste management facilities.</li> <li>• <del>B1</del> B2 and B8 use class designations may potentially be acceptable.</li> <li>• Sites need to be suitable for use by HGVs.</li> <li>• Consideration should be given to the potential for co-location with rail or barge transfer operations.</li> </ul>	Update to reflect change in Use Classes (01.09.2020)

Ref.	Policy / Para.	Page	Proposed modification		Justification
AM31	Appendix C	152	<b>Site Name</b>	<b>Western Employment Area</b>	Update to reflect change in Use Classes (01.09.2020)
			Location	Western Road, Bracknell, RG12 1RE	
			Current use (specify class classification)	B4 <u>E(g)(iii)</u> / B8	
AM32	Appendix C	154	<b>Site Name</b>	<b>Eastern Employment Area</b>	Update to reflect change in Use Classes (01.09.2020)
			Current use (specify class classification)	B4 <u>E(g)(iii)</u> / B8	
AM33	Appendix C	158	<b>Site Name</b>	<b>North of Basingstoke Road</b>	Update to reflect change in Use Classes (01.09.2020)
			Current use (specify class classification)	B1 (G) <u>E(g)(iii)</u> / B2 & B8	
AM34	Appendix C	159	<b>Site Name</b>	<b>Elgar Road</b>	Update to reflect change in Use Classes (01.09.2020)
			Current use (specify class classification)	B1 (G) <u>E(g)(iii)</u> / B2 & B8	
AM35	Appendix C	160	<b>Site Name</b>	<b>Portman Road / Deacon Way Area</b>	Update to reflect change in Use Classes (01.09.2020)

Ref.	Policy / Para.	Page	Proposed modification		Justification
			Location	Portman Road, Reading, RG30 1EA / Deacon Way, Reading, RG30 6AZ	
			Current use (specify class classification)	B4 <b>E(g)(iii)</b> & / B8 & B8	
AM36	Appendix C	163	<b>Site Name</b>	<b>South of Basingstoke Road</b>	Update to reflect change in Use Classes (01.09.2020)
			Location	Whitley	
			Current use (specify class classification)	B4 (C) <b>E(g)(iii)</b> / B2 / & B8	
AM37	Appendix C	170	<b>Site Name</b>	<b>Molly Millars Lane Area (excluding Fishponds Business Park and Mulberry Business Park)</b>	Update to reflect change in Use Classes (01.09.2020)
			Location	Molly Millars Lane, Wokingham, RG14 2RT	
			Current use (specify class classification)	B4 <b>E(g)(iii)</b> / B2 / & B8	
AM38	Appendix C	171	<b>Site Name</b>	<b>Suttons Industrial Park</b>	Update to reflect change in Use Classes (01.09.2020)
			Location	Earley, Reading, RG6 1AZ	



Ref.	Policy / Para.	Page	Proposed modification		Justification
			Current use (specify class classification)	B4 <u>E(g)(iii)</u> / B2 / & B8	
AM39	Appendix C	172	<b>Site Name</b>	<b>Hogwood Lane Business Area (parts)</b>	Update to reflect change in Use Classes (01.09.2020)
			Location	Wokingham	
			Current use (specify class classification)	B1(e) <u>E(g)(iii)</u> / B2	
AM40	Appendix C	173	<b>Site Name</b>	<b>Headley Road Industrial Estate</b>	Update to reflect change in Use Classes (01.09.2020)
			Current use (specify class classification)	B1 (C) <u>E(g)(iii)</u> / B2 / & B8	
AM41	Appendix C	174	<b>Site Name</b>	<b>Headley Park</b>	Update to reflect change in Use Classes (01.09.2020)
			Current use (specify class classification)	B1 (C) <u>E(g)(iii)</u> / B2 / & B8	
AM42	Appendix C	175	<b>Site Name</b>	<b>Rushcombe Business Park (parts)</b>	Update to reflect change in Use Classes (01.09.2020)
			Current use (specify class classification)	B4e <u>E(g)(iii)</u> / B2 / & B8	

Ref.	Policy / Para.	Page	Proposed modification		Justification
AM43	Appendix C	176	<b>Site Name</b>	<b>Nine Mile Ride Industrial Park</b>	Update to reflect change in Use Classes (01.09.2020)
			Current use (specify class classification)	B4e <b>E(g)(iii)</b> / B2 / <b>&amp;</b> B8	
AM44	Appendix C	178	<b>Site Name</b>	<b>Cutbush Lane Business Area</b>	Update to reflect change in Use Classes (01.09.2020)
			Current use (specify class classification)	B4a / B4e <b>E(g)(iii)</b> / B8	
AM45	Glossary	201	Strategic Road Network: The SRN is made up of motorways and trunk roads, the most significant 'A' roads. The SRN is managed by <b>National</b> Highways England. All other roads in England are managed by local and regional authorities.		Update in agency name following rebranding in August 2021.

## Initial Equalities Screening Record Form

<b>Date of Screening:</b> January 2022	<b>Directorate:</b> Place, Planning and Regeneration	<b>Section:</b> Planning
<b>1. Activity to be assessed</b>	Proposed Main Modifications to the Joint Central and Eastern Berkshire Minerals and Waste Local Plan	
<b>2. What is the activity?</b>	<input checked="" type="checkbox"/> Policy/strategy <input type="checkbox"/> Function/procedure <input type="checkbox"/> Project <input type="checkbox"/> Review <input type="checkbox"/> Service <input type="checkbox"/> Organisational change	
<b>3. Is it a new or existing activity?</b>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Existing	
<b>4. Officer responsible for the screening</b>	Sue Scott, Development Plan Team Manager	
<b>5. Who are the members of the screening team?</b>	Max Baker, Head of Planning	
<b>6. What is the purpose of the activity?</b>	<p>Bracknell Forest Council, Reading Borough Council, the Royal Borough of Windsor and Maidenhead and Wokingham Borough Council are working jointly on finalising the Central and Eastern Berkshire Minerals and Waste Plan (CEBJMWP) with technical support from Hampshire Services of Hampshire County Council.</p> <p>The CEBJMWP has been submitted to Government and is currently at examination where it is being assessed by independent Inspectors who are looking at whether the plan has been prepared in accordance with legal and procedural requirements, and, whether or not it is sound. A number of Proposed Main Modifications have been identified that are considered necessary to make the plan sound and legally compliant.</p> <p>If adopted, the Plan will provide an up to date planning framework for minerals and waste development in Central and Eastern Berkshire to 2036 and will replace the Replacement Minerals Local Plan for Berkshire (incorporating the alternations adopted in December 1997 and May 2001) and the Waste Local Plan for Berkshire (adopted 1998).</p> <p>Link to further information;  <a href="http://bracknell-forest.gov.uk">Joint Minerals and Waste Plan   Bracknell Forest Council (bracknell-forest.gov.uk)</a></p>	
<b>7. Who is the activity designed to benefit/target?</b>	<p>The Proposed Main Modifications are considered necessary to make the plan sound and legally compliant. If supported, this will assist in the ability to achieve a plan that can be adopted and provide an up to date planning framework for minerals and waste development in the area.</p> <p>It will provide landowners and minerals and waste operators with better information about where and on what basis planning permission is likely to be granted for new development. Residents and businesses in and near Central and Eastern Berkshire will benefit as users of minerals (through for example housing and commercial developments, and infrastructure including road maintenance) and as producers of waste. It will provide residents and businesses with greater clarity on where future minerals and waste developments are likely to be located and the degree of protection of amenity and protection of the existing environment sought. The required approach to restoration</p>	

	proposals will also be given. Future generations will benefit from economic minerals not being 'sterilised' by non-minerals development (i.e. they are still available for extraction).	
<b>Protected Characteristics</b>	<p><b>Is there an equality impact?</b> If so, what kind of equality impact may there be, and is the impact positive or adverse or is there a potential for both?</p>	<p><b>What evidence do you have to support this?</b> E.g. equality monitoring data, consultation results, customer satisfaction information etc Please add a narrative to justify your claims around impacts and describe the analysis and interpretation of evidence to support your conclusion as this will inform members decision making, include consultation results/satisfaction information/equality monitoring data</p>
<b>8. Disability Equality – this can include physical, mental health, learning or sensory disabilities including conditions such as dementia.</b>	Neutral impact (see third column).	The Proposed Main Modifications relate to the submitted plan which is concerned with the future need for minerals and waste management developments and how these needs can be met. They involve amendments to certain policies and supporting text in the plan that are considered necessary to make the plan sound and legally compliant, in order to address concerns raised by either the Inspectors or other representors during the examination process. They are highly unlikely to have a specific impact, either positive or negative, on any of the protected groups, to any lesser or greater extent than the general population. Therefore, there is not considered to be any equality impact.
<b>9. Racial equality</b>	Neutral impact (see third column).	The Proposed Main Modifications relate to the submitted plan which is concerned with the future need for minerals and waste management developments and how these needs can be met. They involve amendments to certain policies and supporting text in the plan that are considered necessary to make the plan sound and legally compliant, in order to address concerns raised by either the Inspectors or other representors during the examination process. They are highly unlikely to have a specific impact, either positive or negative, on any of the protected groups, to any lesser or greater extent than the general population. Therefore, there is not considered to be any equality impact
<b>10. Gender equality</b>	Neutral impact (see third column).	The Proposed Main Modifications relate to the submitted plan which is concerned with the future need for minerals and waste management developments and how these needs can be met. They involve amendments to certain policies and supporting text in the plan that are considered necessary to make the plan sound and legally compliant, in order to address concerns raised by either the Inspectors or other representors during the examination process. They are highly unlikely to have a specific impact, either positive or negative, on any of the protected groups, to any lesser or greater extent than the general population. Therefore, there is not considered to be any equality impact
<b>11. Sexual orientation equality</b>	Neutral impact (see why in the third column).	The Proposed Main Modifications relate to the submitted plan which is concerned with the future need for minerals and waste management developments and how these needs can be met. They involve amendments to certain policies and supporting text in the plan that are considered necessary to make the plan sound

		and legally compliant, in order to address concerns raised by either the Inspectors or other representors during the examination process. They are highly unlikely to have a specific impact, either positive or negative, on any of the protected groups, to any lesser or greater extent than the general population. Therefore, there is not considered to be any equality impact
<b>12. Gender re-assignment</b>	Neutral impact (see third column).	The Proposed Main Modifications relate to the submitted plan which is concerned with the future need for minerals and waste management developments and how these needs can be met. They involve amendments to certain policies and supporting text in the plan that are considered necessary to make the plan sound and legally compliant, in order to address concerns raised by either the Inspectors or other representors during the examination process. They are highly unlikely to have a specific impact, either positive or negative, on any of the protected groups, to any lesser or greater extent than the general population. Therefore, there is not considered to be any equality impact
<b>13. Age equality</b>	Neutral impact (see third column).	The Proposed Main Modifications relate to the submitted plan which is concerned with the future need for minerals and waste management developments and how these needs can be met. They involve amendments to certain policies and supporting text in the plan that are considered necessary to make the plan sound and legally compliant, in order to address concerns raised by either the Inspectors or other representors during the examination process. They are highly unlikely to have a specific impact, either positive or negative, on any of the protected groups, to any lesser or greater extent than the general population. Therefore, there is not considered to be any equality impact
<b>14. Religion and belief equality</b>	Neutral impact (see third column).	The Proposed Main Modifications relate to the submitted plan which is concerned with the future need for minerals and waste management developments and how these needs can be met. They involve amendments to certain policies and supporting text in the plan that are considered necessary to make the plan sound and legally compliant, in order to address concerns raised by either the Inspectors or other representors during the examination process. They are highly unlikely to have a specific impact, either positive or negative, on any of the protected groups, to any lesser or greater extent than the general population. Therefore, there is not considered to be any equality impact
<b>15. Pregnancy and maternity equality</b>	Neutral impact (see third column).	The Proposed Main Modifications relate to the submitted plan which is concerned with the future need for minerals and waste management developments and how these needs can be met. They involve amendments to certain policies and supporting text in the plan that are considered necessary to make the plan sound and legally compliant, in order to address concerns raised by either the Inspectors or other representors during the examination process. They are highly unlikely to have a specific impact, either positive or negative, on any of the protected groups, to any lesser or greater extent than the general population. Therefore, there is not considered to be any equality impact

<b>16. Marriage and civil partnership equality</b>	Neutral impact (see third column).	The Proposed Main Modifications relate to the submitted plan which is concerned with the future need for minerals and waste management developments and how these needs can be met. They involve amendments to certain policies and supporting text in the plan that are considered necessary to make the plan sound and legally compliant, in order to address concerns raised by either the Inspectors or other representors during the examination process. They are highly unlikely to have a specific impact, either positive or negative, on any of the protected groups, to any lesser or greater extent than the general population. Therefore, there is not considered to be any equality impact	
<b>17. Please give details of any other potential impacts on any other group (e.g. those on lower incomes/carers/ex-offenders, armed forces communities) and on promoting good community relations.</b>	Overall the plan aims to improve social wellbeing by ensuring that sufficient minerals are provided for construction projects, including all types of housing and that waste produced in the plan area can be managed in accordance with the waste hierarchy. It also seeks to protect the environment and economic prospects of the area.		
<b>18. If an adverse/negative impact has been identified can it be justified on grounds of promoting equality of opportunity for one group or for any other reason?</b>	N/A		
<b>19. If there is any difference in the impact of the activity when considered for each of the equality groups listed in 8 – 14 above; how significant is the difference in terms of its nature and the number of people likely to be affected?</b>	No negative impacts have been identified in respect of any of the groups listed in 8 – 16 above.		
<b>20. Could the impact constitute unlawful discrimination in relation to any of the Equality Duties?</b>		N	No.
<b>21. What further information or data is required to better understand the impact? Where and how can that information be obtained?</b>	The CEBJMWP has already been through various rounds of consultation: 'Issues and Options' (Summer 2017); Draft Plan consultation setting out the proposed approach (Summer/Autumn 2018); Bray Quarry extension consultation (Summer 2019); Focussed consultation on criteria for defining an 'Area of Search' for sand and gravel provision, two new sites for sand and gravel (one in Wokingham Borough and one in the Royal Borough of Windsor and Maidenhead), and a possible policy on past performance of minerals and waste operators (Spring of 2020); Proposed Submission version (September/October 2020).		

	As the plan is now at examination, the Council no longer has the same ability to influence the content of the plan as it did at earlier stages.		
	Assuming that the CEBJMWP is adopted, it will form part of the statutory development plan for Bracknell Forest and therefore its planning policies will be monitored as part of the Authority Monitoring Report.		
<b>22. On the basis of sections 7 – 17 above is a full impact assessment required?</b>		N	Full assessment not required as no potentially negative impacts have been identified, and the plan has already been subject to various rounds of public consultation.
<b>23. If a full impact assessment is not required; what actions will you take to reduce or remove any potential differential/adverse impact, to further promote equality of opportunity through this activity or to obtain further information or data?</b> Please complete the action plan in full, adding more rows as needed.			
<b>Action</b>	<b>Timescale</b>	<b>Person Responsible</b>	<b>Milestone/Success Criteria</b>
Consultation on the Proposed Main Modifications to the Submission version	February/March 2022	Executive decision	Executive approves the Proposed Main Modifications to the submitted plan and agrees consultation.
Submission of responses received, as a result of the above consultation, to the Planning Inspectors.	Spring 2022	Hampshire Services on behalf of all four commissioning authorities	Confirmation of receipt of responses by Planning Inspectors and subsequent consideration ultimately leading to Inspector's Report.
Assuming that the CEBJMWP can ultimately be adopted, monitor the effectiveness or otherwise of planning policies.	Ongoing following adoption of the Plan	Development Plan Team	As decisions on planning applications are made using policies in the CEBJMWP (both delegated, committee and appeals), an understanding of the effectiveness of the policies will be gained.
<b>24. Which service, business or work plan will these actions be included in?</b>	Planning		
<b>25. Please list the current actions undertaken to advance equality or examples of good practice identified as part of the screening?</b>	<p>Previous rounds of consultation:  'Issues and Options' (Summer 2017);  Draft Plan consultation setting out the proposed approach (Summer/Autumn 2018);  Bray Quarry extension consultation (Summer 2019);  Focussed consultation on criteria for defining an 'Area of Search' for sand and gravel provision, two new sites for sand and gravel (one in Wokingham Borough and one in the Royal Borough of Windsor and Maidenhead), and a possible policy on past performance of minerals and waste operators (Spring of 2020);  Various 'calls for sites'  Proposed Submission version (September/October 2020).</p>		

	Responses received to the various consultations have been reviewed and where appropriate, have helped formulate the approach taken in the CEBJMWP. As the plan is now at examination, the Council no longer has the same ability to influence the content of the plan as it did at earlier stages.
<b>26. Head of Planning signature.</b>	Signature: _____ Date: _____



**TO: THE EXECUTIVE  
08 FEBRUARY 2022**

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**CAPITAL PROGRAMME 2022/2023 - 2024/2025  
(Chief Executive/Director: Resources)**

**1 PURPOSE OF REPORT**

- 1.1 As part of the Council's financial and policy planning process, the Executive issued draft Capital Programme proposals for 2022/23 – 2024/25 for consultation on 14 December 2021. The main focus was inevitably departmental spending needs for 2022/23, although future years' schemes do also form an important part of the programme. This report sets out the final proposed capital programme, following the consultation exercise, for consideration by the Executive prior to submission to the Council on 23rd February 2022. The revenue implications of the recommendations in this report are reflected in the subsequent report on the Council's revenue budget proposals. Any revisions to the proposals put forward for each service would also need to be reflected in the revenue budget report.

**2 RECOMMENDATIONS**

**That the Executive:**

**2.1 Recommends to the Council**

- a) General Fund capital funding of £16.311m for 2022/23 in respect of those schemes listed in Annexes A – D**
- b) Approves the inclusion of £7.037 of expenditure to be externally funded (including £1.133m of S106 funding) as outlined in paragraph 5.19.**
- c) That those schemes that attract external grant funding are included within the Capital Programme at the level of funding received.**
- d) Agrees that capital schemes that require external funding can only proceed once the Council is certain of receiving the grant**
- e) The inclusion of an additional budget of £1m for Invest to Save schemes.**
- f) Approve the virement of £35k within the 2021/22 Schools Capital Programme as outlined in paragraph 5.29**

**3 REASONS FOR RECOMMENDATIONS**

- 3.1 The reasons for the recommendations are set out in the report.

**4 ALTERNATIVE OPTIONS CONSIDERED**

- 4.1 The alternative options are considered in the report.

**5 SUPPORTING INFORMATION**

## **Capital Resources**

- 5.1 Each year the Council agrees a programme of capital schemes. In the past these schemes have been funded from these main sources:
- the Council's capital receipts
  - Government Grants
  - other external contributions
  - internal and external borrowing
- 5.2 The Council's total usable capital receipts at 31<sup>st</sup> March 2021 are zero as all receipts have been applied to fund prior capital investment – all receipts during 2021/22 will be used to finance the 2021/22 Capital Programme. The Council is partly reliant on capital receipts and other contributions to fund its capital programme, although interest generated from capital receipts can also help support the revenue budget in the short term. However, with investment rates at historic lows it makes more economic sense to offset borrowing.
- 5.3 The proposed capital programme for 2022/23 has been developed, therefore, on the assumption that it will be funded by a combination of Government grants, other external contributions, capital receipts and borrowing only if required. Community Infrastructure Levy (CIL) contributions and some small miscellaneous property sales should enable £3.25m of the capital programme to be funded from receipts. Internal resources will be used in the first instance and borrowing from external sources (e.g. the PWLB) will be used only when necessary. The financing costs associated with the General Fund Capital Programme have been provided for in the Council's revenue budget plans which also appear on tonight's agenda.

### **Invest-to-Save**

- 5.4 The Council has for many years allocated £1m each year within its capital programme proposals to be available to fund capital investment in schemes that will make a return either through revenue savings or income generation, at least equal to the cost of the financing. This has proved successful in recent years. The key criteria used to assess proposals to access this funding is that the investment needs to recover the cost of the financing (i.e. repay the amount and the interest associated with the borrowing) over time. This recognises that many initiatives, including some related to climate change, will have an element of future cost savings. Furthermore there will be opportunities where a mix of funding could be utilised where the total savings do not cover the full costs, meaning that a mix of Invest-to-Save and other funding sources can be used to achieve the level of investment needed to support policy initiatives.

### **New Schemes**

- 5.5 Within the general financial framework outlined above, Service Departments have considered new schemes for inclusion within the Council's Capital Programme for 2022/23 – 2024/25. Given that both capital and revenue resources are under pressure, each Department has evaluated and prioritised proposed schemes into broad categories in line with the Council's agreed Asset Management Plan approach. Having done this, only the very highest priority schemes and programmes are being recommended for inclusion in the Capital Programme.

### **Other Unavoidable & Committed schemes**

- 5.6 This category covers schemes which must proceed to ensure that the Council is not left open to legal sanction and includes items relating to health and safety issues, new legislation etc. Committed schemes also include those that have been started as part of the 2021/22 Capital Programme – major schemes started in 2021/22

which have not yet completed will be carried forward as per normal capital expenditure rules. Also included within this category are those schemes that were previously funded from the General Fund Revenue Account, but which by their nature could be legitimately capitalised, thereby reducing pressure on the revenue budget. Schemes in this category form the first call on the available capital resources.

**Maintenance (Improvements and capitalised repairs)**

5.7 The figures below are based on the information held in the Building Groups' property management system as of August 2021. In addition to this, several more comprehensive surveys have been included namely the Commercial Depot, Waterside Park and a major update of the Council's housing stock. The Commercial Depot makes up almost £2m of Corporate Property's priority costs and should be viewed in light of the proposals for its re-development which are included in this report.

5.8 The Council's overall maintenance liability remains in the region of £80m (see table below). In line with the policy adopted in previous years the Asset Management Board (AMB) has considered only those works that fall within categories 1C and 1D. Given the financial constraints on both the revenue and capital budgets an allocation of £1.587m is recommended to address the most pressing 1C & 1D priorities.

		£ (000)	£ (000)
Schools	Priority 1C & 1D	2,352	
	Priority 2C & 2D	11,320	
	Lower Priorities	30,968	44,640
Corporate Properties	Priority 1C & 1D	1,936	
	Priority 2C & 2D	8,176	
	Lower Priorities	14,289	24,401
Total			<b>79,001</b>

5.9 There are remaining Landlord liabilities left with the Council with regard to the Leisure sites and based on updated condition surveys these works are necessary in order for the Council to fulfil these responsibilities. The table below summarises the key investment areas for planned maintenance in 2022/23

Area	£
Car Parking	100,000
Commercial Estate	160,000
Corporate Buildings	100,000
Housing	250,000
Leisure	320,000
Other	232,000
South Hill Park	210,000

- 5.10 Some works, whilst urgent, cannot be legitimately capitalised and must be met from a revenue budget. An overall allowance of £200,000 is available to meet these liabilities; however this will not be sufficient to meet the level of works that continue to be identified within the 1C and 1D categories considered to be of a revenue nature. It is becoming clear that there is a diminishing proportion of the 1C and 1D works that can be legitimately met from the Capital Budget. Unless additional revenue funds are identified then the level of outstanding works will increase. These combined bids will go some way to addressing the most urgent works within the estimated backlog identified above, with the potential to resolve some of the works currently prioritised as 1C and 1D. However, other essential, albeit slightly lower priority, works will still remain. The implications of failing to maintain buildings are progressive deterioration leading to building closures, health & safety problems, service delivery impacts and reduced property values.

### **Schools**

- 5.11 Identified planned maintenance for 2022/23 will be drawn from building condition surveys carried out by the Council's Managing Partner Atkins Ltd and there is approximately £2.352m of Priority 1 (Urgent) planned maintenance works in schools on the current building condition surveys. Capital funding for planned maintenance is allocated for schools, but non school buildings (Youth Service, Childrens Social Care, Adult Learning and Early Years) form part of the Council-Wide programme. The Asset Management Board recommends the Council-Wide programme of works, and the Schools Planned Works Programme Board recommends the programme of works for schools.
- 5.12 A Schools Planned Works Programme of £2m is being put forward based on the level of grant expected to be received from DfE. This includes Planned Maintenance, Fire Safety, Asbestos and Legionella works which is normally funded from DfE Schools Capital Maintenance Grant. The programme of works will be matched to the available budget.

### **ICT Schemes**

- 5.13 To support new ways of working that have become the norm in recent times, the Council will be required to invest in technology and IT infrastructure over the coming years. Some of the key areas are highlighted below and more details on specific areas of spend are laid out in the Annexes.
- Investment in additional home-working equipment
  - Laptop refresh and replacement programme
  - Core Network Upgrades

### **Rolling programmes**

- 5.14 These programmes cover more than one year and give a degree of certainty for forward planning schemes to improve service delivery. They make an important contribution towards the Council's established Asset Management Plans.

### **Other Desirable Schemes**

- 5.15 In addition to the schemes identified in the above categories, each service has requested funding for other high priority schemes that meet the needs and objectives of their service. The net cost of schemes which attract partial external funding are included in the schemes put forward.

## Capital Programme 2022/23 – 2024/25

- 5.16 A summary of the cost of new schemes proposed by Departments is set out in the table below and in Annex A. A detailed list of suggested schemes within the draft capital programme, together with a brief description of each project, for each service is included in Annexes B – D.
- 5.17 A number of amendments have been made during the consultation period as outlined below.
- **New Scheme - Play Area Renewal Schemes (£160k)**  
Many of the borough’s play sites are now old and equipment is reaching the end of its end of its lifespan. Historically the council has replaced the equipment within one play area per year to try and keep pace with the inevitable loss of equipment over time, as pieces become beyond economical repair. The Play Area renewal project priorities for 22/23 will be at Snaprails Park in Sandhurst and at South Hill Park
  - **New Scheme - Transplant Field Bridge at Shepherd Meadows (£55k)**  
The Transplant Field Bridge at Shepherd Meadows is an essential part of the site. The bridge is relied upon by the public because without it the most popular circular walk would not be possible leaving half the site only accessible after a mile-long linear ‘out and back’ walk. Not replacing the bridge will significantly restrict public access, preventing circular walks, taking in both sides of a beautiful riverside location.
  - **New Scheme - Borough Greening and Security (£300k)**  
There are specific areas in the Borough in need to substantial maintenance and renewal. In some cases, these works can be capitalised, whilst others are of a revenue nature. As such a budget package is being proposed, being a mix of Capital and Revenue to achieve the aspirations of Members
  - **Change in Budget – Garth Hill Balconies**  
Working alongside the Council’s insurers and seeking specialist advice, a detailed feasibility study has been undertaken and has identified a lower cost scheme that addresses the initial concerns and satisfies all parties. This has reduced the initial estimate from £700k to £150k.
- 5.18 Total requested Council funding for schemes amounts to £9.274m, which includes £5.285m for schemes that have been committed in previous years and will continue into 2022/23.

<b>Capital Programme 2022/23-2024/25</b>				
<b>Annex</b>	<b>Service Area</b>	<b>2022/23 £000</b>	<b>2023/24 £000</b>	<b>2024/25 £000</b>
B	Delivery	8,099	4,411	1,947
C	People	3,783	0	0
D	Central Directorates	4,429	2,820	2,820

	<b>Total Capital Programme</b>	<b>16,311</b>	<b>7,231</b>	<b>4,767</b>
	less Externally Funded schemes	7,037	2,820	2,340
	<b>Council Funded Programme</b>	<b>9,274</b>	<b>4,411</b>	<b>2,427</b>

### Externally Funded Schemes

- 5.19 A number of external funding sources are also available to fund schemes within the capital programme. External support has been identified from two main sources:

#### Government Grants

A number of capital schemes attract specific grants. It is proposed that all such schemes should be included in the capital programme at the level of external funding that is available.

A significant element of the grant-funded capital programme relates to the planned investment in Schools. The schools investment programme included in this report reflects the highest priority schemes identified by the Department and the Education Capital Programme Board. However as a result of a change to the capital funding formula and the perceived relative need for school places in Bracknell compared to other areas of the country, the Council has received no Basic Needs Grant (BNG) in 2018/19 and only £0.735m in 2019/20. The allocation for 2021/22 suggests there will be no grant funding available to Bracknell Forest in 2022/23. However the Council has identified a number of schemes that require funding in the coming years and are set out in Annex B.

A second key constituent of capital grant funding relates to the Highway Maintenance and the Integrated Transport Block totalling £2.614m for 2022/23.

#### Section 106 (£1.133m)

Each year the Council enters into a number of agreements under Section 106 of the Town & Country Planning Act 1990 by which developers make a contribution towards the cost of providing facilities and infrastructure that may be required as a result of their development. Usually the monies are given for work in a particular area and/or for specific projects

Officers have identified a number of schemes that could be funded from Section 106 funds in 20202223, where funding becomes available. These are summarised below

<b>Department</b>	<b>Schemes</b>	<b>Budget</b>
		<i>£000</i>
Delivery	Warfield Memorial Grounds	150
People	10a Portman Close Flats	250
People	Warfield Migration Works	483
People	Garth Hill College	150
Central	Local Transport Plan Schemes	100
	<b>Total</b>	1,133

### **On-going Revenue Costs**

- 5.20 There are £30k revenue costs associated with the schemes proposed for inclusion within the 2022/23 Capital Programme. These are reflected in the Revenue Budget report that follows on the agenda.

### **Funding Options**

- 5.21 The Council introduced CIL in April 2015. It is difficult to estimate the potential amount of CIL that will be generated as this will depend on the delivery of additional housing development in the Borough, which is to a large extent outside of the control of the authority. However based on the most recent housing trajectory estimates and knowledge of development schemes that will come forward in the next 18 months, it is estimated that £3.25m is an appropriate assumption. However there is a downside risk to this if the current economic conditions and the impact of the pandemic continue to weigh on the national private-sector housing delivery developments
- 5.22 The proposed capital programme for 2022/23 has been developed, therefore, on the assumption that it will be funded by a combination of approximately £3.25m of capital receipts (CIL and other miscellaneous property disposals), Government grants, other external contributions and borrowing. The financing costs associated with the Capital Programme have been provided for in the Council's revenue budget plans.
- 5.23 Any capital expenditure approved over and above capital receipts and external contributions will require the Council to borrow externally. The timing of this will depend on the level of surplus cash held by the Council which will be used in the first instance to fund the Capital Programme commitments. Any external borrowing will require a sum to be set aside as a Minimum Revenue Provision (MRP) for debt repayment in addition to an interest charge, depending on the maturity of the loan. Current long-term borrowing rates are approximately 2.2%.
- 5.24 The redevelopment of the Depot should result in a capital receipt after the scheme is completed, most likely in 2024, estimated at a potential £1.8m. The Council also expects to receive a capital receipt in a similar timescale from the development of Coopers Hill, in excess of £2m. In addition, the Warfield Memorial Ground Enhancements represent a forward-funding approval that will be met by S106 receipts in future years.
- 5.25 Based on an internally funded Capital Programme of £9.274m (after taking account of potential capital receipts), and with long-term interest costs at 2.2%, the interest cost in 2022/23 would amount to £67k, and £133k in a full year. The MRP charge reflects the life of individual assets that are being funded – the charge is not payable until the year after the assets come into being. The MRP charge in relation to the capital programme for 2022/23 is estimated to be a maximum of £0.208m and will be charged from 2023/24.
- 5.26 Following the introduction of the Prudential Borrowing regime local authorities are able to determine the level of their own capital expenditure with regard only to affordability on the revenue account. In practice this represents the amount of borrowing they can afford to finance and will necessitate taking a medium-term view of revenue income streams and capital investment needs.
- 5.27 To achieve its aim of ensuring that capital investment plans are affordable, prudent and sustainable, the Local Government Act requires all local authorities to set and keep under review a series of prudential indicators included in the CIPFA Prudential Code for Capital Finance in Local Authorities. The Capital Programme recommended in this report can be sustained and is within the prudential guidelines.

Full Council will need to agree the prudential indicators for 2022/23 to 2024/25 in February 2022, alongside its consideration of the specific budget proposals for 2022/23 and the Council's medium-term financial prospects.

- 5.28 If any amendments are made to the capital programme, the revenue consequences will need to be adjusted accordingly. Executive Members will therefore need to consider the impact of the capital programme as part of the final revenue budget decisions. Members will need to carefully balance the level of the Capital Programme in future years against other revenue budget pressures and a thorough review, including the prioritisation of those schemes planned for 2023/24 onwards, will need to be undertaken during next summer.

### **Schools Capital Programme Virement**

- 5.29 An urgent requirement to replace the boilers at Kennel Lane School has arisen and funding is required to carry out this work in the coming weeks. The Schools capital maintenance budget is fully committed however there is budget available within the overall schools capital programme that can be vired to undertake this work. A sum of £35k is required and in line with financial regulations a request is made to approve this virement.

## **6 ADVICE RECEIVED FROM STATUTORY AND OTHER OFFICERS**

### Borough Solicitor

- 6.1 The authorisation for incurring capital expenditure by local authorities is contained in the legislation covering the service areas. Controls on capital expenditure are contained in the Local Government Act 2003 and regulations made thereunder.

### Director: Resources

- 6.2 The financial implications are contained within the report.

### Equalities Impact Assessment

- 6.3 The Council's final budget proposals will potentially impact on all areas of the community. A detailed consultation process is planned in order to provide individuals and groups with the opportunity to comment on the draft proposals. This will ensure that in making final recommendations, the Executive can be made aware of the views of a broad section of residents and service users. Where necessary, impact assessments on specific schemes within the capital programme will be undertaken before work commences.

### Strategic Risk Management Issues

- 6.4 The most significant risk facing the Council is the impact of the capital programme on the revenue budget. The scale of the Council's Capital Programme for 2022/23 will impact upon the revenue budget and will itself be subject to consultation over the coming weeks. All new spending on services will need to be funded from new capital receipts or borrowing. The generation of capital receipts in future years may mitigate the impact on the revenue budget, but as the timing and scale of these receipts is uncertain their impact is unlikely to be significant.
- 6.5 There are also a range of risks that are common to all capital projects which include:
- Tender prices exceeding the budget
  - Planning issues and potential delays
  - Uncertainty of external funding
  - Building delays due to unavailability of materials or inclement weather
  - Availability of staff with appropriate skills to implement schemes



6.6 These can be managed through the use of appropriate professional officers and following best practice in project management techniques. The report also identifies the risk associated with the shortfall in maintenance expenditure compared to that identified by the latest condition surveys. With only those highest priorities receiving funding in 2022/23, there will be a further build up in the maintenance backlog and a risk that the deterioration in Council assets will hamper the ability to deliver good services.

## **7 CONSULTATION**

7.1 See the General Fund Revenue Budget 2022/23 report on tonight's agenda outlining the results of the budget consultation

### Background Papers

None

### Contact for further information

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**CAPITAL PROGRAMME 2022/2023-2024/25  
BY CATEGORY**

	2022/23 £000	2023/24 £000	2024/25 £000	TOTAL £000
<b>Committed</b>	<b>5,285</b>	<b>1,635</b>	<b>1,135</b>	<b>8,055</b>
Delivery	3,835	835	335	5,005
People	250	0	0	250
Central	1,200	800	800	2,800
<b>Unavoidable</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Delivery	0	0	0	0
People	0	0	0	0
Central	0	0	0	0
<b>Maintenance</b>	<b>2,564</b>	<b>1,346</b>	<b>1,092</b>	<b>5,002</b>
Delivery	2,564	1,346	1,092	5,002
People	0	0	0	0
Central	0	0	0	0
<b>Rolling Programme / Other Desirable</b>	<b>1,425</b>	<b>1,430</b>	<b>200</b>	<b>3,055</b>
Delivery	550	1,430	200	2,180
People	360	0	0	360
Central	515	0	0	515
<b>Council Funding</b>	<b>9,274</b>	<b>4,411</b>	<b>2,427</b>	<b>16,112</b>
<b>Total External Funding</b>	7,037	2,820	2,340	12,197
<b>Total Capital Programme</b>	<b>16,311</b>	<b>7,231</b>	<b>4,767</b>	<b>28,309</b>

**CAPITAL PROGRAMME 2022/2023-2024/25  
BY DIRECTORATE**

	2022/23 £000	2023/24 £000	2024/25 £000	TOTAL £000
<b>Delivery</b>	8,099	4,411	1,947	14,457
<b>People</b>	3,783	0	0	3,783
<b>Central Directorates</b>	4,429	2,820	2,820	10,069
<b>Total Capital Programme</b>	<b>16,311</b>	<b>7,231</b>	<b>4,767</b>	<b>28,309</b>
<b>External Funding</b>	7,037	2,820	2,340	12,197
<b>Council Funding</b>	<b>9,274</b>	<b>4,411</b>	<b>2,427</b>	<b>16,112</b>

## CAPITAL PROGRAMME - DELIVERY

	2022/23 £000	2023/24 £000	2024/25 £000	TOTAL £000
<b>Committed</b>				
Commercial Depot Redevelopment	3,100	500	-	3,600
Capitalisation of Project Management costs	300	300	300	900
Equipment Downshire Golf Complex	35	35	35	105
Blue Mountain Health and Community Hub	400	-	-	400
	<b>3,835</b>	<b>835</b>	<b>335</b>	<b>5,005</b>
<b>Unavoidable</b>				
No Schemes	-	-	-	-
<b>Maintenance</b>				
Buildings Planned Maintenance Programme	1,587	1,000	1,000	3,587
IT Schemes	977	346	92	1,415
	<b>2,564</b>	<b>1,346</b>	<b>1,092</b>	<b>5,002</b>
<b>Rolling Programme / Other Desirable</b>				
Warfield Memorial Ground Enhancements	150	1,250	-	1,400
Feasibility Studies	250	100	100	450
CCTV at Car Parks	60	-	-	60
London Road Landfill Works	50	80	100	230
Vehicle Monitoring System	40	-	-	40
	<b>550</b>	<b>1,430</b>	<b>200</b>	<b>2,180</b>
<b>TOTAL REQUEST FOR COUNCIL FUNDING</b>	<b>6,949</b>	<b>3,611</b>	<b>1,627</b>	<b>12,187</b>
<b>External Funding</b>				
Warfield Memorial Ground Enhancements	150	800	320	1,270
Blue Mountain Health and Community Hub	1,000	-	-	1,000
<b>TOTAL EXTERNAL FUNDING</b>	<b>1,150</b>	<b>800</b>	<b>320</b>	<b>2,270</b>
<b>TOTAL CAPITAL PROGRAMME</b>	<b>8,099</b>	<b>4,411</b>	<b>1,947</b>	<b>14,457</b>

## CAPITAL PROGRAMME - PEOPLE

	2022/23 £000	2023/24 £000	2024/25 £000	TOTAL £000
<b>Committed</b>				
10a Portman Close Flats	250	-	-	250
	<b>250</b>	<b>-</b>	<b>-</b>	<b>250</b>
<b>Unavoidable</b>				
No Schemes	-	-	-	-
	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Rolling Programme / Other Desirable Non-Schools</b>				
<b>Departmental Bids:</b>				
Warfield - Migration Highway Works	150	-	-	150
<b>School Bids:</b>				
School Security and Safeguarding	100	-	-	100
Fire Safety	110	-	-	110
<b>Total</b>	<b>360</b>	<b>-</b>	<b>-</b>	<b>360</b>
<b>TOTAL REQUEST FOR COUNCIL FUNDING</b>	<b>610</b>	<b>-</b>	<b>-</b>	<b>610</b>
<b>External Funding - Other</b>				
<b>Non-Schools</b>				
10a Portman Close Flats	250	-	-	250
<b>Schools</b>				
DfE Grant: Schools Capital Maintenance	2,040	-	-	2,040
DfE Grant: Devolved Formula Capital	250	-	-	250
Garth Hill College - Atrium Balconies	150	-	-	150
Warfield - Migration Highway Works	483	-	-	483
	<b>3,173</b>	<b>-</b>	<b>-</b>	<b>3,173</b>
<b>TOTAL EXTERNAL FUNDING</b>	<b>3,173</b>	<b>-</b>	<b>-</b>	<b>3,173</b>
<b>TOTAL CAPITAL PROGRAMME</b>	<b>3,783</b>	<b>-</b>	<b>-</b>	<b>3,783</b>

## CAPITAL PROGRAMME - CENTRAL DIRECTORATE

	2022/23 £000	2023/24 £000	2024/25 £000	TOTAL £000
<b>Committed</b>				
Roads & Footway Resurfacing	200	200	200	600
CIL Strategic Transport Schemes	600	600	600	1,800
Highway Maintenance (Lamp Columns)	400			400
	-	-	-	-
	<b>1,200</b>	<b>800</b>	<b>800</b>	<b>2,800</b>
<b>Unavoidable</b>				
No Schemes				
	-	-	-	-
<b>Maintenance</b>				
	-	-	-	-
<b>Rolling Programme / Other Desirable</b>				
Borough Greening and Safety	300	-	-	300
Snaprails Park - Play Area Renewal	80	-	-	80
South Hill Park - Play Area Renewal	80	-	-	80
Transplant Field Bridge - Shepherd Meadows	55	-	-	55
	-	-	-	-
	<b>515</b>	<b>-</b>	<b>-</b>	<b>515</b>
<b>TOTAL REQUEST FOR COUNCIL FUNDING</b>	<b>1,715</b>	<b>800</b>	<b>800</b>	<b>3,315</b>
<b>External Funding</b>				
Highways Maintenance	1,888	1,300	1,300	4,488
Integrated Transport & Maintenance	726	720	720	2,166
Section 106 Schemes (LTP)	100	-	-	100
	<b>2,714</b>	<b>2,020</b>	<b>2,020</b>	<b>6,754</b>
<b>TOTAL EXTERNAL FUNDING</b>	<b>2,714</b>	<b>2,020</b>	<b>2,020</b>	<b>6,754</b>
<b>TOTAL CAPITAL PROGRAMME</b>	<b>4,429</b>	<b>2,820</b>	<b>2,820</b>	<b>10,069</b>

**TO: THE EXECUTIVE**  
**DATE: 08 FEBRUARY 2022**

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**GENERAL FUND REVENUE BUDGET 2022/23**  
**(Chief Executive/Executive Director:**  
**Resources)**

**1 PURPOSE OF REPORT**

- 1.1 As part of the Council's financial and policy planning process, the Executive agreed draft revenue budget proposals for 2022/23 as the basis for consultation on 14 December 2021.
- 1.2 Over the course of the last two months a number of issues have become clearer, in particular the details of the Local Government Financial Settlement. This report therefore builds on the draft budget proposals agreed by the Executive in December and sets out the Executive's final budget proposals for 2022/23. Once determined, these will be submitted to the Council for consideration on 23 February 2022.
- 1.3 The recommendations of this report are, in part, dependent upon proposals to be considered elsewhere on this agenda in respect of the Capital Programme 2022/23 - 2024/25. Changes to the proposals included within that report may therefore necessitate revisions to the 2022/23 General Fund revenue budget proposals set out below. Should this happen a short adjournment of the meeting might be required.

**2 RECOMMENDATIONS**

**That the Executive, in recommending to Council a budget and Council Tax level for 2022/23:**

- 2.1 **Agrees the provision for inflation of £4.368m (section 8.2);**
- 2.2 **Approves a further council tax discount in 2022/23 of £100 for working age households receiving council tax support and that further consideration be given to discounts in subsequent years' budgets, as summarised in paragraph 8.3.1a) and detailed in Annexe H.**
- 2.3 **Endorses further development of the additional preventative actions aimed at helping households experiencing or at risk of experiencing financial hardship as set out in Annexe H;**
- 2.4 **Confirms the original budget proposals, subject to the revisions in section 8.3.1b) – 8.3.1j) and those decisions to be taken elsewhere on this agenda on the capital programme;**
- 2.5 **Agrees the additional budget proposals as set out in Annexe A and Annexe D and in sections 6.2 (RSG), 6.3 (specific grants), 6.4 (business rates), 7.3 (collection fund) and 8.3 (updated pressures & savings);**
- 2.6 **Agrees that the Council should make additional funding available for distribution to schools through the local funding formula at the level set out in section 9.1 subject to any minor amendments made by the Executive Member for Children,**

**Young People and Learning following the receipt of definitive funding allocations for High Needs pupils;**

- 2.7 Includes a general contingency totalling £1.900m (section 10.7) use of which is to be authorised by the Chief Executive in consultation with the Executive Director: Resources in accordance with the delegations included in the Council’s constitution;**
- 2.8 Subject to the above recommendations, confirms its support for the draft budget proposals;**
- 2.9 Approves the Net Revenue Budget before allowance for additional interest from any use of balances as set out in Annexe G;**
- 2.10 Agrees the contribution of £>.>>>m to be made from revenue balances (before additional interest from the use of balances) to support revenue expenditure;**
- 2.11 Recommends a >.>>% increase in the Council Tax for the Council’s services and that the Council Tax requirement, excluding Parish and Town Council precepts, be set as £>>.>>>m;**
- 2.12 Recommends that the Council Tax for the Council’s services and that each Valuation Band is set as follows:**

Band	Tax Level Relative to Band D	£
A	6/9	>>>>.>>
B	7/9	>>>>.>>
C	8/9	>>>>.>>
D	9/9	>>>>.>>
E	11/9	>>>>.>>
F	13/9	>>>>.>>
G	15/9	>>>>.>>
H	18/9	>>>>.>>

- 2.13 Recommends that the Council approves the following indicators, limits, strategies and policies included in Annexe E:**

- **The Prudential Indicators and Limits for 2022/23 to 2024/25 contained within Annexe E(i);**
- **The Minimum Revenue Provision (MRP) Policy contained within Annexe E(ii);**
- **The Treasury Management Strategy Statement, and the Treasury Prudential Indicators contained in Annexe E(iii);**
- **The Authorised Limit Prudential Indicator in Annexe E(iii);**
- **The Investment Strategy 2022/23 to 2024/25 and Treasury Management Limits on Activity contained in Annexe E(iv);**

**3 REASONS FOR RECOMMENDATIONS**

- 3.1 The recommendations are designed to enable the Executive to propose a revenue budget and Council Tax level for approval by Council on 23 February.**



## 4 ALTERNATIVE OPTIONS CONSIDERED

4.1 Background information relating to the options considered is included in the report.

## 5 SUPPORTING INFORMATION

### Basis of Draft Budget Proposals

- 5.1 At its meeting on 14 December 2021, the Executive considered the expected overall position facing the Council in setting a budget for 2022/23. At the time the Executive agenda was published, the Provisional Local Government Financial Settlement had not been announced. The budget proposals were therefore based on high level information included in the Government's 2021 Spending Review (SR21) which was published on 27 October 2021 alongside the Autumn Budget.
- 5.2 As SR21 did not include details of funding at individual council level, assumptions were made in the draft budget proposals on how funding streams such as the £1.6bn of additional funding for social care and other services and any New Homes Bonus would be allocated. In this broad context, the Executive published its draft budget proposals, which were open for consultation for a six week period.
- 5.3 In the face of significant pressures on Local Government expenditure and grant funding, the scope to invest in new service provision is severely restricted. Many of the pressures accommodated in the budget package are simply unavoidable as they relate to current levels of demand or legislation changes.
- 5.4 As in previous years, economies have focused as far as possible on increasing efficiency, income generation, reducing central and departmental support and transforming rather than reducing front line services.
- 5.5 The draft budget proposals, which reflect the priorities in the Council Plan and included a suggested approach for inflation, are summarised in Table 1.

Table 1: Draft Budget Proposals

Directorate	Commitment Budget (CB )	Capital programme	Inflation	Service Pressures / Economies <sup>1</sup>	Covid-19 Contingency	Specific Grant Assumptions	Earmarked Reserves – 20/21 Collection Fund Deficit	Draft Budget 2022/23
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Central	18,404	0	0	-97	0	0	0	18,307
Delivery	14,780	0	0	30	0	0	0	14,810
People	80,459	0	0	2,155	0	0	0	82,614
Non Departmental / Council Wide	-41,320	67	4,400	292	-3,417	2,104	11,498	-26,376
<b>Total</b>	<b>72,323</b>	<b>67</b>	<b>4,400</b>	<b>2,380</b>	<b>-3,417</b>	<b>2,104</b>	<b>11,498</b>	<b>89,355</b>

<sup>1</sup>Note the differences between the best and worst case pressures will inform the level of general contingency required in the budget to guard against risks rather than being allocated to individual directorates.

## **6 Local Government Finance Settlement**

### **6.1 Overview**

6.1.1 The Provisional Settlement was published on 16 December 2021 and to prioritise certainty for 2022/23 it has been confirmed that the settlement is for one year only. This confirmed that funding in a number of areas would be maintained or increased in 2022/23 and also provided details at council level of additional funding announced as part of SR21. The final settlement has still to be published.

6.1.2 Funding from central government is currently received through a share of Business Rates, Revenue Support Grant (RSG) and Specific Grants. The provisional settlement delivers additional grant of £1.195m compared to the expectation at the time the draft budget proposals were published, although the -£0.244m received from the Market Sustainability and Fair Cost of Care Fund is expected to be cost neutral due to the additional costs that will be incurred (paragraph 6.3.4).

### **6.2 Revenue Support Grant (RSG)**

6.2.1 SR21 did not refer to RSG but the provisional settlement confirmed that it would be increased in line with the September increase in CPI (3%) and that two small grants would be rolled into the total to simplify the funding landscape, namely the Electoral Registration grant and the Financial Transparency of Local Authority Maintained Schools grant. RSG will therefore increase by -£0.057m to -£1.837m which is -£0.029m more than assumed in the draft proposals.

### **6.3 Specific Grants**

6.3.1 SR21 indicated that councils would receive £4.8 billion of new grant funding over the SR21 period (£1.6 billion each year) for social care and other services. This grant would include funding for the Supporting Families Programme and additional funding to tackle cyber security challenges facing councils. However, the provisional settlement has confirmed that the funding for both these areas will now be delivered outside of the Local Government Finance Settlement and further detail will follow in due course. Allocations that were confirmed as part of the provisional settlement are covered below.

6.3.2 The additional funding allocated includes a one-off '2022/23 Services Grant' (£822m in total) which will be unringfenced so that it can be used to support local priorities. The Council's share of this grant is -£1.160m. The Government has stated it intends to work closely with local government on how to best use this funding from 2023/24 onwards.

6.3.3 The government will provide councils with £700 million in new grant specifically for social care. Of the £700 million of additional grant, £636 million is proposed for an increase to the Social Care Grant and the remainder as an inflationary uplift to the improved Better Care Fund. As a result, Social Care Grant has been increased by -£0.839m to -£2.829m for Bracknell Forest with the 3% inflation uplift for the IBCF worth an additional -£0.045m.

6.3.4 The Government outlined in SR21 that social care reform funding would be part of Core Spending Power. The Department for Health and Social Care's Market Sustainability and Fair Cost of Care Fund has therefore been included within Core Spending Power in 2022/23. This £162 million fund is to support Local Authorities prepare their markets for reform and move towards paying providers a fair cost of care. The Council will receive -£0.244m from this fund in 2022/23.

## Unrestricted

Funding in the following two years is expected to be more significant (£600 million each year) but is conditional upon the conclusion of a cost of care exercise, the publication of a provisional 3-year market sustainability plan on how councils intend to move to a sustainable rate fee and a grant spending report. It has been assumed the impact of this grant will be cost neutral on the budget as additional costs will be incurred to meet the grant conditions.

- 6.3.5 Lower Tier Services Grant, an un-ringfenced grant introduced in 2021/22, will be maintained for a further year and will increase by -£0.010m to -£0.199m. This has been provided to councils responsible for services such as homelessness, planning, recycling, refuse collection and leisure services.
- 6.3.6 The provisional settlement confirmed that there would be a new round of New Homes Bonus (NHB) allocations for 2022/23 which would again be for one year only. The existing allocation mechanism has been maintained for a further year and the Council's allocation for 2022/23 will be -£2.294m. Whilst this is £0.583m less than last year it is still £0.817m more than assumed in the draft budget proposals. As the remaining legacy payment (relating to 2019/20) will drop out in 2023/24 and the 2022/23 payment is one-off there is no guarantee that any income will be available to reduce the budget gap in future years. The Government has already consulted on the future of NHB but has yet to respond. It is likely the any reform will now be implemented in 2023/24.
- 6.3.7 The ring-fence on Public Health will be retained in 2022/23, however the settlement included no information about the national total, or individual council allocations.
- 6.3.8 Information on a number of smaller Specific Grants has now been received. Any changes in these grants will be managed within Directorate budgets and will therefore not impact on the overall budget proposals.

## 6.4 Business Rates

- 6.4.1 Another important stream of income for the Council is Business Rates, a proportion of which is retained locally following the introduction of the Business Rates Retention reforms in April 2013. The level of Business Rates changes each year due to inflationary increases (set by central government), the impact of appeals and local growth or decline as local businesses and economic conditions expand or contract. To support businesses in the near-term, the government has decided to freeze the business rates multiplier in 2022/23. This will be cost neutral for the Council as compensation for the loss of income will be provided via a section 31 grant.
- 6.4.2 The Government sets a baseline level of funding against which any growth or reduction is shared between local and central government. It has been confirmed this will also be frozen in line with the increase in the small business non-domestic rating multiplier (-£16.832m).
- 6.4.3 The timing of the introduction of a new Business Rates system is uncertain but it is likely to be in 2023/24. To coincide with this, it is expected that a fair funding review will be used to calculate the new baseline funding levels for individual councils based on an up-to-date assessment of their relative needs and resources. The provisional settlement states that it is the government's intention to work closely with the sector and other stakeholders over the coming months to update the allocation mechanism and to look at the challenges and opportunities facing the sector before consulting on any potential changes. Existing grants including RSG and most likely the Public Health Grant will be incorporated into the revised baseline and more

responsibilities are likely to be transferred to Local Government to ensure that the new system is fiscally neutral overall.

- 6.4.4 Bracknell Forest is in a virtually unique position in terms of its current Business Rates income. The transfer of a large multi-national company on to the Council's valuation list in 2013/14 significantly increased the level of Business Rates collected locally. This transfer represented a significant windfall for the Council, creating both a significant opportunity and risk at the time and has been a key factor in providing resources to balance the Council's budget since then.
- 6.4.5 Around half of the additional income was used to support the base budget with the remainder set aside in an earmarked reserve to mitigate against the risk of the additional income reducing or being withdrawn. This prudent approach meant that the Council was not immediately impacted by a successful appeal by the company against the rateable value, which resulted in it being reduced by 28% in 2016/17. Several other appeals have since been successful resulting in a further 7% reduction in rateable value. There are still appeals outstanding on the 2010 valuation and further multiple appeals were lodged following the 2017 valuation which are still outstanding. The Council has been informed by Government officials that that the company will join the Central Rating List in 2023/24. Due to changes at the company's key site in Bracknell there is also a possibility that we could see the loss of this income sometime in 2022.
- 6.4.6 As the timing and outcome of all these events are uncertain, broad assumptions have had to be made in calculating future income levels. An unavoidable consequence of this has been significant volatility in the Collection Fund balance each year. This continues to represent a considerable risk to the Council's current and future Business Rates income. In 2020/21 a deficit of £11.498m was projected on the Business Rates element of the Collection Fund. This was entirely due to the additional Business Rates reliefs granted by the Government after income estimates were submitted at the beginning of the year. Section 31 grant was provided in 2020/21 to compensate councils for the resultant loss of income and this was subsequently transferred into the Business Rates Reliefs Reserve at the year-end so that it could be used to fund the deficit when it became payable in 2021/22. There is now a significant deficit projected on the Business Rates element of the Collection Fund for 2021/22 (£2.428m), primarily for the same reason as last year, with section 31 grant again being received as compensation.
- 6.4.7 In addition to these specific issues, the move to the new funding system will be accompanied by a re-set of the current business rates arrangements. This will most likely mean that all or a large part of the additional business rates that the Council has secured through the company referred to above and from the town centre opening in 2017 will no longer directly benefit Bracknell Forest.
- 6.4.8 Section 31 grant is receivable in relation to Business Rates. This is designed to cover the loss of income resulting from the capping or freezing of Business Rates increases in previous years and the freezing of Business Rates increases in 2022/23 plus the impact of several Business Rate Reliefs. Section 31 income is estimated to be -£6.621m in 2022/23 (-£2.142m in 2021/22), an increase of -£4.479m. Unlike with 2021/22, reliefs have been granted at an early stage by the Government and have therefore been reflected in the budget. This should reduce the likelihood of a deficit at the end of 2022/23.
- 6.4.9 The 2021/22 budget included an additional transfer of -£12.035m from reserves, most significantly the transfer of -£11.498m from the Business Rates Reliefs

## Unrestricted

Reserve to meet the 2020/21 deficit on the Business Rates element of the Collection Fund. The basic approach taken to business rates remains unchanged in 2022/23 and based on the revised projections, an additional £0.586m will be transferred to reserves (£3.014m to the Transformation, Future Funding and Town Centre reserves, partly offset by a drawdown of -£2.498m from the Business Rates Reliefs Reserve for the 2020/21 deficit on the Business Rates element of the Collection Fund).

### 6.5 Medium Term Financial Situation

6.5.1 There is significant uncertainty for the period from 2023/24 due to the potential impact of a number of issues, in particular:

- Fair Funding Review
- Business Rates system re-set
- The 2021/22 settlement is for one year only
- Continuing impact of Brexit and the pandemic

6.5.2 This hampers meaningful financial planning at a time when there is uncertainty around government funding and demand pressures are increasing significantly. Given the relative prosperity of Bracknell Forest and the Government's aim to "level up" across the regions, it is unlikely that the impact of these changes will increase our local resources overall.

6.5.3 The most likely consequence of all of these factors combining is an additional recurring budget gap of around £4.0m in 2023/24, due to funding changes alone. The Future Funding Reserve has deliberately been created and supplemented through the additional income from Business Rate Pilot status in order to help manage the transition to the new funding arrangements. It is estimated that there will be a balance of approximately £18.4m available on the Future Funding Reserve at the end of 2021/22 and 2022/23, which allows the Council to take a measured approach over time to bridging the gap.

6.5.4 The impact of these factors will be a greater reliance on Council Tax income as an on-going source of funding to support essential front-line services. The current level of Council Tax in Bracknell Forest is still one of the lowest of any Unitary Authority in England. While a high level of increase in any year is unlikely to be universally welcomed by residents, for many years the Council's financial plans have assumed the maximum level of increase permitted is applied. This is in line with Government assumptions and provides the greatest level of protection possible for essential services in the period from 2023/24.

## 7 Council Tax and Collection Fund

7.1 The Council Tax Base for 2022/23 has been calculated as 48,249 Band D equivalents which at current levels would generate total income of -£67.702m in 2022/23.

7.2 The Government limits Council Tax increases by requiring councils to hold a local referendum for any increases equal to or in excess of a threshold percentage which is normally included in the Local Government Financial Settlement. The Government has set a core referendum limit of 2% plus the option for councils with responsibility for adult social care, such as Bracknell Forest, to set an adult social care precept of up to a further 1%. In 2021/22 the Council was given the option of setting an additional adult social care precept of up to 3% which could be raised in 2021/22 or spread across two financial years. 1.5% was raised in 2021/22 leaving the option to raise a further 1.5% in

2022/23, which would be in addition to the 2%+1% referred to above. Every 1% increase in Council Tax in Bracknell Forest would generate -£0.677m of additional income.

- 7.3 A surplus will be generated on the Council Tax element of the Collection Fund in the current year, primarily due to a higher level of growth in new properties than expected. The Council's share of this one-off surplus is -£0.354m. This will be used to support the 2022/23 budget.

## **8 Developments since the Executive Meeting on 14 December 2021**

### **8.1 Consultation**

- 8.1.1 The Executive's draft budget proposals have been subject to a process of public consultation since their publication in December. During the consultation period, the draft proposals have also been scrutinised by the Council's Overview & Scrutiny Commission. Several points were considered and clarified but no changes were proposed. An extract from the minutes of the meeting is attached as Annexe B.

- 8.1.2 The Schools' Forum considered the Executive's proposals relating to the schools' element of the People's Directorate at its meeting on 13 January. Continuing concern was expressed regarding the projected High Needs Block cumulative deficit of circa £20m as at the end of 2022/23 and the Council's ability to manage any potential payback from April 2023. This has been acknowledged as a key issue for the Council and a high-level action plan has been developed that is expected to reduce the scale of the deficit over time. The expected financial impact of this in each of the coming years is currently being assessed.

- 8.1.3 The draft budget proposals were published on the Council's web site and emails were sent to business ratepayer representative groups drawing their attention to the consultation. Eighty-six responses were received to the public consultation via the web site (set out in Annexes C1 and C2, with names redacted) plus a separate detailed response from the Council's Labour Group (repeated in full in Annex C4). No responses were received from business ratepayers. Two key themes emerged through the consultation process;

#### **a) Concerns raised by licensed taxi drivers**

A template response was submitted by 60 drivers, raising concerns about specific license fee charges. Detailed consideration has been given to the issues raised by the drivers in a full response set out in Annex C3. It is believed that, overall, the proposed fees and charges for 2022/23 will be favourable to the taxi trade as they include on-line arrangements that will reduce costs. However, the level of the proposed charge for Disclosure and Barring Service (DBS) checks has been reviewed and will be reduced from the proposed £94 to £79. A Government service to update DBS checks on-line is now available at a cost of £13, which will be promoted and discussed with driver representatives. Drivers and operators each received significant grant support from the Council during 2021, recognising that they continued to face fixed costs while suffering from reduced income levels. It is therefore proposed to retain all the other fees at the levels included in the draft budget proposals.

#### **b) Concerns raised about reduced staffed opening hours in libraries while expanding access through the Open+ technology**

In total 13 different responses were received opposing this proposal, highlighting

the perceived importance of access to staff for the core library service and social interaction. In response, it has been explored how the level of saving identified could be achieved in a different way. A revised proposal has been developed to achieve the draft budget saving by reducing the stock fund budget by £20,000, recognising libraries are currently struggling to display all current stock, and deleting vacant posts to save £64,000. This proposed amendment to the initial proposal, prompted by the budget consultation responses, will enable the identified saving to be achieved while retaining the current level of staff opening hours.

8.1.4 The other consultation responses contained a broad range of comments which have been considered in presenting the final budget proposals.

8.2 Inflation

8.2.1 The Executive established a framework for calculating an appropriate inflation provision at its December meeting. Inflation allowances have now been finalised within this framework and total £4.368m, £0.032m less than the figure included in the draft budget proposals. The directorate analysis is shown in Table 2.

Table 2: Inflation Allocations

<b>Directorate</b>	<b>2022/23 £'000</b>
Central	786
Delivery	1,131
People (excluding schools)	2,445
Non Departmental / Council Wide	6
<b>Total</b>	<b>4,368</b>

8.2.2 Inflation on schools' expenditure is provided for within the Dedicated Schools Budget expenditure, which is funded mainly by the Dedicated Schools Grant, with an additional top up from the Council (section 9.1).

8.3 Other Revisions to the Draft Budget Proposals

8.3.1 As outlined above, in the two months since the Executive published the draft budget proposals more information has inevitably become available. The suggested amendments to the draft budget proposals are set out in paragraphs a) to j) below, with the net impact being an increase in the net revenue budget for 2022/23 (£2.482m). These changes have been reflected in the full budget proposals set out in Annexe D, the Commitment Budget (Annexe A) and the Contingency (section 10.6).

a) Council Tax Bills - Central – Resources (Revenues)

The issue of rising costs of living, particularly impacting on low income households, has been the subject of significant press coverage in recent months. The Council, assisted by a range of Government grants, has introduced a broad range of support measures during the Covid pandemic aimed at assisting households on low incomes and at risk of suffering financial hardship. This has included offering reductions in Council Tax bills for households in receipt of council tax support of £150 in both 2020/21 and 2021/22, funded by specific Government grants. With those grants having

been withdrawn for 2022/23, it is not sustainable for the Council to continue to provide on-going financial support of this nature from its own resources. However, one-off funding is available that enables a reduced level of discount to be made available in 2022/23 and, subject to overall affordability, potentially in future years.

Annex H sets out in detail a proposed reduction of £100 in Council Tax bills that will benefit around 3,000 households paying council tax on the lowest incomes in 2022/23 as well as a wide range of support that is available for households experiencing or at risk of experiencing financial hardship. This will be funded from Covid-19 grant previously transferred into Earmarked Reserves (+£0.320m) and is recommended to the Executive.

- b) Central – Resources (Finance)  
An academy conversion will result in lost income for the Finance service (+0.004m).
- c) Central – PPR (Regeneration and Economic Development)  
Her Majesty the Queen celebrates her Platinum Jubilee in 2022. It is proposed to commemorate this with a programme of events across the Borough, with a key focus on the Lexicon which Her Majesty visited in October 2018 (+£0.055m). This expenditure will be one-off, funded from the High Street Innovation Fund earmarked reserve.
- d) Delivery – Borough Greening  
Additional capital and revenue funding will support the Council's work on 'greening the Borough' through deep cleaning, changes to vegetation, the removal of dead plants, plus the planting of new, hardier plant stock in line with the Council's climate change strategy (+£0.025m revenue). This sum complements funding proposed as an additional capital funding allocation in the separate report on the agenda dealing with the Capital Programme for 2022/23.
- e) Delivery – On / Off Street Parking  
The additional saving from the renegotiation of the contract for managing the borough car parks was double counted in the draft proposals, with the same issue also being included in the Commitment Budget. It has therefore been removed from identified departmental savings but remains in the budget proposals for 2022/23 (+£0.056m).
- f) People – Social Care Costs  
Due to changes in the number and cost of placements since the December report, Social Care pressures have been updated as normal to reflect the impact in 2022/23 of existing placements (Children's +£0.799m) and Adults (-£0.128m).
- g) People – Special Educational Needs and Disabilities (SEND) Team Restructure  
Since March 2021 the SEND Team establishment has been under review and subject to a restructure project. A demand modelling review has taken place to ensure the new structure meets the service demands and needs of the next 3-5 years (+£0.180m), including responding to the recent Ofsted inspection.
- h) All Directorates – DSB managed vacancy adjustment  
A reduction of the managed vacancy factor for staffing budgets to 1% plus an allocation for additional pressures has now been incorporated into directorate



budgets (+£1.046m) to address capacity challenges that have been exacerbated over the Covid period.

- i) Non-departmental / Council Wide – earmarked reserves  
Transfers from Earmarked Reserves to fund the £100 reduction in Council tax bills for households in receipt of Council Tax support (-£0.320m) and the Queen's Platinum Jubilee celebrations (-£0.055m).
  
- j) Non-departmental / Council Wide – agency savings  
Targeted work is being undertaken in this area to reduce the risk of overspends on staffing budgets caused by the employment of more expensive agency workers to cover essential, vacant posts. Detailed analysis has shown that this work will not enable current budgets to be reduced and therefore the projected savings included in the draft budget proposals are now seen as “cost avoidance”, meaning that the previously identified saving has been removed. The reduced level of risk of overspends on staffing budgets will be used to inform deliberations on the appropriate level of General Contingency to be set aside in the final budget proposals (+£0.500m).

8.3.2 The Executive is asked to support the changes above and confirm that there are no further changes to the draft budget proposals that they wish to make following representations made during the consultation period.

## **9 Other Budget Issues**

### **9.1 Schools Budget**

- 9.1.1 Whilst spending on the Schools Budget is generally funded by the ring-fenced Dedicated Schools Grant (DSG) and therefore outside of the Council's funding responsibilities, councils retain a legal duty to set the overall level of the Schools Budget. In deciding the relevant amount, councils must plan to spend at least to the level of estimated DSG.
  
- 9.1.2 The DSG comprises 4 funding Blocks, each with a separate calculation of funding and intended purpose; the Schools Block (SB); the Central School Services Block (CSSB); the High Needs Block (HNB); and the Early Years Block (EYB). The SB and CSSB directly support mainstream schools and are generally delegated to governors. The HNB and EYB are centrally managed by councils with most of the funding ultimately being paid directly to providers, including schools. The HNB supports pupils whose educational needs are above £10,000 with the EYB mainly funding the cost of the free entitlement to childcare and early years education for 2, 3 and 4 year olds.
  
- 9.1.3 To date, under powers delegated through the December budget report, the Leader has agreed a budget for the SB of £84.435m, a CSSB of £0.866m and an EYB of £7.981m. These amounts represent the estimated level of DSG funding, with the detailed budget decisions matching those previously approved by the Schools Forum. The HNB will be considered by the Executive Member for Children, Young People in March with the estimated -£21.847m DSG being the primary source of income. Therefore, at this stage, total DSG income for 2022/23 is estimated at -£115.129m.
  
- 9.1.4 Within the DSG allocation, most elements of funding for special educational needs and disability (SEND) pupils will increase by 11.5% (£2.412m) next year. Whilst a substantial increase, this would still be insufficient to fund the forecast costs which

indicate a £7.500m overspend for the year which arises from significant increases in both the numbers of pupils requiring support and the complexity of need. This is a national issue with the council working closely with the Schools Forum on a change programme.

- 9.1.5 This deficit will be balanced in the Council's budget by a charge to the DSG Adjustment Account as it will need to be met from the DSG over the medium term. A contribution from the DSG Adjustment Account of £4.943m is already reflected in the base budget. A further contribution of £2.557m will therefore be required which has been reflected in the Commitment Budget. Officers are meeting regularly with stakeholders to identify further options for change in service delivery and reduction in costs through the governance of the Schools Forum.
- 9.1.6 In light of the significant financial pressures that councils are experiencing on the High Needs (HN) budgets (those intended to support pupils with SEND) the DfE introduced new rules to make clear that any accrued deficit is not a liability on councils but remains a DfE responsibility. Additionally, the DfE has also introduced a more rigorous monitoring and intervention regime where council areas have deficit balances or experience a significant reduction in a surplus.
- 9.1.7 In respect of DfE liability to underwrite accumulated debt on HN budgets, recent communications have suggested that this is a 3-year time limited period to enable councils to move towards a position of containing annual expenditure within annual income and that councils should be planning to manage any accumulated debt at April 2023 from their own resources. It is understood that discussions are continuing between Government Departments on the timing of this change. Without any interventions, the forecast balance for HN budgets is a cumulative deficit of £20m. This is clearly not an affordable position for a small unitary authority like Bracknell Forest and it is essential that emerging plans to address the deficit are agreed quickly and enacted by the Council and schools.
- 9.1.8 In terms of general school budgets, the policy of the Council for many years has been to fund up to the level of relevant annual DSG Block grant income plus any accumulated surplus balances held in the retained Schools Budget. Following a request from the Schools' Forum, the Executive agreed to contribute £1m from council reserves over the four years to March 2023, specifically to support the additional costs arising from new schools. In recommending the budget requirement next year for schools, as well as utilising the DSG, the final £0.182m of additional funding remaining from the Council's reserves will be utilised. This is a reduction of £0.045m compared to the £0.227m required in 2021/22 and included in the Base Budget. The reduction is included in the Commitment Budget but is cost neutral as it is balanced by a transfer from the reserve which is reflected within Council Wide budgets.
- 9.1.9 Setting the overall level of the Schools Budget and the operation of the funding formula that distributes the money to schools is a statutory council function. Agreeing how much is centrally managed is a decision for the Schools Forum. To meet these deadlines, council statutory decisions around the Schools Budget are delegated by the Full Executive to the Executive Member for Children, Young People and Learning. Recommendation 2.4 sets the parameters for the formal decision to be made. The Executive Member also endorses the decisions of the Schools Forum when these are undertaken in its statutory decision making role.

9.2 Pensions

9.2.1 Accounting standards on the treatment of pension costs (IAS19) require the inclusion within the total cost of services of a charge that represents the economic benefits of pensions accrued by employees. To simplify the presentation of the budget proposals the IAS19 adjustment has not been incorporated at this stage, although it will be included in the supporting information to the Council meeting on 23 February. This will not impact upon the Council's net overall budget or the level of Council Tax.

9.3 Investments

9.3.1 Now that the Council is in no longer debt-free and has made use of external borrowing to part fund its capital investments in recent years, returns on surplus cash are likely to remain relatively low during 2022/23 and beyond. As such the impact of interest rates on borrowing rates are of greater significance to the Council.

9.3.2 The coronavirus outbreak has done huge economic damage to the UK and to economies around the world. After the Bank of England took emergency action in March 2020 to cut the Bank Rate to 0.10%, it left the Rate unchanged at its subsequent meetings until raising it to 0.25% at its meeting on 16th December 2021. Economies continue to re-open, while governments have either commenced or are contemplating dialling down emergency fiscal support mechanisms.

9.3.3 For the UK, fiscal policy tightening has already been put in place. On the monetary policy front, matters are more complex, with price pressures on the rise and expected to remain elevated into 2022/23, while economic recoveries are seemingly losing momentum heading into the latter stages of 2021/22. Markets are unsettled, with asset prices coming under pressure following their largest gains made in the formative stages of recovery. The forecast for the Bank Rate now includes four increases, one in quarter 2 of 2022 to 0.50%, quarter 1 of 2023 to 0.75%, quarter 1 of 2024 to 1.00% and, finally, one in quarter 1 of 2025 to 1.25%.

9.3.4 Vaccines were the game changer during 2021 which raised high hopes that life in the UK would be able to largely return to normal in the second half of the year. However, the Omicron mutation at the end of November changed the landscape again. Rather than go for full lockdowns which heavily damage the economy, the government strategy this time is focusing on getting as many people as possible to have a third (booster) vaccination after three months from the previous last injection, as a booster has been shown to restore a high percentage of immunity to Omicron to those who have had two vaccinations.

9.3.5 With the household saving rate having been exceptionally high since the first lockdown in March 2020, there is plenty of pent-up demand and purchasing power stored up for services in sectors like restaurants, travel, tourism and hotels which had been hit hard during 2021 but now looks likely to be hit hard again by either, or both, of government restrictions and/or consumer reluctance to leave home. The economy, therefore, faces significant headwinds although some sectors have learned how to cope well with Covid.

9.3.6 The 2022/23 Treasury Management Report attached as Annexe E re-affirms the strategy adopted by the Executive in December 2016 that governs the amount, duration and credit worthiness of institutions that the authority will place investments with during 2022/23. As such the Council will only place deposits with the most highly rated UK Banks and Building Societies, alongside the part-nationalised UK Banks, up to a limit of £7m and for a maximum period of 364 days (for part-

nationalised UK Banks). Additionally, the Council will be able to invest up to £10m with AAA Money Market Funds and other UK Local Authorities and an unlimited amount through the Government Debt Office Management Deposit Facility. The Annual Investment Strategy is shown in part (iv) of Annex E. Following the review by the Governance and Audit Committee on the 26 January 2022, the Treasury Management Strategy remains unchanged from that consulted on in December.

- 9.3.7 The Local Government Act 2003 introduced a revised framework for capital expenditure and financing, underpinned by CIPFA's Prudential Code for Capital Finance in Local Authorities. The Code requires the Council to set a number of prudential indicators and limits relating to affordability, capital investment and treasury management. They are included at Annex E (i) and within the Treasury Management Strategy Statement at Annex E (iii).
- 9.3.8 The capital programme is being considered separately on tonight's agenda and proposes Council funded capital expenditure of £9.274m and an externally funded programme (including self-funding schemes) of £7.037m for 2022/23. After allowing for projected receipts of approximately £3.5m (including CIL) in 2022/23 and carry forwards, the additional revenue costs will be £0.067m in 2022/23 and £0.341m in 2023/24. These figures have now been reflected in the Commitment Budget and the impact on 2022/23 is unchanged from the draft proposals. Costs will need to be revised at the meeting if the Executive decides on a different level of capital spending.
- 9.3.9 The Council is required to pay off an element of the accumulated General Fund capital spend each year through a revenue charge (the Minimum Revenue Provision or MRP), although it is also allowed to undertake additional voluntary payments. The regulations issued by the Ministry of Housing, Communities and Local Government's (MHCLG) require full Council to approve an MRP Policy in advance of each year. The Council is therefore recommended to approve the MRP Policy set out in Annex E (ii) to the Treasury Management Strategy. The MRP policy has been drawn up to ensure the Council makes prudent provision for the repayment of borrowings (in accordance with the Regulations) and at the same time minimises the impact on the Council's revenue budget. The Government is currently consulting on proposed changes to MRP guidance, the result of which may require changes to the Council's MRP policy in future years, although the extent of such changes is not currently known.
- 9.3.10 As capital expenditure is incurred which cannot be immediately financed through capital receipts or grant, the Council's borrowing need (its Capital Financing Requirement) and its MRP will increase. The Council also needs to make a charge to revenue for "internal borrowing".
- 9.3.11 The draft budget proposals included an estimate of £1.718m for the Minimum Revenue Provision required to be made in 2022/23 and £0.524m for a Voluntary Revenue Provision relating to commercial property purchases. These figures have been reviewed based on the latest capital projections and remain unchanged. The actual charge made in 2022/23 will be based on applying the approved MRP policy to the 2020/21 actual capital expenditure and funding decisions.
- 9.4 Capital Charges
- 9.4.1 Capital charges are made to service directorates in respect of the assets used in providing services and are equivalent to a charge for depreciation. The depreciation charges are included in the base budget figures and are important as they represent

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the opportunity cost to the Council of owning non-current assets. They must therefore be considered as part of the overall cost of service delivery, particularly when comparisons are made with other organisations. It is also important that these costs should be recognised when setting the level of fees and charges.

- 9.4.2 Capital charges do, however, represent accounting entries and not cash expenditure. The Council is therefore able to reverse the impact of these charges “below the line”, i.e. outside service directorate costs, thereby reducing the net revenue budget whilst not directly affecting the overall cost of each individual service. This means that the charges do not affect the level of Council Tax. The capital charges in 2022/23 total £15.796m which is an increase of £0.494m compared to the current year and results from new additions and revaluations. There will be no impact on the charge to the General Fund which is based on the MRP not depreciation.
- 9.4.3 Changes to capital charges do affect internal services recharges (see below). Changes to these have not been incorporated into the budget proposals in this report at this stage, although they will be included in the supporting information to the Council meeting on 23 February.
- 9.5 Internal Services Recharges
- 9.5.1 Members’ decisions on the capital programme may affect capital charges and this will determine the overall cost of services in 2022/23. Due to their corporate nature, some services do not relate to a single service directorate, e.g. finance, IT, building surveyors, health and safety advisers etc. The budgets for these services are changed only by the specific proposals impacting on the directorates responsible for providing them (Central & Delivery). However, all such costs must be charged to the services that receive support from them.
- 9.5.2 The impact of changes in recharges for internal services is entirely neutral across the Council as a whole, since the associated budgets are also transferred to the services receiving them. The overall level of recharges is dependent upon the Executive’s budget proposals being approved.

## 10 Statement by the Executive Director: Resources

- 10.1 Under the Local Government Act 2003, the Executive Director: Resources (as the Council’s Section 151 Officer) must report to Members each year at the time they are considering the budget and Council Tax on:
- a) The robustness of estimates; and
  - b) The adequacy of reserves.

In addition, CIPFA guidance on Local Authority Reserves and Balances states that a statement reporting on the annual review of earmarked reserves should be made to Council at the same time as the budget. The statement should list the various earmarked reserves, the purpose for which they are held and provide advice on the appropriate level.

Robustness of estimates

- 10.2 The annual statement on the robustness of the estimates formalises the detailed risk assessments that are undertaken throughout the year and which are a standard part of the budget preparations and are included in the Council’s Strategic Risk Register.

This identifies a number of key risk areas including:

- significant pressures on the Council's ability to balance its finances whilst maintaining satisfactory service standards;
- the impact of the coronavirus on internal staff resources and external suppliers, and the council's ability to deliver essential services and meet the increasing needs of the community;
- the impact of the high use of long term locums and agency workers for key posts and labour market pressures on finances and business resilience;
- ensuring children with special education needs receive timely and appropriate support for their education where demand is increasing, and internal resources are limited;
- the impact of demand led services and the need to plan for and respond to future and in-year demographic changes, changes in the market for services and any associated financial pressures;
- sustaining adult social care services where there is insufficient external provision available;
- effective safeguarding of children and vulnerable adults when there are external factors outside the Council's control;
- delivery of an IT Strategy and digital infrastructure that meets business needs, compliance, information accuracy, data protection, greater reliance on end users and the threat of cyber-attacks;
- maintaining adequate Business Continuity plans and procedures;
- maintaining an adequate internal control environment.

10.3 The budget includes resources sufficient to enable the Council to monitor these key risks and where possible to minimise their effects on services in accordance with the strategic risk action plans. Specific risk reduction measures that are in place include the following:

- Budget Setting Process
  - Production and regular monitoring of a robust medium-term financial strategy.
  - Regular analysis of budgets to identify legislative, demographic, essential and desirable service pressures / enhancements.
  - Detailed consideration of budgets by officers and Members to identify potential budget proposals.
  - Robust scrutiny of budget proposals prior to final agreement.
  - Ensuring adequacy and appropriateness of earmarked reserves, both for the immediately following and future years.
- Budget Monitoring
  - Robust system of budgetary control with regular reporting to the Corporate Management Team (CMT) and through the Quarterly Service Reports (QSRs).
  - Exception reports to the Executive.
  - Regular review of the Councils' budget monitoring arrangements by both internal and external audit to ensure they remain fit for purpose.
  - Taking corrective action where necessary during the year to ensure the budget is delivered.
  - Specific regular review by Finance Business Partners of particularly volatile budget areas.

10.4 The Executive Director: Resources receives regular updates from Business Partners on

the largest and most volatile budget areas which could place the overall budget most at risk and makes arrangements to report these through the regular monthly budget monitoring process. The most significant risks in the 2022/23 budget have been identified as the following:

- **Covid-19 Pandemic** – uncertainty surrounding the length and overall impact of the continuing pandemic on costs and income;
- **Demographics** – the number of “demand” led adult and child client placements, the rising cost and numbers of looked after children, increasing support pressures resulting from people living longer, the impact of new housing developments and changing service provision of social care encouraging people to seek support;
- **Income** - specifically in Leisure, Planning and Building Control Fees, Car Parks, Commercial Property, Land Charges and Continuing Health Care funding. Significant income streams are reliant on customer demand and physical infrastructure remaining operational, placing a heavy reliance on planned and reactive maintenance being adequate;
- **Major schemes / initiatives** – progress with the Town Centre redevelopment, Waste Management PFI and the implementation of savings proposals;
- **Inflation** – the provision is based on estimates of inflationary pressures at the current time;
- **Treasury Management** – return on investments and additional borrowing are affected by cash flow and the level of the Bank rate.
- **Uninsured losses** – the Council’s insurances cover foreseeable risks. However, some risks are uninsurable, including former County Council self-insured liabilities and mandatory excesses;
- **Contractual Issues** – disputes, contract inflation (in particular rates for care providers which are increasing due to rising demand and reducing supply) and renewal of major contracts;
- **Legislative Changes** – difficulty in identifying the financial and non-financial impacts and whether any future burdens will be fully funded;
- **Independent external providers** – changes in provision by independent service providers may result in increased costs to the Council;
- **Service interdependencies** – the potential impact of service reductions in one area on the demand for other services provided by the Council;
- **External inspections** – improvements identified through external inspection;
- **Safeguarding** – failure to adequately safeguard vulnerable people could result in cost pressures.

10.5 The probability of some of the above risks occurring is high. However, it is unlikely that all will occur at the same time. The measures in place, set out in paragraph 10.2, lead the Executive Director: Resources and CMT to conclude that the budget proposals have been developed in a sound framework and are therefore robust. However, it needs to be recognised that not all adverse financial issues can be foreseen looking almost fifteen months ahead, e.g. the impact of changes in demand led services or severe weather conditions. It is therefore prudent to include, as in previous years, contingency sums within the budget proposals.

#### Contingencies

10.6 In setting the budget for 2021/22, the level of General Contingency was maintained at £2.250m and a Covid-19 specific contingency (£3.417m) created to cater for the difference between best and worst-case scenarios for pressures. Rather than build worst case scenarios into the base budget the additional contingency was available to meet these additional pressures if they arose during the year. Within the draft budget

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proposals for 2022/23 the General Contingency remained unchanged, and the Covid-19 specific Contingency was removed. Although best and worst-case scenarios have again been considered for 2022/23, it was felt that all risks could be handled by way of the General Contingency as the impact of the pandemic has reduced, although it was recognised that this approach would need to be reviewed.

- 10.7 The Executive Director: Resources, Chief Executive and CMT have reflected upon the outlook for the economy, the impact of demographic changes and the resulting pressures on services and other risks contained within the proposed budget. Considering significant risks, including the worst case pressures (£1.619m) partly offset by potential savings from managing agency costs more proactively, a decrease of £0.350m in the General Contingency to £1.900m is now felt to be appropriate.

### Earmarked Reserves

- 10.8 Earmarked Reserves are sums of money which have been set aside for specific purposes. These are excluded from general balances available to support revenue or capital expenditure. The Council had £84.209m in Earmarked Reserves at the start of 2021/22 which were approved by the Governance and Audit Committee in July 2021. The Executive Director: Resources has undertaken a review of existing earmarked reserves and Annexe F sets out each reserve considered. The Executive Director: Resources will review again the earmarked reserves considering the changing risks facing the Council as part of the 2021/22 closedown process and any changes will be presented to the Executive and the Governance and Audit Committee as part of the closure of the accounts.

## 11 Net Revenue Budget

- 11.1 Tables 3a and 3b summarise the budget changes for each directorate, assuming that all items outlined above and detailed in Annexes A to F are agreed, but before changes to capital charges, pension costs and internal services recharges are incorporated within service directorate budgets.

Table 3a: Summary of budget changes

	Inflation (Section 8.2)	Revisions to draft budget proposals (Sections 6.2, 6.4, 7.3, 8.3 and 10.6)	Changes to Specific Grants (Section 6.3)	Total Changes Identified
	£'000	£'000	£'000	£'000
Central	786	932	0	1,718
Delivery	1,131	554	0	1,685
People (excluding schools)	2,445	4,640	-884	6,201
Non Departmental / Council Wide	-4,394	-6,423	-37	-10,854
<b>TOTAL</b>	<b>-32</b>	<b>-297</b>	<b>-921</b>	<b>-1,250</b>



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**Table 3b: Non Departmental / Council Wide – revisions to draft proposals included in Table 3a**

<b>Non Departmental / Council Wide</b>	<b>Revisions to draft budget proposals</b>
	<b>£'000</b>
Grant adjustments (paragraph 6.3)	
New Homes Bonus	-817
Lower Tier Services Grant	-10
Services Grant	-1,160
Less grant assumed in December report	1,950
Savings and pressures allocated to Directorates from Council Wide	
DSB managed vacancy factor	-1,222
Contract savings	50
Digital Infrastructure Group	-40
Council Tax Support funded from Covid-19 Reserve (paragraph 8.3)	-320
Queen's Platinum Jubilee celebration funded from High Street Innovations Reserve (paragraph 8.3)	-55
Agency savings removed and reflected in Contingency calculation	500
Change in Contingency	-350
Changes in Business Rates Growth, S31 income projections and levy payment (6.4.6 and 6.4.9)	-3,015
Additional movements in earmarked reserves (paragraph 6.4.9)	586
DSG Adjustment Account (9.1.5)	-2,557
<b>TOTAL</b>	<b>-6,423</b>

11.2 These figures are added to the draft proposals to produce a final budget proposal for each directorate. This is summarised in Table 4.

**Table 4: Draft Budget Proposal 2022/23**

<b>Department</b>	<b>2022/23 Draft Proposals (Table 1)</b>	<b>Changes Identified (Table 3a)</b>	<b>Revised Budget Proposals</b>
	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>
Central	18,307	1,718	20,025
Delivery	14,810	1,685	16,495
People (excluding schools)	82,614	6,201	88,815
Non Departmental / Council Wide	-26,376	-10,854	-37,230
<b>Total</b>	<b>89,355</b>	<b>-1,250</b>	<b>88,105</b>

11.3 The Net Revenue Budget in 2022/23 if the Executive agreed all proposals would be £88.105m before allowing for additional interest resulting from any use of balances. This compares with income of -£84.297m from Revenue Support Grant (-£1.837m), Business Rates baseline funding (-£16.832m), Council Tax at 2021/22 levels (-£67.702m), Collection Fund – Business Rates deficit (£2.428m) and the Collection Fund – Council

Tax surplus (-£0.354m). The Net Revenue Budget is therefore now £3.808m above the level of income for 2022/23.

## 12 Funding the Budget Proposals

12.1 Members can choose to adopt any or all of the following approaches in order to bridge the remaining gap:

- an increase in Council Tax;
- an appropriate contribution from the Council's revenue reserves, bearing in mind the Medium Term financial position;
- identifying further expenditure reductions.

12.2 Council Tax Increase

12.2.1 Each 1% increase in Council Tax in 2022/23 will generate approximately -£0.677m of additional revenue towards the budget gap. The maximum amount the Council is permitted to increase Council Tax by is 4.49%.

12.2.2 This report proposes in recommendation 2.2 to reduce the financial burden for working age households receiving council tax support by making available a council tax discount of £100, following on from discounts of £150 in both 2020/21 and 2021/22 (Annexe H and section 8.3.1(a)).

12.3 Use of Balances

12.3.1 The Council needs to maintain reserves to aid cash flow and to protect itself from fluctuations in actual expenditure and income. An allowance for cash flow is reasonably easy to calculate. However, an allowance for variations against planned expenditure is more difficult.

12.3.2 In deciding the level of any contribution from balances, the Executive will wish to have regard to the level of balances available. The Council's General Fund balance will be £10.3m as of 31 March 2022, if spending in the current year remains within the approved budget, which is the expected position.

Table 5: General Balances as at 31 March 2022

General Fund as at 01 April 2021	£m 10.3
Planned use in 2021/22	(0.0)
TOTAL Estimated General Balances	<u>10.3</u>

12.3.3 The Council has for many years planned on maintaining a minimum prudential balance currently assessed to be £4.5m, which indicates that a sum of up to £5.8m is potentially available for use. However, given that these resources are one-off, it is important when considering the use of reserves to not only consider the current year's budget but also future years' pressures.

12.3.4 The Council will also have an estimated £18.4m in the Future Funding Reserve as at 31 March 2022, which has been deliberately established to help manage the expected additional budget gap of around £4.0m per year from 2023/24, due to national funding changes.

### **13 Preceptors' Requirements**

- 13.1 The Thames Valley Police and Crime Panel met on the 28 January 2022 to determine the 2022/23 budget for the Thames Valley Police and Crime Commissioner (TVPCC). The proposed increase of £10 (4.32%) for a Band D property, from £231.28 to £241.28, was approved. The Royal Berkshire Fire Authority (RBFA) will not determine its budget and precept for 2022/23 until 15 February. The tax for a Band D property for RBFA in 2021/22 was £68.95. The Parish and Town Councils have yet to set their precepts for 2022/23. These totalled £3.721m in 2021/22 with an average tax of £78.16 for a Band D property. All precepts will be reported to the Council meeting on 23 February 2022.

### **14 Summary of Matters for Decision**

- 14.1 Annexe G outlines the Council's Council Tax Requirement based on the draft budget proposals. The outcome of the Executive's deliberations will be recommended to the Council meeting on 23 February regarding the budget and Council Tax level for 2022/23. These will be incorporated in the formal Council Tax resolution required by the Local Government Finance Act 1992 as amended. However, the following matters need to be determined at this stage in order to allow the Executive to recommend a budget to the Council for 2022/23:

- a) confirmation of the draft budget proposals, taking account of issues raised during the consultation period and revisions identified to reflect current information (sections 6.2, 6.3, 6.4, 7.3, 8.2, 8.3, 9.1 and 11.2), set out in detail in Annexes A, D and G;
- b) confirmation of the impact of changes in investments and investment rates on the budget (section 9.3);
- c) the level of the corporate contingency (section 10.7);
- d) the level of Council Tax increase (section 12.2);
- e) subject to (a) to (d) above and decisions considered elsewhere on the agenda, to determine the appropriate level of revenue reserves to be retained and the consequent use of balances to support the budget in 2022/23 (section 12.3).

- 14.2 As outlined above, dependent upon the decisions made by the Executive concerning these issues, it may be necessary to adjourn the meeting to enable officers to calculate the appropriate figures to include in the recommendations.

- 14.3 A detailed budget book will be prepared during March exemplifying the budget at the level of detail required to support the scheme of virement.

### **15 ADVICE RECEIVED FROM STATUTORY AND OTHER OFFICERS**

#### Borough Solicitor

- 15.1 In carrying out all of its functions, including the setting of the budget, the Council must comply with the Public Sector Equality Duty set out in the Equality Act 2010. That duty requires the Council to have due regard to the need to:-

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by the Act;

- b) advance equality of opportunity between persons who share a "relevant protected characteristic" and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

"Relevant protected characteristics" are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation. As to (b) above due regard has to be had in particular to the need to:-

- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

The Equality Impact Assessments annexed to this report have been prepared in order to assist the Council to meet the Equality Duty in considering the budget.

#### Executive Director: Resources

- 15.2 The financial implications of this report are included in the supporting information.

#### Equalities Impact Assessment

- 15.3 The Council's budget proposals impact on a wide range of services. A detailed consultation was undertaken on the draft budget proposals published in December to provide individuals and groups the opportunity to provide comments.
- 15.4 Equality impact assessments are attached at Annexe I.

#### Strategic Risk Management Issues

- 15.5 The Director: Resources' Statement in Section 10 sets out the key risks facing the Council's budget and the arrangements in place to manage these risks, including maintaining an appropriate level of reserves and contingency.

#### Climate Change Implications

- 15.6 There are no implications arising from the proposals in this report, which are recommending budget proposals to Council.

## **16 CONSULTATION**

- 16.1 Details of the consultation process and responses received are included in section 8.1.

#### Contacts for further information

Stuart McKellar – 01344 352180 [Stuart.mckellar@bracknell-forest.gov.uk](mailto:Stuart.mckellar@bracknell-forest.gov.uk)

Arthur Parker – 01344 352158 [Arthur.parker@bracknell-forest.gov.uk](mailto:Arthur.parker@bracknell-forest.gov.uk)

## Commitment Budget 2022/23 to 2024/25

	2021/22 £'000	2022/23 £'000	2023/24 £'000	2024/25 £'000
<b>Central</b>				
Approved Budget	14,853	14,992	13,524	13,520
Residents Survey				20
Local Development Framework		-223	-4	102
Insurance		-30		
Organisational Development		-15		
Council Tax Support		-500		
Income from Bracknell Town Centre		-20		
Highways Maintenance		-100		
Support for the Local Economy		-600		
Training - Education and Learning		20		
Net Inter Departmental Virements	139			
<b>Central Departments Adjusted Budget</b>	<b>14,992</b>	<b>13,524</b>	<b>13,520</b>	<b>13,642</b>
<b>Delivery</b>				
Approved Budget	15,501	15,856	15,468	15,772
Waste Disposal PFI		-319	227	104
Neighbourhood Plan Referendums - Warfield and Winkfield			-60	
Greening Waste Collection Arrangements		0	-13	-15
Borough Elections			120	-120
Invest to Save - Food Waste Collection Vehicle		-13		
Car parking		-56		
Revenue impact of 2022/23 Capital Programme - London Road Landfill Works			30	
Net Inter Departmental Virements	355			
<b>Delivery Adjusted Budget</b>	<b>15,856</b>	<b>15,468</b>	<b>15,772</b>	<b>15,741</b>
<b>People</b>				
Approved Budget	61,278	61,479	63,109	62,927
Suitability surveys		-20		20
Schools Budget - Funding for New Schools		-45	-182	
Schools Budget - High Needs deficit to be charged to the Dedicated Schools Grant Adjustment Account		2,557		
Journey to Parenthood		7		
Education & Learning - NEET Prevention Programme		-25		
Additional Income / Expenditure Reductions		-13		
School Accommodation		-200		
Welfare Support		-327		
Mental Health Initiatives		-250		
Coopers Hill Site Officers		-17		
School crossing patrollers		-37		
Net Inter Departmental Virements	201			
<b>People Adjusted Budget</b>	<b>61,479</b>	<b>63,109</b>	<b>62,927</b>	<b>62,947</b>
<b>Total Service Departments</b>	<b>92,327</b>	<b>92,101</b>	<b>92,219</b>	<b>92,330</b>
<b>Non-Departmental / Council Wide</b>				
Approved Budget	-17,546	-18,241	-19,711	-18,940
Minimum and Voluntary Revenue Provision		178	223	279
Increase in employers Pension Fund contributions		660	300	300
2021/22 Capital Programme - (Full Year Effect) Interest		-50		
2021/22 Use of Balances (Full Year Effect) - Interest		10		
2022/23 Capital Programme - Interest		67	66	
Earmarked Reserve - Funding for New Schools		45	182	0
Schools Budget - High Needs deficit to be charged to the Dedicated Schools Grant Adjustment Account		-2,557		
Council Tax Support		500		
Welfare Support		327		
Carbon Reduction		-150		
Employee Initiatives		-500		
Net Inter Departmental Virements	-695			
<b>Non-Departmental / Council Wide Adjusted Budget</b>	<b>-18,241</b>	<b>-19,711</b>	<b>-18,940</b>	<b>-18,361</b>
<b>TOTAL BUDGET</b>	<b>74,086</b>	<b>72,390</b>	<b>73,279</b>	<b>73,969</b>
<b>Change in commitment budget</b>		<b>-1,696</b>	<b>889</b>	<b>690</b>

For management purposes budgets are controlled on a cash basis. The following figures which are used for public reports represent the cost of services including recharges and capital charges:

	2021/22 £'000	2022/23 £'000	2023/24 £'000	2024/25 £'000
Central	19,872	18,404	18,400	18,522
Delivery	15,168	14,780	15,084	15,053
People	81,386	83,016	82,834	82,854
Non-Departmental / Council Wide	-42,340	-43,810	-43,039	-42,460
	74,086	72,390	73,279	73,969

#### Movements

	2022/23 £'000	2023/24 £'000	2024/25 £'000
Central	-1,468	-4	122
Delivery	-388	304	-31
People	1,630	-182	20
Non Departmental/Council Wide	-1,470	771	579
	-1,696	889	690

**EXTRACT FROM THE MINUTES OF THE OVERVIEW AND SCRUTINY COMMISSION  
MEETING HELD ON THE 13 JANUARY 2022**

**52. Budget Consultation**

The Commission considered the Council's draft budget proposals for 2022/23 before deciding whether they supported the recommendations which were open for public consultation. The Commission invited Councillor Heydon, Executive Member for Transformation and Finance and Stuart McKellar, Executive Director: Resources to attend the meeting to answer their questions on the details of the proposals. The Council's financial business partners: Helen Pennington, Paul Clark and Ken Robinson also attended the meeting to provide detailed information relating to services.

Arising from the discussion the following points were made:

- Assumptions had been made throughout the budget proposals as detailed settlement information was not available and known risks were projected so further adjustments would be made once the details were available and the level of pressures were confirmed.
- At the time the proposals were drafted a £3 – 5 million gap had been identified and an increase to council taxes by 4.49% would generate £3m towards that gap.
- The uncertainty of receiving an annual settlement for the third year made it difficult for longer term financial planning to be undertaken.
- The key message from the Executive Member for Transformation and Finance was that there were no proposed drastic reductions in services within the budget proposals.
- The settlement details announced an unexpected service grant for 2022-23 for £1.2m in addition to the funding expected.
- Although the borough's leisure services were contracted to Everyone Active, the Council continued to own the land and properties and therefore were responsible for their ongoing maintenance including the £120K golf green drainage and £50K roof repairs highlighted at both Coral Reef and Bracknell Leisure Centre.
- In relation to the roof repairs it was explained that the Sports Centre had multiple areas of roofing, a condition survey had been undertaken and this was a different area requiring maintenance in order to remain fit for purpose.
- In response to an enquiry on the sense of the ongoing cost repairs in favour of investing in a new building, it was explained that a long term project was in place to consider the changing requirements for residents but that ongoing maintenance was essential until a replacement was required.
- The £100K cost of remedial repairs to High Street car park to deal with cracks in concrete was raised, although it was noted that this was a safety issue requiring attention it was the quality of the system managing entry to the site which was of concern to some members. **Action: Executive Director: Delivery to take the concerns regarding the ANPR system back to the Parking Team.**
- It was clarified that the £100K on page 32 of the agenda papers referring to Local Transport Plan schemes related to improvements to the highways network.

- It was noted that the estimated £3.25m to be received from Community Infrastructure Levy was difficult to predict and would not cover these requirements of the significant infrastructure within the borough.
- In response to concerns raised regarding the lifespan of laptops and the technology available it was explained that the laptop refresh and replacement programme referred to on p.32 aimed to renew equipment every four years. This was part of the asset management programme with priority given to replacing older equipment. Councillors were reminded to report any equipment issues to the ICT Helpdesk.
- The Invest-To-Save scheme set out on page 31 of the agenda papers was highlighted as providing the opportunity for investing in innovation and new technology.
- Concerns were raised regarding potential missed opportunities to reduce climate change impacts when property repairs and maintenance were undertaken such as installing solar panels or insulation or to future proof equipment for example choosing boilers capable of being converted to use hydrogen. The agenda papers indicated on pages 40 and 41 that the impact on climate change had been assessed as not applicable. In response the Executive Member for Transformation and Finance stated that as a matter of practice professionals assessed sites for suitability for such schemes. **Action: Executive Director: Resources to feed these concerns back to the Assistant Director: Property.**
- It was confirmed that the Bridgewell Centre was not currently functioning as an Adult Social Care asset as it was being prepared to be redeveloped. A feasibility study would be developed to explore how it could be used as an asset to respond to the increased number of older residents with learning disabilities.
- The significant range of proposed cost for the works to address a safety issue at Garth Hill College was queried. It was noted that although this was a relatively new building this was not a design fault. The wide range in the estimate figures reflected that there were a number of potential solutions which were originally proposed but a cheaper scheme, expected not to exceed £150K, was being developed and would be funded from the capital programme. This was an example of changing information since the budget proposals were developed.
- The deletion of the climate change reduction initiative was challenged, and it was explained that this had been approved for 2021/22 only. The ongoing approach to achieve climate change objectives was to ensure all spending decisions incorporate climate change consideration in their implementation. New climate change initiatives were also deliverable via the invest to save scheme.
- The Council had currently borrowed £80 million. This was made up of a range of loans with some due to be repaid over two and three years with others being repaid over a 50-60 year term. The average interest rate was 2 - 3%. This borrowing was monitored and reported through the Governance and Audit Committee.
- A review of the draft budget proposals would be undertaken to reflect changing circumstances which would present an updated assessment of the budget gap for councillors to assess how to bridge the gap from various options.
- It was acknowledged that the budget to cover the cost of Conservation and Heritage advice was not sufficient to cover the costs resulting from dealing with heritage matters.



- It was confirmed that if the additional costs incurred from dealing with Planning appeals could not be recovered, they would be reported as a pressure on the budget.
- It was highlighted that in relation to the removal of the Climate Change Carbon Reduction Initiative it was not mentioned in the report that it was a one-off government grant.
- It was suggested that it would be useful to include further explanation at 5.2 on page 40 regarding the removal of items approved for one year as it was not clear. It was clarified that there had been a significant generous funding package to target the covid response and this had been used to pump prime some initiatives but this was supplementary to core budgets.
- The objective of the additional funding proposed to implement hybrid meeting was to enable full participation.
- Concerns were highlighted relating to the significant funding required for the pressures identified for both Special Educational Needs and Disability (SEND) (£7.5 million) and the High Needs Block (£20 million). It was confirmed that 8% government funding increases had been received in the previous two years but this was still lower than the pressures experienced so the costs continued to increase. This was a national issue and local authorities had a three-year period in which to balance their income and expenditure and there was another year to go in the process. The expectation was then to consider the accumulated deficit position nationally before further decisions were made.
- It was confirmed that the costs associated with restructuring the Special Educational Needs and Disability (SEND) team would be considered as part of the final proposals but those costs had not been included in the draft proposals.
- The approach used to model the potential costs in uncertain circumstances was for services to develop best and worst case cost scenarios.
- The Employment Committee was undertaking a project to review initiatives to address increasing staffing costs, retention issues and agency workers within social care.
- It was acknowledged that the costs associated with waste management were complicated and there was a difficult balance between increasing the level of food waste collected and the cost benefits that could be achieved due to the thresholds within the current contractual arrangements.
- Although there was business rate relief available for small businesses there was not something specifically in place to promote or support new businesses. This was a national position rather than a local choice option.
- It was accepted that the £500K saving on agency staff spend was proposed as a speculative target against the current £4m spend. The intention was to provide a challenging but deliverable target to frame the ongoing work to reduce core spending within the organisation and as such reduce the risk of overspending. It was acknowledged that although the cost of agency staff had been identified as a challenge in the past a savings target had not previously been set.
- In previous years a handful of people responded to the public consultation and this tended to fluctuate when there was a particular issue. To date 70 responses had been received with a large number appearing to be from taxi drivers regarding proposed changes to licensing charges.
- The consultation was promoted through social media, via business newsletters and other publications.
- It was explained that undertaking a participatory budget exercise would not be possible without the certainty of a longer-term settlement.

- The Department for Education were reducing by 20% per annum grant support for a range of areas supporting vulnerable pupils, such as education support for children looked after. The pressure of £71k was to supplement this funding to ensure the continuation of this support.
- It was confirmed that the Council currently had £10m in general reserves and £18m in future funding reserve as funding issues had been anticipated for some time. In the past the Audit Commission had recommended that Councils retain 5% in reserves but there was no restrictions or limits. Councils were in different financial positions across the country. It was clarified that it was misleading as for example due to changes in business grants additional funding was available but the Council had been unable to spend it during the year it had been awarded. The large amounts provided to support the response to covid had been paid out directly to local businesses in the form of business grants.
- It was reflected that the Councils reserves were prudent with significant issues on the financial horizon and that the reasons for maintaining the current levels of reserves needed to be robust so as not to be interpreted as additional or available.
- It was explained that there was no correlation between the level of the New Homes Bonus and target number of new homes that needed to be built in the borough.
- It was reiterated that in uncertain circumstances the best case budget scenario would be included in the reviewed draft proposals and that the risk of the worst case scenarios would be managed through corporate contingency planning.
- **Action: Executive Director: Resources to advise the Commission on details of the combined figure of £230K listed as 'Other' on page 29 of the agenda papers which related to Property Services**

**The Commission supported the recommendations as presented in the agenda papers relating to the capital programme and the revenue element of the budget.**

# Budget Consultation Final Report 2022/23



## Report Settings Summary

Event	<b>Budget Consultation 2022/23</b>
Total Responses	<b>86</b>
Total Respondents	<b>1</b>
Questions	<i>Custom selection (see Table Of Contents)</i>
Filter	<i>(none)</i>
Pivot	<i>(none)</i>
Document Name	Budget Consultation Final Report 2022/23
Created on	2022-01-26 16:07:52
Created by	John Ainsworth

**Table .1**

**Efficiency savings ..... 3**

**Why proposed efficiency savings ..... 4**

**changes to services ..... 5**

**why changes to services ..... 6**

**fees and charges ..... 7**

**why fees and charges ..... 8**

**Capital Spending Proposals ..... 9**

**Capital Comments ..... 10**

**Other Comments ..... 11**

**Questions ..... 12**

# Efficiency savings

Question responses: 31 (36.05%)

To what extent do you agree with the proposed efficiency savings?

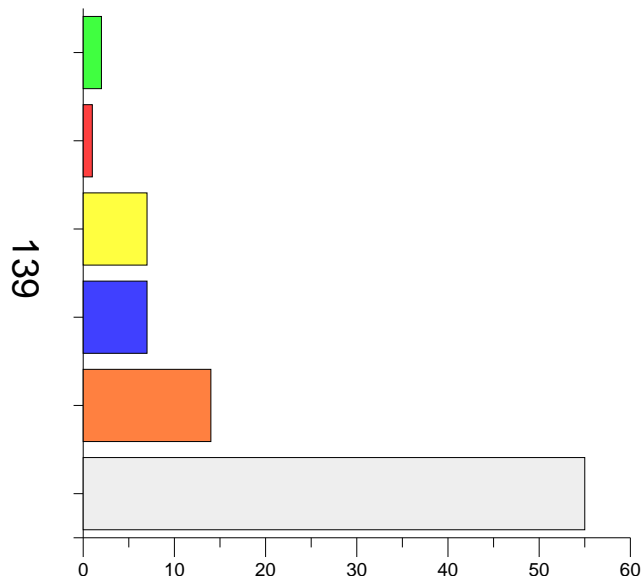


Table .1

	% Total	% Answer	Count
Strongly Agree	2.33%	6.45%	2
Agree	1.16%	3.23%	1
Neutral	8.14%	22.58%	7
Disagree	8.14%	22.58%	7
Strongly Disagree	16.28%	45.16%	14
[No Response]	63.95%	--	55
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	<b>86</b>

Table .2

# Why proposed efficiency savings

Question responses: 17 (19.77%)

Please tell us why you agree or disagree with the proposed efficiency savings

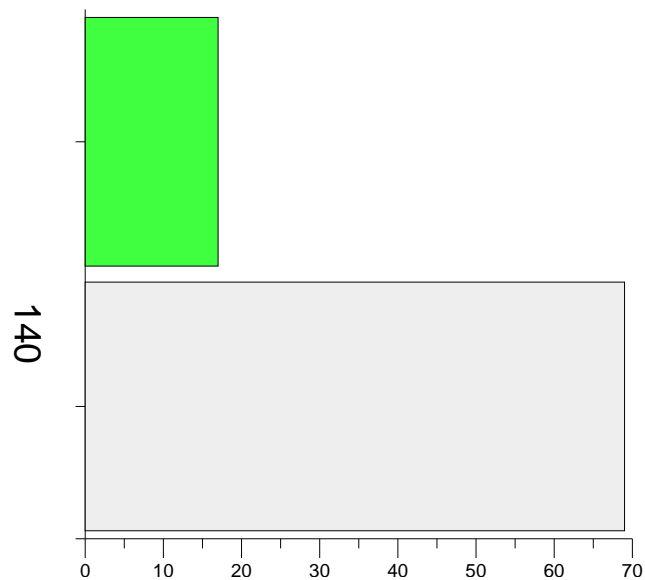


Table .1

	% Total	% Answer	Count
<span style="color: green;">■</span> [Responses]	19.77%	100.00%	17
<span style="color: grey;">■</span> [No Response]	80.23%	--	69
Total	100.00%	100.00%	86

Table .2



## changes to services

Question responses: 21 (24.42%)

To what extent do you agree with the council's proposals to increase expenditure in specific areas?

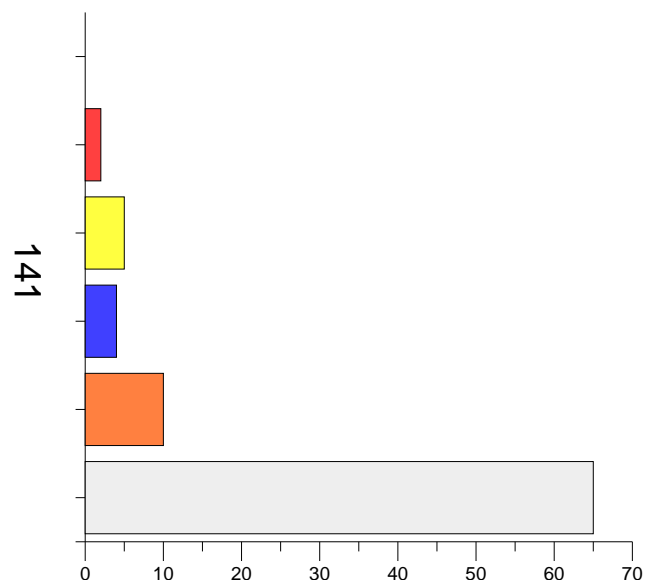


Table .1

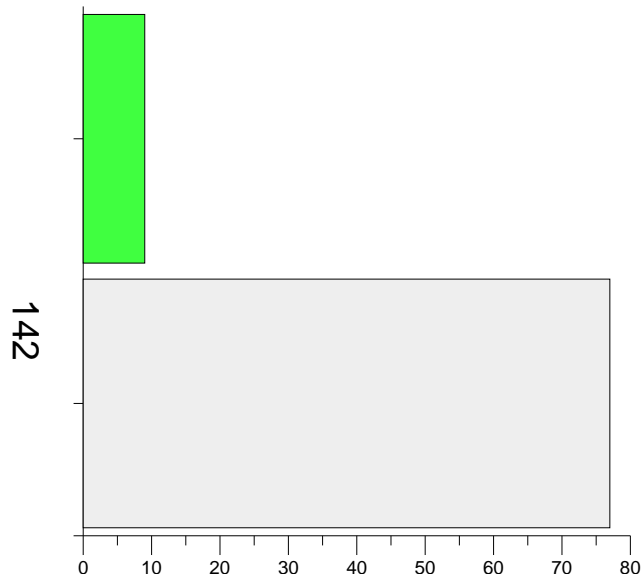
	% Total	% Answer	Count
Strongly Agree	0.00%	0.00%	0
Agree	2.33%	9.52%	2
Neutral	5.81%	23.81%	5
Disagree	4.65%	19.05%	4
Strongly Disagree	11.63%	47.62%	10
[No Response]	75.58%	--	65
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	<b>86</b>

Table .2

# why changes to services

Question responses: **9 (10.47%)**

Please tell us why you agree or disagree with the council's proposals to increase expenditure in specific areas



**Table .1**

	% Total	% Answer	Count
<span style="color: green;">■</span> [Responses]	10.47%	100.00%	9
<span style="color: grey;">■</span> [No Response]	89.53%	--	77
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	<b>86</b>

**Table .2**

# fees and charges

Question responses: 79 (91.86%)

To what extent do you agree with the council's proposed fees and charges?

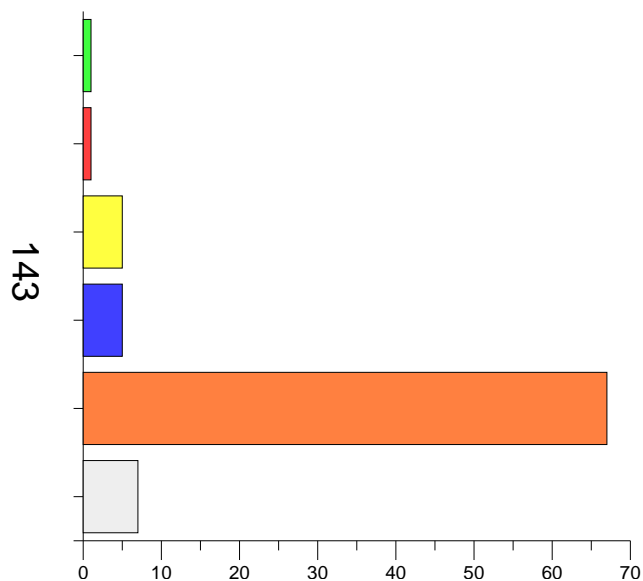


Table .1

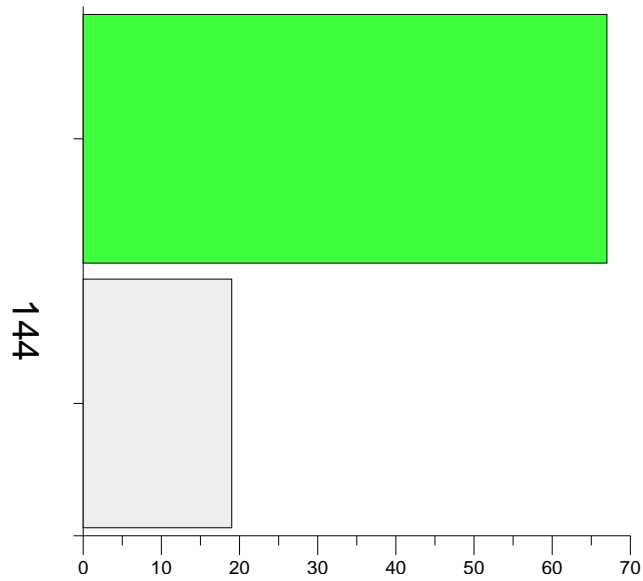
	% Total	% Answer	Count
Strongly Agree	1.16%	1.27%	1
Agree	1.16%	1.27%	1
Neutral	5.81%	6.33%	5
Disagree	5.81%	6.33%	5
Strongly Disagree	77.91%	84.81%	67
[No Response]	8.14%	--	7
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	<b>86</b>

Table .2

# why fees and charges

Question responses: **67 (77.91%)**

Please tell us why you agree or disagree with the council's proposed fees and charges



**Table .1**

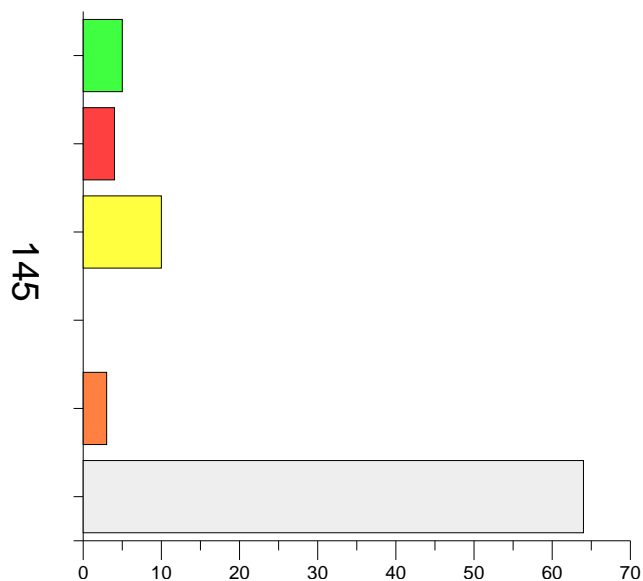
	<b>% Total</b>	<b>% Answer</b>	<b>Count</b>
<span style="color: green;">■</span> [Responses]	77.91%	100.00%	67
<span style="color: grey;">■</span> [No Response]	22.09%	--	19
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	<b>86</b>

**Table .2**

# Capital Spending Proposals

Question responses: **22 (25.58%)**

To what extent do you agree with the council's capital spending proposals?



**Table .1**

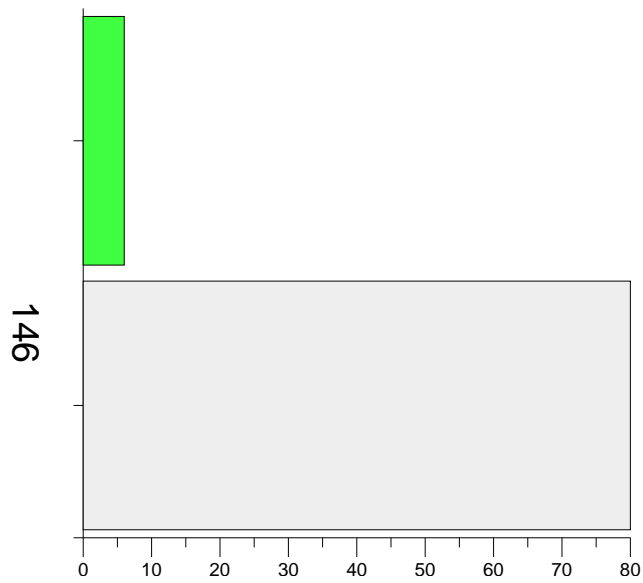
	<b>% Total</b>	<b>% Answer</b>	<b>Count</b>
<span style="color: green;">■</span> Strongly Disagree	5.81%	22.73%	5
<span style="color: red;">■</span> Disagree	4.65%	18.18%	4
<span style="color: yellow;">■</span> Neutral	11.63%	45.45%	10
<span style="color: blue;">■</span> Agree	0.00%	0.00%	0
<span style="color: orange;">■</span> Strongly Agree	3.49%	13.64%	3
<span style="color: grey;">■</span> [No Response]	74.42%	--	64
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	<b>86</b>

**Table .2**

# Capital Comments

Question responses: **6 (6.98%)**

Please tell us why you agree or disagree with the council's capital spending proposals



**Table .1**

	% Total	% Answer	Count
<span style="color: green;">■</span> [Responses]	6.98%	100.00%	6
<span style="background-color: #d3d3d3;">■</span> [No Response]	93.02%	--	80
Total	100.00%	100.00%	86

**Table .2**

# Other Comments

Question responses: 11 (12.79%)

Please add any other comments

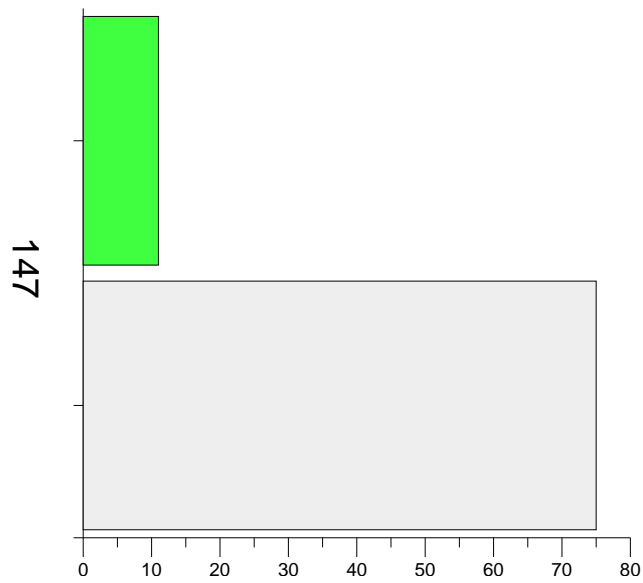


Table .1

	% Total	% Answer	Count
<span style="color: green;">■</span> [Responses]	12.79%	100.00%	11
<span style="color: grey;">■</span> [No Response]	87.21%	--	75
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	<b>86</b>

Table .2

# Questions

Question responses: 7 (8.14%)

Please add any questions you may have

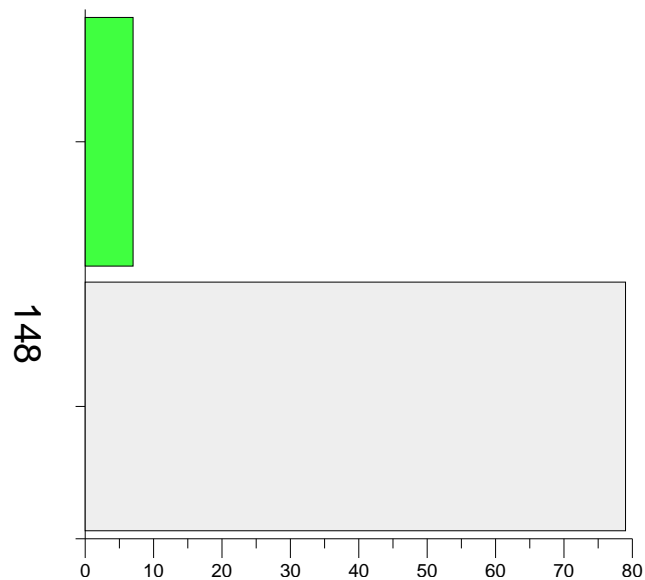


Table .1

	% Total	% Answer	Count
<span style="color: green;">■</span> [Responses]	8.14%	100.00%	7
<span style="color: grey;">■</span> [No Response]	91.86%	--	79
Total	100.00%	100.00%	86

Table .2





Copies of this booklet may be obtained in large print, Braille, on audio cassette or in other languages.

To obtain a copy in an alternative format please telephone 01344 352000

### Nepali

यस प्रचारको सक्षेप वा सार निचोड चाहिं दिइने छ ठूलो अक्षरमा, ब्रेल वा क्यासेट सूनको लागी । अरु भाषाको नक्कल पनि हासिल गर्न सकिने छ । कृपया सम्पर्क गनुहोला ०१३४४ ३५२००० ।

### Tagalog

Mga buod/ mga hango ng dokumentong ito ay makukuha sa malaking letra, limbag ng mga bulag o audio kasette. Mga kopya sa ibat-ibang wika ay inyo ring makakamtan. Makipag-alam sa 01344 352000

### Urdu

اس دستاویز کے خلاصے یا مختصر متن جلی حروف، بریل لکھائی یا پھر آڈیو کیسٹ پر ریکارڈ شدہ صورت میں فراہم کئے جا سکتے ہیں۔ دیگر زبانوں میں اس کی کاپی بھی حاصل کی جا سکتی ہے۔ اس کے لیے براہ مہربانی ٹیلیفون نمبر 01344 352000 پر رابطہ کریں۔

### Polish

Streszczenia lub fragmenty tego dokumentu mogą być dostępne w wersji napisanej dużym drukiem, pismem Brajla lub na kasecie audio. Można również otrzymać kopie w innych językach. Proszę skontaktować się z numerem 01344 352000.

### Portuguese

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## Responses to the Public Budget Consultation

ID	Please tell us why you agree or disagree with the proposed efficiency savings	Please tell us why you agree or disagree with the council's proposals to increase expenditure in specific areas	Please tell us why you agree or disagree with the council's proposed fees and charges	Please tell us why you agree or disagree with the council's capital spending proposals	Please add any other comments	Please add any questions you may have
60 identical responses received from taxi drivers (all but 1 quoting name and badge number)			<p>I'm a Bracknell licensed hackney taxi driver. The reasons I'm commenting is to appeal for OBJECTIONS at these 3 fees below which I'm not satisfied. Because we have raised this issue before a year ago. 1) Disclosure and Barring Service (DBS) Proposed increase from £67 to £94 WHY? My understanding is, I think the licensing department are comparing or making the same rates with West Berkshire and Wokingham (PPP). Our rate is entirely lower than theirs. DBS Should it be implemented immediately of £13 per year charge once you register as Licensing Officer Julia O'Brien mentioned at the Committee meeting held on 21 October 2021. When the actual government website they reduced the fees for DBS on the 1st October 2019 from £44 to £40 for every 3 years of renewal. In January 2020 also implemented the charge of £13 per year. Our DBS is called enhanced, I understand every council is different the way they charge. Should be only charging a small percentage of the fee, unless wanted to make extra revenue which is unfair to us. We want an explanation WHY, charge wasn't implemented? We will be requesting a "REFUND". Therefore, with the new software the system playing the part soon should be simple and quick to use. 2) VEHICLES EXTENSION. (For age of vehicles request for extension, SHOULDN'T BE CHARGEABLE of £59 at ALL. Since beginning of the pandemic NO single Hackney Licensing Officer been doing it the vehicle check for extension. Basically we're doing ourselves by taking pictures the condition in and out of our vehicle with mileage, it takes about 10 minutes to do it and emailing you with payment. Inspection fee is a Committee/Executive made decision 3 years ago by implementing without consulting us, we feel they may have been misled by licensing to vote this through. The fee has already been written into our annual fees and accounted for. We are being charged again for something that has already been in our fees. Pushed in through back door. We should not be charged anything for vehicle check and refunding process fee. Before, why were all drivers asked in questionnaire if they agreed with</p>			

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			this extra charge, if you were going to ignore the findings anyway? Another reason we have had hackney vehicle inspection every 6 months after the vehicle age is over 5 years from first registration. 3) REFUND PROCESS CHARGE OF £30 (SHOULD BE FREE OF CHARGE ). Also our trade is in decline, one third left of our income. UBER killed our business completely since 2014. It started operating in our town and they haven't been paying any fees to our local authority, they are licensed by TRANSPORT FOR LONDON (TFL) and working in our borough how can be justify? We keep mentioning in every meeting for our local authority to help us by stopping them operating in our borough in the difficult times, they are jeopardise our livelihood but all you have done it is to give them an illegal grant so far. Lets hope all this will be discussed on the 24th January 2022 in the trade zoom meeting.			
7	public access to services needs to be maintained with access to people not just self serve		inflation effects all residents and any other increases will only put more pressure on spending in other parts of the council budget in supporting poorer residents			
9	Providing Open+ hours for libraries does not provide as good a service as staffed access. I prefer being able to speak to staff for help with finding books and using a computer. I have also found meeting people in libraries for events a lifeline because of feeling lonely.			To help respond to the consultation it would be useful to know what the proposed reduction in staff equals to in terms of reduction in staffed opening hours at specific libraries.		
10				I disagree with the number of staff cuts proposed.	Mental health of the elderly and vulnerable would be compromised if staff cuts are made in community.	How are you considering tackling mental health issues? Are you considering reducing hours of public meeting places such as libraries? This would have a damaging effect on

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						young, elderly and vulnerable.
64	There have been enough cuts to date and for my part the library is an important community service and services need to be maintained for the well being of many residents who use our libraries.	We need to know where the expenditure will be, as if cuts to the library services are intended, these will not be in the interests of the community.	Increase of fees will be detrimental to many people who are struggling with everyday bills and the library service is sacrosanct; meeting staff when visiting the library.		For my part the Sandhurst library and the staff is my may concern as it has helped me mentally over the years and many other people also. Sandhurst library is conveniently located and having additional open plus days would be extremely difficult for some people who rely on the groups meeting there ie. scrabble. book groups, brain gym and, of course, the talks.	Is there any likelihood of extending Sandhurst library as was considered some time ago. This would be a great asset to the library for the community and could be used for paying groups. It would also be good if toilet facilities could be reinstated and if these were to be accessed by way of card payment, tis would alleviate vandalism which, evidently, was the reason for the closure.
65	Sandhurst Library is as far as I know is well used. There are always	I have no idea what you are going to spend or what it will be on.	I have no knowledge what is being charged	Residents of Sandhurst have put up with the staff having to re-apply for	Hands off our library in Sandhurst	

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	people there when I am. There are still some clubs not back as before Covid unfortunately which many of us are missing.			their jobs over the Bracknell area even if they haven't got transport to get there. We know have staff from other parts of bracknell area, not necessarily Sandhurst who do not know Sandhurst and clients being advised to go to other libraries. We have now got volunteers. We have not much that Sandhurst has that's paid for by Bracknell and as its well used find it difficult to think it is being cut back.		
76	i disagree with the library budget cuts because the public not only use the libraries to choose books but to speak to staff for advice and information, not only on books, but on events happening in the libraries and in the villages					
77					I am concerned at the reduction of Library staff. Although fully supporting the	How soon do you intend to open the Exterior access points they do help a

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					availability of having access using the automated access points, there are many times where extra information and guidance can only be found with the librarian. For example, I can find and request books on the internet but if I want to pay the charges using my points on my Library/Bus Pass card I can only do it through the librarian. During the current COVID epidemic my wife and I being vulnerable and in our 80s, were in isolation for long periods, without the care and devotion of current library staff our lives	lot in those locations when the library has limited opening hours.

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					would have been miserable. There are not many now and what they achieve is commendable, I urge you to reconsider reducing the numbers of these excellent librarians.	
79	I am very concerned at the proposal to decrease the staffing at libraries and use more Open+ hours. Firstly, we are very aware that covid is not going away. Who will ensure users wear masks and sanitise, thus putting others at risk who are already in the library. I am also concerned for staff doing lone working, particularly in the evening at smaller branches. Two full time positions lost would cut down the amount of stockwork and deliveries to branches, which are already fewer than we used to have. Another area of concern is the total lack of path maintenance. Cars are parking across on the pavements, particularly in North Ascot. On the Forest Road, the side of the footpath leading from New Road to the Braziers Lane crossroads is becoming narrower and narrower. The verge on the righthand side leading from the Heatherwood roundabout towards Bracknell is now constantly being used as a parking area, and where it was an attractive grass area is now a huge rutted mud heap. This is not a good impression for people coming from Windsor to drive to the Lexicon. RBWM seems to be addressing these sort of issues, and have even put up notices along roads about parking on the pavements in their council area.					
82	14.01.22 Re change in library hours. Sandhurst Library I belong to one of the 5 Book Clubs at the library which give me & many others great joy. In fact it's more than a library, it's a community centre which gives so much pleasure to a vast selection of the community, not just for books, but for talks, groups re memory games, quizzes, knitting & natter, craft sessions. The elderly in particular attend a number of these events & it's really good for them. Many of these activities I presume wouldn't be available if the 'staffed' hours were cut. We are lucky to have some dedicated librarians & volunteers at Sandhurst Library, it would be sad to make them think their contribution to the community isn't appreciated. Sandhurst library is perfectly located, plenty of parking spaces, easy access through building, lovely modern open building. After a lot of effort I found the Consultation document re staffing of libraries for future two years. I appreciate the fact that you've got to balance the books, but couldn't the money saved from the libraries budget be saved from other					



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	budgets? I noticed that Emergency Housing cost a lot of money because you have to use bed & breakfast places. In the long run wouldn't it be better/more cost efficient to build somewhere in the centre of Bracknell so that people had access to shops & transport. Something in the vein of the IKEA 'Cubes' - which are like mini flats, all self contained, linked together in an attractive shape. How is a huge amount spent on Home to School transport, or am I reading that incorrectly, & why are individual taxis required to take them out of the area? If they go to the same schools, couldn't you use the mini buses like the ones used at Sandhurst Day Centre - they take several wheelchairs at a time. At present it looks as if the taxi drivers have very lucrative contracts. Dianne Sims 26 Perryhill Drive Sandhurst					
83					I regret any further degradation of Library services. We have already lost professionals, relying on unqualified and volunteers and unstaffed times. The benefits of an efficient library service to young people , the elderly , those studying at home and people making up for poor schooling are outweighed by the modest cost.	
84	Because the savings do not go far enough given the present economic realities and the constraints that they place on individuals, local and central government.	The council should be seeking to contain expenditure in all situations and quite clearly proposed expenditure levels should be evaluated on a simple scale on	Where fees and charges are concerned, there is a clear mismatch between the likely rates of inflation for the upcoming year and proposed fees - which in some cases will produce a diminished revenue in real terms. The	In the current economic climate, it is difficult to support in the short term any capital expenditure beyond the absolutely essential for 2022/23 and probably one or two years further forward. Certainly, 'pet scheme' expenditure	The proposed increase in Council Tax is unwelcome, given the freezing of income tax thresholds, the upcoming rise in National Insurance contributions and the forecast big increase in energy bills - all this against a	For context, it would be useful to see details of staff numbers, salaries and associated pension liabilities and the proposed reductions moving forward. While it is understandable that IT systems and computer equipment

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		the lines of 'absolutely essential' , 'highly desirable' , 'traditional - whether needed or not' and 'non-essential'.	council should set charges that more closely reflect the true cost of providing the service or facility in question. There should not be any element of general subsidy provided by the majority in order that a minority can enjoy that service or facility.	should be halted for the time being.	background of rising (and probably persistently high) inflation during 2022. Neither central nor local government appears willing to provide a supportive climate for business. Yet it is only through thriving local businesses - small businesses as well as larger corporations - that real wealth can be generated. We need that generation of wealth to allow public sector organizations, councils included, to have money to spend in the first place.	should be updated, where is the evidence for achieving more with less as a result of that update?
86	How can you save on already cut services, not by	Refurb your offices but cut our services	2.5% on social care, surely the NI increase covers that Cutting	Where do you think we are going to get the money to pay for	I do not agree with your proposed increase, services	Where has the money earmarked for services that have

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	asking for more money		services again but asking to pay more is stupid Take a few cuts in your own pay, perks etc	your extravagant spending plans	have been cut and we are paying for nothing Also additional payments for services that the council should provide I wonder if you live in real world as you constantly misspend our CT and have the gall to ask for more	been cut gone Where are the additional bins requested gone Why is the council constantly ignoring the wishes of the CT payers
87	As a resident and user of libraries both during staffed hours and open plus I am appalled that you are think reducing staffed hours and increasing open plus is a benefit to us. Not only do the staff hold valuable knowledge they are there to help and give assistance which is invaluable. They facilitate so many activities for all including elderly and young children. I witnessed myself the joy of a school visit whilst visiting and this is a vital link to education that your staff are able to provide. Our communities will be poorer if you make these changes. This is not increasing a service.					
90	I disagree with this because it means that valued staff will lose hours or their jobs.					
91	The council seem to be making savings at the expense of services that are required but seem to spend money on things that aren't required	The increase is in areas that don't really require. For example a chunk of money on office refurbishment is this something. A: That's needed ( I	I think as there is already an NI increase of 1.25 which is supposed to cover the increase and you are proposing a 4.5% increase which is a massive increase and there is no really benefit increase and you continue to remove services or these services aren't carried out efficiently.		To propose a 4.5 % increase when in the last two years you have as a council made savings of having half the workforce WFH. Using Covid as an excuse to not supply	Why as a council do you continue to refuse to supply the services that you are paid to supply? For example: I have on two occasions requested that you maintain the trees

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	and have no benefit to the community	doubt it) B: That actually benefits the community ( no it doesn't) but you cut refuse collection which is an essential services.			services that Covid wouldn't be effected as it's outside so Covid process aren't in place .	that encroach on to property and which is now covering and may cause damaged to property but your response is due to covid and we don't see it as a priority so you can do it yourself.
93	Unaware of any proposed efficiency savings.	My pension is not increasing by anywhere near the extra you are demanding. Also you have not explained why the spending is necessary.	My pension is not increasing by anywhere near the extra you are demanding.	My pension is not increasing by anywhere near the extra you are demanding. Also you have not explained why the spending is necessary.	Meanwhile our road is full of potholes (Mendip Road).	
94	Make efficiencies by (e.g.) cutting council executives salaries & expenses, and stopping acceptance of migrants. All	As a pensioner, I can't afford to subsidise any increases.	There wouldn't be any fees & charges if finances were managed properly.	Capital spending can't be justified while basic costs of living are increasing exponentially. Residents would rather have heating & food than live-	Bracknell Forest Council clearly has no understanding of how inflation is affecting residents.	What savings can be made so that council tax could be reduced, rather than compound increases being applied each year? (E.g. Having a mayor is an archaic,

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	income should be used solely for the benefit of tax-paying residents.			streamed council meetings.		vanity luxury that should be abolished. Likewise having a chief executive on a 6-figure salary.)
96	The cost saving suggestion for libraries is detrimental to the community, it is a much needed service for everyone especially the elderly who want to see people also not just a machine for them to take out books or return books .the staff are there to help people how can the library service offer a community service if,A there's no staff or B there's no libraries its outrageous that people getting paid far to much money for the jobs they do working from home for the last 2 years can even think about this as a proposal					

## Consideration of Budget Responses by Licensed taxi Drivers

Three specific comments were raised by 60 members of the taxi trade in Bracknell Forest in response to the public consultation on the Council's draft budget proposals, as set out in Annex C1. These comments have been assessed and a detailed response is provided below.

*It is correct that some charges payable by licensed taxi drivers are proposed to increase in 2022/23. However, the majority of fees (56%) for 2022/23 have been reduced when compared to 21/22. A further 11% have remained the same.*

*In relation to the current year, taxi drivers are one of many business groups who have continued to incur fixed operating costs (e.g. licenses, insurance, MOTs) while their revenues have been reduced by Covid restrictions. This has been recognised and licensed taxi companies and drivers have each been provided with over £9,000 in grant support during 2021 by the Council through the Additional Restrictions Grant, provided by the Government to support businesses affected in this way.*

*The specific comments raised are set out below (in bold) with responses in italics.*

### 1) Disclosure and Barring Service (DBS)

**Proposed increase from £67 to £94 WHY? My understanding is, I think the licensing department are comparing or making the same rates with West Berkshire and Wokingham (PPP). Our rate is entirely lower than theirs. DBS Should it be implemented immediately of £13 per year charge once you register as Licensing Officer Julia O'Brien mentioned at the Committee meeting held on 21 October 2021. When the actual government website they reduced the fees for DBS on the 1st October 2019 from £44 to £40 for every 3 years of renewal. In January 2020 also implemented the charge of £13 per year. Our DBS is called enhanced, I understand every council is different the way they charge. Should be only charging a small percentage of the fee, unless wanted to make extra revenue which is unfair to us. We want an explanation WHY, charge wasn't implemented? We will be requesting a "REFUND". Therefore, with the new software the system playing the part soon should be simple and quick to use.**

*The Public Protection Partnership (PPP) operates under a cost recovery model with an hourly rate of £59.00. The PPP hourly rate and fees are standard across all the authorities in the partnership.*

*DBS checks are all being completed by West Berkshire Council's Human Resources team. HR have re-assessed their fee for the DBS itself which is now £40 plus an administration charge of £9 per check. Added to this fee is a PPP admin fee equivalent to half an hour of officer time. Officers have to arrange appointments in an office and check documents brought in and enter information on the system as well as then checking the DBS website for the result. Where a DBS is not clear it then goes to a Licencing Officer who discusses and writes a decision criteria to be agreed by a senior officer. This is charged at half an hour - £30. We therefore propose to amend the fee in 2022/23 to £79.*

*An enhanced DBS is required for certain roles which includes taxi/private hire drivers. This is to allow licensing authorities to find out if someone is barred by the independent safeguarding Authority from working with children or vulnerable people before issuing a licence. It allows for licensing authorities to have access to relevant information to make informed decisions before granting taxi licences. This helps provide reassurance to*

customers who use taxis and private-hire vehicles which in turn is very important to the licence holder. This is standard practice across all licensing authorities for all drivers.

The DBS update service is available now and has been in place for some time. This is run by central Government. If a user registers within a month of receiving their enhanced DBS check at a cost of £13 they can renew annually at £13. A new taxi/private hire policy will be brought forward during 2022/23 and if approved, following consultation, it will recommend all drivers use this system.

**2) VEHICLES EXTENSION. (For age of vehicles request for extension, SHOULDN'T BE CHARGEABLE of £59 at ALL. Since beginning of the pandemic NO single Hackney Licensing Officer been doing it the vehicle check for extension. Basically we're doing ourselves by taking pictures the condition in and out of our vehicle with mileage, it takes about 10 minutes to do it and emailing you with payment. Inspection fee is a Committee/Executive made decision 3 years ago by implementing without consulting us, we feel they may have been misled by licensing to vote this through. The fee has already been written into our annual fees and accounted for. We are being charged again for something that has already been in our fees. Pushed in through back door. We should not be charged anything for vehicle check and refunding process fee. Before, why were all drivers asked in questionnaire if they agreed with this extra charge, if you were going to ignore the findings anyway? Another reason we have had hackney vehicle inspection every 6 months after the vehicle age is over 5 years from first registration.**

*During the Covid-19 pandemic the inspection for a vehicle extension was based on photographs of the interior, exterior and date and time stamped speedometer showing current mileage submitted by the drivers. Normally a physical check would be undertaken by Officers and this will return in the new financial year.*

*When an application is received Officers are required to work through the mileage records for the previous five years based on previous vehicle inspections. Officers calculate the average yearly mileage in order to work out if the vehicle meets the "abnormally low mileage" criteria set out in the current policy. A report is prepared and sent to the Licensing Team Manager who will either approve or refuse the application. A letter confirming the outcome is sent to the driver and if granted this will include the revised Age of Vehicle expiry date.*

*The system is updated to reflect the decision. If the application is not successful the driver will receive a suspension letter once the current age of vehicle expiry date passes. It is estimated that this work would take an hour and it is therefore costed at £59.*

*The drivers have commented that they are under the impression that this fee is included in their annual fee. This is not the case. As set out above Officers are required to undertake additional processes for this check.*

**3) REFUND PROCESS CHARGE OF £30 (SHOULD BE FREE OF CHARGE). Also our trade is in decline, one third left of our income. UBER killed our business completely since 2014. It started operating in our town and they haven't been paying any fees to our local authority, they are licensed by TRANSPORT FOR LONDON (TFL) and working in our borough how can be justify? We keep mentioning in every meeting for our local authority to help us by stopping them operating in our borough in the difficult times, they are jeopardise our livelihood but all you have done it is to give them an illegal grant so far.**

*As stated above the PPP operates on a cost recovery process, the issuing of a refund takes about half an hour of work and therefore a charge needs to be attached to this activity. The fee charged is comparable with other Local Authorities.*

*The Licencing team wrote to the trade during the statutory consultation on variations to operators and vehicle licence fees which covered the following fees:*

<i>Hackney carriage vehicle new / renewal</i>
<i>Private hire vehicle new / renewal</i>
<i>Home to School vehicle new / renewal</i>
<i>Private hire vehicle with dispensation new/ renewal</i>
<i>Temporary Vehicle Licence (issued up to 3 months Maximum)</i>
<i>Private hire operator licence new/renewal</i>

*Drivers that responded to the consultation with comments about other fees not listed above were advised that these comments should be directed to the consultation on the Council's budget. Responses were not ignored as they are being dealt with in this response. The issue will also be reflected in a report going to the Licensing Committee in February.*

### **Uber**

*The drivers concerns around Uber have been raised repeatedly at the Taxi Liaison meetings and also emails to the Licencing team. It has been repeatedly explained that Uber is able to operate legally in Bracknell although not licensed as an Operator with Bracknell. As such no action can be taken by the Licencing team in relation to competition. Action can only be taken against Uber drivers who do not act in accordance with their licence for example if they park illegally or are plying for hire.*



## Labour's Response to the 2022/23 Budget Consultation

These budget proposals reflect the very tight finances experienced by all Local Councils. The papers of the consultation are clear and, in most cases, comprehensible. These proposals have again had to be publicised for consultation before the actual Provisional Finance Settlement figures from the Government have been received. They have therefore been proposed based on past grant levels. We acknowledge the expertise and experience of the officers will have enabled accurate predictions, as has proved to be the necessary case in the last few years, due to the late publication of the Government Settlement.

Government funding for local Councils has been severely cut in recent years and past budgets have reflected streamlined departments and efficiency savings so that there is now very little 'fat' left. Indeed, the potential gap of around £3.013m or £4.877m depending on the best- or worst-case scenarios, identified in December, cannot be made by just efficiency measures. The need to include the 'best case' and worse' case figures highlight the uncertainty of future needs and costs. It looks unlikely that the Government will provide any in year extra funding to support any new pressures from Covid.

This budget, like those of the recent past, is dominated by the pressures due to Social Care Services for both adults and children. Extra Council tax can be raised to cover these costs, but this is a year when so many residents will also be funding a predicted 6% rise inflation, with huge hikes in energy bills and rent increases.

Government funding to Local Councils is said to increase by 3%, assuming all Councils raise their Council Tax to the maximum permitted level. This is to cover any future Covid-costs, funding for adult and children's social care, and the increased National Insurance payments for every employee, increased funding for Supporting Families, cyber security and.... and .....The Council can raise its Tax by 2% without a referendum, an extra 1% this year and the left over 1.5% for Social Care not used last year. This 4.5 % would be proposed when residents are experiencing such financial pressures to cover living costs for their homes, their heating, their food. This cannot happen.

Every 1% rise in tax in BF is said to raise £677K. BF has many band D properties and many properties rated in higher bands. Raising the Council tax here will give a good return but in a locality with few band D properties, the money raised will be much less BUT the pressures on Social Care are the same, or worse. Using Council Tax to cover the increasing costs in Social Care is a postcode lottery. This cannot be fair and equitable. Nor can it be sustainable in the long term. Central government should resource this with adequate increased Revenue Support.

We understand the need to prioritise maintenance and trust the contingency allows for any emergency.

Priority Planned Maintenance for schools is said to be £2.353m. £2m is expected from the DFE to finance this but this leaves £353K of identified priority work not covered. Moreover, in the papers it states that due to a revised capital funding formula, there will be no DFE funding provision for Bracknell Forest for 2022/23.

If this funding is now based on the perceived 'need for school places in Bracknell', then there is unlikely to be any such funding in the next few years either. What happens to our schools in the meantime?

More information should have again be included, to explain why the Council must pay for the repairs to the Leisure Centre, Coral Reef, and the Downshire Golf Course now that Everyone Active is running them. Explaining that, in the contract, BFC decided to retain ownership of the buildings and just outsource their management, so retaining responsibility for structural issues, would help answer residents' concerns. Large sums were spent on Coral Reef roof in the last few years. Is this to be an annual requirement?

There is no mention in any of these items as their effect on reducing the carbon footprint. But surely when roofs are repaired, insulation should be checked/enhanced, and the reduction monitored.

The same is true for the replacement of fascia- items C11 and C23  
The inclusion of the 'N/A' beside these items is concerning.

Hopefully the refurbishment of the housing stock -C15- will also result in improved insulation and reduced heating costs. If this is not planned, then it should be. A good use of 'Invest to Save'.

£50K seems an awful lot of money to provide reactive repairs on the Depot before it is replaced in the Spring of 2023

The need for expenditure on pages 73-77 is clearly explained and the detail included is appreciated. We support the Vehicle Monitoring System as it will hopefully end the need for Staff to deal with the traffic management issues and subsequent confrontation.

Whilst the detail included on these pages is appreciated, we condemn the detail included for the Garth Hill College Atrium Balconies and were appalled when we read it. The insurer's risk assessment should surely not have been included in public papers, nor the account of the student and the teacher.

This information is detrimental to the school and to the Council that has maintained the building for all these years.

The re-consultation on migration by the Warfield School should now have been completed and the outcome determined. This proposal predicts that the outcome will be for migration, once all the Highway changes have been explained. If this is not the case, will this £0.7m be withdrawn?

The highway maintenance seems to depend almost entirely on applying and achieving Government Grants, which mainly serve the more major roads, and developers' contributions.

Residents are also very concerned about roads nearer to their homes and trying to park near their houses. Some residents do not leave their home after 5.00pm because they will have nowhere to park on their return. There is no mention of any increased funding to provide more estate parking bays. These are so desperately

needed in the parts of BF where the houses are built in pedestrianised squares, with no driveways.

We note that £4.400m has been included to cover the expected 2% pay awards for this year and to cover the unexpected 1.75% for 2021/22; and any extra needed to cover a short fall for the 1.25% increased NI contributions, not covered by the additional grant settlement.

We ask that when contracts are renegotiated to minimise inflation, the pay and conditions of the contracted staff is also considered, so that all are paid a living wage.

We support the increase in fees and charges in line with the BF policy and are pleased to note that the inflation increase is mainly 3%. However, we are concerned that the increased rate the replacement for windows and the installation of solar panels have had their fees increased by 27% and 22.4% respectively. Similarly, their regulation certificates have increased by 14.6% and 19.9% respectively.

This is a poor example of the Council encouraging residents to improve their homes to reduce the carbon footprint.

It would have been a very positive headline to announce that these fees are being subsidised by the Council, to encourage the uptake by residents, so supporting carbon reduction.

The promised government review into Business Rate Retention has not happened. This is probably good news for BF as the Council has benefitted from the present arrangement. The big multinational company that presently pays its rates to BF -£4m of support to the revenue budget a year - has not yet joined the Central Rating list, so BF will still benefit this year.

The huge 'windfalls' achieved by the Bracknell Forest Director of Finance in the past years from the Berkshire Wide Business Rates pilot is not mentioned in these papers. However, without winning the bid to run this pilot, the Council would not have been able to bank these bonuses, to support this and future budgets.

We understand about Spending on Schools being ring fenced.

Although, schools will receive an average increase in funding of about 2.8% per pupil, schools are still experiencing huge financial pressures and will have to provide the extra 1.25% NI for all their employees.

The big deficits come from trying to support the High Needs Block. Expenditure has been greater than income for several years, and whilst there is an increase of £1.56m to £20.7m the forecast for spending this year is £7.5m. This comes as a result of more students needing support and with greater complexity of need, often not available with in Bracknell forest. The overall deficit for this provision by 2023 is predicted to be £20m

The Government has previously stated that this accrued deficit is not a liability on the council and remains a DFE responsibility. Now, however, this underwriting is said to be just a three- year time limit period to enable the Council to plan to manage the debt from their own resources- by April 2023. £20m in a year! No time scale for the repayment or how the money will be found is known.

No plans were presented to the latest School's Forum- indeed no papers on this were presented at all. Was this an oversight?

We understand most of the high costs come from educating our young HN children out of the borough because BF does not have enough suitable placements. We support the work being done to enable more placements in BF for both primary and secondary children. If the provision is right, this must be better for the child as well as reducing costs in transport and charges. Will this be enough? The Home e to School Transport costs is predicted to be at least £650K. It states that the High Needs deficit is to be funded from the Schools Earmarked Reserves, but last year there were no funds in the Schools' Reserves. Has this changed?

This is a National Crisis and more money from central government is desperately needed to support Special Education. The Government's promised SEN review is urgently needed.

We welcome the contribution to the schools' budget of £182K to reduce the pressure on all our existing schools to finance the new builds as stated, but see this is included in the 2023/24 column?

Several of the one-year initiatives included last year have now been removed but surely, they still need funding as the issues themselves have not gone away.: - Staff retention initiatives; support for the local economy; mental health issues; climate change/carbon reduction initiatives  
No funding seems to be included for the Youth Facility at Braccan Walk. How will this be funded?  
We do not think this is yet open for use but would dearly like a visit if it is. This Youth Hub is very much welcomed.

We celebrate the reduced cost of recycling as a result of the superb response by Bracknell Forest residents to the Food Waste collection'  
Why is there still £60 included for the Bracknell Town Council Neighbourhood plan when this happened last year and has been removed from this year's budget, but added again for next year?

The reduction in the NEET prevention budget is concerning as this is so valued by the schools and the outcomes are positive. After the experience of Covid, I think this support and expertise is even more important for our vulnerable young people.

The Welfare support of £327K and the Council Tax Support of £500K  
Is added then removed on page 101, so I guess this means both have gone.  
This is difficult to understand.  
Are these provided elsewhere?

We note that more staff are being employed to fill gaps in expertise, but some vacant posts are no longer being funded, mostly in the IT department. Some 4/5 staff will face redundancy because it is said their skills are no longer needed to support the new operating model. Can training not be offered for them to work elsewhere?

There is also an Initial Equalities Screening Record Form describing the transfer of the Libraries to 'Community Management' to reduce the cost. Certainly, this has been kept very quiet and no discussion had so far with the Labour members, if with others. Real consultation was held a few years ago when the future of the libraries was threatened. Meetings were held in each community and the Executive member and the officers were there to explain the plans and listen to the residents. All the arguments included in this form are those presented by the residents at that time and support the reason the libraries should not be run by Community Managements. - reduced service, reduced activities, reduced support. We passionately oppose this proposal. We cannot find it anywhere else in the budget so how would anyone know this is being suggested. Not many residents would make it all the way to these pages, tucked at the back. This is certainly not being transparent.

There is also a suggestion in these Equality Screening papers about the closure of the R-Bus. This is a door-to-door service for adults with learning difficulties, all known to CTPLD. Users can use it at any time Monday – Friday until 9:30 pm, to attend organised groups or individual activities, reducing social isolation and loneliness. This also takes pressure of their careers and provides respite. We understand the use of this bus many have been negligible in the past two years because of COVID but surely Bracknell Forest can afford to support this provision.

Also included in these papers is the proposal to relinquish the Zone Youth Centre for letting and to provide a session in an alternative location in a nearby Community Centre. This is in a public document out for consultation and yet no one has had the decency to consult those who run the said Community Centre. Apparently, this document should never have been included in the budget papers. A truly unnecessary cause of stress and concern.

The biggest pressures are, as always from Adult Social Care Costs and Children Looked. The uncertainty of these budgets is reflected in the difference of the best and worse case for the Children Looked After provision. The 'worse case' is almost double the 'best case'.

The £71K addition to the Schools Budget shows the Council is again having to pick up the cuts from central government- this time to replace the funding to support vulnerable pupils.

We support the proper funding for the Family Group Conferences as these prevent expensive future expenditure.

We also support every effort to avoid the use of bed and breakfast accommodation for emergency housing.

The one-off schemes including to consider moving the library, a new Leisure centre, the biodigester, are all to be supported.

The one Savings Proposal that demands a response, is the proposal to cut the library staff by 2,2 full time equivalent by increasing the number of Open+ hours. The Inequalities Screening Form on library changes included in these papers explains

why this must be opposed. The Librarians provide a welcome to so many of our residents. They run 'story time' and 'book clubs. They encourage a love of reading in all who visit. Entering an empty building to change a book serves some of our residents but not those who see the library as the hub of the community. All libraries will be affected, There is no separate Inequalities Screening form for this included, although staff will be made redundant- another error!

Heathlands will be a very welcome provision

The Social Care Resourcing Campaign to attract permanent staff and reduce the reliance on agency workers is welcome for the good of all our clients, as well as for the budget.

At the last Council meeting, the Council were told that £180K had been allocated towards a Financial Hardship Fund. I can find no mention of this in the budget, but it will certainly be needed.

There is no mention of £76K to support South Hill Park, but we assume this is because there is no change and the funding remains.

We are fully aware that balances can only be used once but the balances are large and some of the above decisions will certainly unnecessarily affect the quality of life of our residents.

The Council Tax will have to be raised to cover the NI contributions and the Social Care demands, but it cannot be raised the full 4.5%. Many of our residents will find this next year incredibly hard. We need to ensure support is available and well publicised.

Mary Temperton

## CENTRAL - CHIEF EXECUTIVE'S OFFICE

Description Impact	2022/23 £'000	2023/24 £'000	2023/25 £'000
<b>Equalities and Engagement</b> Small reductions in budgets for publicity and marketing, licences, community centre equipment and other fees for bought in services.	-5		
<b>Communications and Marketing</b> Reduction in the photography/ videography budget for the central communications and marketing team.	-2		
<b>Devolved Staffing Budget</b> Increasing the devolved staffing budgets (DSB) to reduce the required Managed Vacancy Factor (MVF) to 1% and to address additional pressures as the current budget level is unsustainable.	3		
<b>CENTRAL - CHIEF EXECUTIVE'S OFFICE TOTAL</b>	<b>-4</b>	<b>0</b>	<b>0</b>

## CENTRAL – RESOURCES

Description Impact	2022/23 £'000	2023/24 £'000	2023/25 £'000
<b>Audit</b> Reduction in the budget for external audit support, which offsets the pressure of the creation of an in-house Senior Auditor.	-51		
<b>Revenues</b> Deletion of the bankruptcy budget, which has been consistently underspent.	-11		
<b>Revenues</b> Future expenditure for council tax new burdens support will be partly offset by grants.	-4		
<b>Revenues</b> The annual cost of printing Council tax bills has been below budget in recent years. The proposed saving also reflects a system change that will enable customers to access their accounts and print bills themselves. This will be communicated to residents when the changes have been fully tested and will operate on an “opt in” basis.	-20		
<b>Human Resources</b>  Use of the new collaboration space in Time Square for staff award ceremonies, removing the need for budget to meet external room hire costs.	-2		
<b>Business Improvement District</b> Income will be received for support services provided to the Bracknell BID.	-13		
<b>Revenues</b> Reduction in banking charges reflecting the 2020/21 out-turn position, considering additional gov.uk charges.	-5		
<b>Resources</b> Small reductions in budgets for transport, mileage, public transport etc. to reflect spend in recent years across the Department.	-7		
<b>Organisational Development</b> Reduction in the core training budget, to be supplemented by drawing down from reserves held for training. Use of training budgets is being driven by the results of a recent survey of managers and staff on learning and development needs. In addition, there will be a further £15k reduction in training budgets due to commitments linked to the agreed centralisation of training budgets in 2021/22.	-25		
<b>Resources</b> Reductions in various supplies and services budgets across the Department to reflect spend in recent years.	-17		



Description Impact	2022/23 £'000	2023/24 £'000	2023/25 £'000
<b>Treasury</b> Reduction in supplies and services budgets following a review of services provided by external advisors.	-10		
<b>Council Contracts</b> Review of council wide contracts, and opportunities.	-1		
<b>Audit</b> Creation of in-house Senior Audit Post. The pressure will be accommodated within overall existing budgets as a transfer of function from external to internal resources, the pressure is therefore offset by corresponding saving.	51		
<b>Technical Accountancy</b> Above inflationary Increase in computer software/maintenance & licence costs - Agresso, MHR Pension, PTX/Bottomline. Pressure partly carried forward from previous years when it has been covered by savings in other budgets which are no longer available.	39		
<b>Insurance</b> Cyber insurance is no longer perceived as the most appropriate risk mitigation for the cyber risk. Budget will now be utilised to procure consultancy to assist in developing resilience and response plans.	55		
<b>Revenues</b> Reduction in council tax costs recovered budget to reflect actual sums received.	30		
<b>Devolved Staffing Budget</b> Increasing the devolved staffing budgets (DSB) to reduce the required Managed Vacancy Factor (MVF) to 1% and to address additional pressures as the current budget level is unsustainable.	198		
<b>ADDITIONAL PROPOSALS SINCE DECEMBER</b>			
<b>Revenues</b> Payments of £100 to households in receipt of Council Tax support (households paying council tax on lowest incomes). This will be funded from Covid-19 grant previously transferred into Earmarked Reserves.	320	-320	
<b>Finance</b> An academy conversion will result in lost income for the Finance service.	4		
<b>CENTRAL – RESOURCES TOTAL</b>	<b>531</b>	<b>-320</b>	<b>0</b>

## CENTRAL – PLACE, PLANNING &amp; REGENERATION

Description Impact	2022/23 £'000	2023/24 £'000	2023/25 £'000
<b>Development and Adoptions</b> The costs of street naming and numbering have been met from income received from developers in prior years allowing the maintenance budget to be reduced.	-10		
<b>Place, Planning &amp; Regeneration</b> Various departmental budgets are consistently underspent.	-20		
<b>Town Centre Redevelopment</b> Legacy budget 'Small area plans/TC Strategy' consistently underspent.	-15		
<b>Highways and Transport</b> The new transport model will provide an opportunity for the Council to simply generate outputs for developers, including indications of suitable mitigation work on the highway. This service would be an additional option to the current purchased licenses which enable developers to access and use the model themselves. Indications are that developers would be keen to pay for this specialist service as it would be more efficient.	-50		
<b>Horseshoe Lake</b> Heads of terms agreed on rental fee for use of Horseshoe Lake by the provider. Residual costs to be met for some aspects of building, but the site will return net income from 2022-23.	-10		
<b>The Look Out</b> With Phase One transformation complete, net positive trading, (where the service covers both its cash and non-cash costs) will move a step closer in 2022/2023.  Additional income potentially greater in successive years, subject to Phase Two transformation being completed.	-50	-50	-50
<b>Planning</b> Conservation & Heritage advice is provided by an external specialist consultant, there is insufficient budget to support this advice.  The Council is required to have suitably qualified expertise available in dealing with heritage matters – particularly where they affect statutorily listed heritage assets.	30		
<b>Transport Strategy</b> Above inflation increases to repairs and maintenance costs due to the new traffic signal maintenance contract.	25		

<b>Description Impact</b>	<b>2022/23 £'000</b>	<b>2023/24 £'000</b>	<b>2023/25 £'000</b>
<b>Devolved Staffing Budget</b> Increasing the devolved staffing budgets (DSB) to reduce the required Managed Vacancy Factor (MVF) to 1% and to address additional pressures as the current budget level is unsustainable.	<b>314</b>		
<b>Digital Infrastructure Group</b> Berkshire authorities employ a small team in West Berkshire which is currently only funded until March 2022.	<b>40</b>		
<b>ADDITIONAL PROPOSALS SINCE DECEMBER</b>			
<b>Revenues</b> Her Majesty the Queen celebrates her Platinum Jubilee in 2022 and it is proposed to commemorate this with a programme of events across the Borough, with a key focus on the Lexicon which she visited in October 2018. Full details are still being worked on, with an indicative one-off budget allocation of £0.055m being proposed, to be funded from Earmarked Reserves.	<b>55</b>	<b>-55</b>	
<b>CENTRAL – PLACE, PLANNING &amp; REGENERATION TOTAL</b>	<b>309</b>	<b>-105</b>	<b>-50</b>

## DELIVERY

Description Impact	2022/23 £'000	2023/24 £'000	2023/25 £'000
<b>On / Off Street Parking</b> The income budget for 2021/22 was reduced by this value to recognise the impact of Covid-19 on the amount of income car parking would generate during the year. This saving is reinstating that reduction.	-777		
<b>Committee</b> Ongoing underspends in the Licences & Reprographics budgets.	-2		
<b>Electoral Registration</b> Ongoing underspends in the licences budget and new Electoral Management System contract.	-3		
<b>Members &amp; Mayoralty</b> Ongoing underspends in the Photography, Publicity, Hospitality, Reprographics, Stationery and Publications budgets.	-5		
<b>ICT</b> This saving reflects the reduced resources required to support services and implement new ones following the transfer of these functions to the 'Cloud'.	-90	-90	
<b>Libraries</b> Reduction in the stock fund and deletion of vacant posts.	-84		
<b>Digital Services</b> Reduction in consultancy budget, reflecting that the Website redevelopment will have been completed by 2022/23 and we will have a reduced reliance on specialist expertise to support Drupal developments.	-25		
<b>Asset Review / Corporate Landlord Model</b> Target to reduce costs and increase income from use of operational property assets.	-50		
<b>Health &amp; Safety</b> Deletion of a vacant H&S Adviser role	-8		
<b>Council Contracts</b> Review of council wide contracts, and opportunities.	-41		
<b>Cemetery &amp; Crematorium</b> Budgeted income to be revised to expected forecast level.	50		
<b>ICT</b> As part of the migration of software and support to the cloud several system replacements and upgrades will be necessary and additional software licences purchased in the short term, pending rationalisation of systems and data storage.	265	-150	-150

Description Impact	2022/23 £'000	2023/24 £'000	2023/25 £'000
<b>Home to School Transport</b> Increased cost due to additional number of pupils, transportation to new schools outside of the borough and the cost of single occupancy taxis.	650		
<b>Leisure Contract Management Fee</b> Covid-19 has had a major impact on the opening and attendance at the leisure facilities and these are not expected to fully return to normal during 2022/23. The Management Fee will therefore be reduced by £0.150m and repaid by an additional payment of £0.030m above the agreed contract for 5 years.	150	-180	
<b>Waste Management</b> Due to a national shortage of HGV drivers Suez (the Council's Waste collection contractor) intends to pay a 'Retention and Recruitment' bonus to help alleviate the problem of recruiting and retaining staff, which the Council will part fund.	15		
<b>Devolved Staffing Budget</b> Increasing the devolved staffing budgets (DSB) to reduce the required Managed Vacancy Factor (MVF) to 1% and to address additional pressures as the current budget level is unsustainable.	514		
<b>ADDITIONAL PROPOSALS SINCE DECEMBER</b>			
<b>Borough Greening</b> Additional capital and revenue funding will support the Council's work on 'greening the Borough' through deep cleaning, changes to vegetation, the removal of dead plants, plus the planting of new, hardier plant stock in line with the Council's climate change strategy. The revenue impact is estimated to be £0.025m	25		
<b>DELIVERY TOTAL</b>	<b>584</b>	<b>-420</b>	<b>-150</b>

## PEOPLE

Description Impact	2022/23 £'000	2023/24 £'000	2023/25 £'000
<b>Heathlands nursing home</b> New care home to open in early 2022. The Council will have a contract for 36 of these beds which will be provided at a competitive price.	-193	-14	
<b>Homecare framework contract</b> A new framework contract for homecare services will be established from 1 April. This will include a new flat rate which, whilst ensuring the providers currently paid a lower rate receive an increase, overall should have a beneficial impact on the budget.	-124		
<b>Surplus budgets</b> Based in prior year-outturns, budgets have been reduced where there are recurrent underspends or the action to achieve the saving has already been completed in prior years.	-115		
<b>Lease of properties to registered providers</b> Negotiation of leases of Council-owned properties to registered providers to provide supported housing.	-20		
<b>Automation of business support</b> Recording of conferences	-15		
<b>Income from schools</b> A number of new Service Level Agreements will be offered to schools.	-5		
<b>Council Contracts</b> Review of council wide contracts, and opportunities.	-8		
<b>Adult Social Care Costs</b> This represents the pressure on care packages. It has been calculated by taking current costs. The pressure also includes an estimate of the costs arising from young people turning 18 and transferring into Adult Social Care.	1,664		
<b>Children Looked After</b> This represents the pressure on care and accommodation charges. It has been calculated by taking current costs and estimating changes for the remainder of the financial year, including an anticipated reduction from young people turning 18 and transferring into Adult Social Care.	1,194		
<b>Forestcare</b> Unexpected costs have arisen this year, including increased office rental and ICT costs. In addition, income has reduced due to some contracts not being renewed. These pressures are expected to be for one year only whilst further work is carried out to move this trading account to a sustainable position.	153	-153	

Description Impact	2022/23 £'000	2023/24 £'000	2023/25 £'000
<b>Adults Assistive Equipment and Technology</b> The equipment budget has consistently overspent in prior years due to increased use of equipment to facilitate people with care needs remaining at home. There are likely to be further pressures on the budget in the coming months due to inflation on shipping and material costs.	132		
<b>Schools Budget</b> The Department for Education are reducing by 20% per annum grant support for a range of areas supporting vulnerable pupils, such as education support for children looked after. Additionally, an academy conversion will result in lost income.	71		
<b>Fostering</b> Training for new carers to provide a strong pool of in-house foster carers to support good outcomes for children and young people.	25		
<b>Adoption</b> Cost allocation of the regional adoption service is through an agreed formula based on the proportion of adoptions by each local authority over the previous 3 years.	11		
<b>School Standards Income</b> Income generation has been below target for 3 years and is not expected to increase.	24		
<b>Family Group Conferences</b> An external review has confirmed a strong link from Family Group Conferences and future cost avoidance. There is a long-standing overspending which it is proposed is funded.	24		
<b>Devolved Staffing Budget</b> Increasing the devolved staffing budgets (DSB) to reduce the required Managed Vacancy Factor (MVF) to 1% and to address additional pressures as the current budget level is unsustainable.	1,239		
<b>ADDITIONAL PROPOSALS SINCE DECEMBER</b>			
<b>SEN Team</b> Since March 2021 the SEN Team establishment has been under review and subject to a restructure project. A demand modelling review has taken place to ensure the new structure meets the service demands and needs of the next 3-5 years, however the new structure model will mean an increase in the base budget of this team in the region of £180,000.	180		
<b>PEOPLE TOTAL</b>	<b>4,237</b>	<b>-167</b>	<b>0</b>

## COUNCIL WIDE

Description Impact	2022/23 £'000	2023/24 £'000	2023/25 £'000
<b>Interest</b> Due to cash balances remaining healthy, an underspend on interest payments in the current year is expected to be maintained during 2022/23. The projected saving also includes expected incoming interest from loan notes to the Bracknell Forest Cambium Partnership (the property Joint Venture between the Council and Countryside Properties) reflecting both the Coopers Hill site value and the Councils contribution to development costs.	-400		
<b>Essential Car Users</b> Review of essential car users across the Council.	-20	-30	
<b>ADDITIONAL PROPOSALS SINCE DECEMBER</b>			
<b>Earmarked Reserves</b> Transfers from Earmarked Reserves to fund a £100 reduction in Council tax bills for households in receipt of Council Tax support in 2022/23 (-£0.320m) and the Queen's Platinum Jubilee celebrations (-£0.055m)	-375	375	
<b>COUNCIL WIDE TOTAL</b>	<b>-795</b>	<b>345</b>	<b>0</b>



## TREASURY MANAGEMENT REPORT

- 1.1 The Local Government Act 2003 requires the Council to “have regard to” the Prudential Code and to set Prudential Indicators for the next three years to ensure that the Council’s capital investment plans are affordable, prudent and sustainable.
- 1.2 The Council is required to operate a balanced budget, which broadly means that cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties or instruments commensurate with the Council’s low risk appetite, providing adequate liquidity initially before considering investment return.
- 1.3 The second main function of the treasury management service is the funding of the Council’s capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer-term cash flow planning, to ensure that the Council can meet its capital spending obligations. This management of longer-term cash may involve arranging long or short-term loans, or using longer-term cash flow surpluses. On occasion, when it is prudent and economic, any debt previously drawn may be restructured to meet Council risk or cost objectives.
- 1.4 The contribution the treasury management function makes to the authority is critical, as the balance of debt and investment operations ensure liquidity or the ability to meet spending commitments as they fall due, either on day-to-day revenue or for larger capital projects. The treasury operations will see a balance of the interest costs of debt and the investment income arising from cash deposits affecting the available budget. Since cash balances generally result from reserves and balances, it is paramount to ensure adequate security of the sums invested, as a loss of principal will in effect result in a loss to the General Fund Balance.
- 1.5 CIPFA defines treasury management as:

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

### Capital Strategy

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

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

The Council published its Capital Strategy in 2019. It has been reviewed by officers and will be updated for 2022/23 to be reviewed by Governance and Audit Committee before being published. If any non-treasury investment sustains a loss during the final accounts and audit process, the strategy and revenue implications will be reported through the same procedure as the capital strategy.

### Treasury Management reporting

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

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

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

1.7 There are no substantial changes to the Treasury Strategy to be adopted in 2022/23. CIPFA's proposed changes to the Prudential Code have sparked a great deal of debate in the local government sector, with the Local Government Association requesting that their introduction be held back, pending further clarifications being formally issued. As a consequence, the proposed changes, particularly those potentially impacting on existing commercial property holdings, are not yet cast in the Code as it currently stands. The Council is, however, complying with proposed new requirement to split the Capital Financing Requirement into assets held for service purposes and others held for investment purposes, which is purely presentational and adds transparency.

1.8 The Treasury Management Strategy for 2022/23 covers two main areas:

#### **Capital issues**

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

#### **Treasury management issues**

- the current treasury position;
- treasury indicators which limit the treasury risk and activities of the Council;
- prospects for interest rates;
- the borrowing strategy;
- policy on borrowing in advance of need;
- debt rescheduling;
- the investment strategy;
- creditworthiness policy; and

- the policy on use of external service providers.

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

## The Capital Prudential Indicators 2022/23 – 2024/25

The Local Government Act 2003 requires the Council to adopt the CIPFA Prudential Code and produce prudential indicators. Each indicator either summarises the expected capital activity or introduces limits upon that activity and reflects the outcome of the Council's underlying capital appraisal systems. Within this overall prudential framework there is an impact on the Council's treasury management activity – as it will directly impact on borrowing or investment activity and as such the Treasury Management Strategy for 2022/23 to 2024/25 complements these indicators.

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

### The Capital Expenditure Plans

The Council's capital expenditure plans are summarised below, and this forms the first of the prudential indicators. A certain level of capital expenditure is grant supported by the Government; any decisions by the Council to spend above this level will be considered unsupported capital expenditure. This capital expenditure needs to have regard to:

- Service objectives (e.g. strategic planning);
- Stewardship of assets (e.g. asset management planning);
- Value for money (e.g. option appraisal);
- Prudence and sustainability (e.g. implications for external borrowing and whole life costing);
- Affordability (e.g. implications for the council tax);
- Practicality (e.g. the achievability of the forward plan).

The revenue consequences of capital expenditure, particularly the unsupported capital expenditure, will need to be paid for from the Council's own resources. This capital expenditure can be paid for immediately (by applying capital resources such as capital receipts, capital grants, or revenue resources), but if these resources are insufficient any residual capital expenditure will add to the Council's borrowing need.

The key risks to the plans are that the level of Government support has been estimated and is therefore maybe subject to change. Similarly some estimates for other sources of funding, such as capital receipts, may also be subject to change over this timescale. For instance anticipated asset sales may be postponed due to external factors such as the impact of the wider economy.

The Council is asked to approve the summary capital expenditure projections below and to note the out-turn position reported to the Executive and approved on the 25th August 2020.

<b>Capital Expenditure</b>	<b>2022/23 Estimate £000</b>	<b>2023/24 Estimate £000</b>	<b>2024/25 Estimate £000</b>
Capital Expenditure	16,311	7,231	4,767
Commercial Activities	0	0	0
<b>Financed by:</b>			
Capital receipts	3,250	3,000	3,000
Capital grants & Contributions	7,037	2,820	2,340
<b>Net financing need for the year</b>	<b>6,024</b>	<b>1,411</b>	<b>-573</b>

### **The Council's Borrowing Need (the Capital Financing Requirement)**

The second prudential indicator is the Council's Capital Financing Requirement (CFR). The CFR is simply the total outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Council's underlying borrowing need. The capital expenditure above which has not immediately been paid for will increase the CFR. Due to the nature of some of the capital expenditure identified above (ie grant), an element will be immediately impaired or will not qualify as capital expenditure for CFR purposes. As such the net financing figure above may differ from that used in the CFR calculation. The CFR does not increase indefinitely, as the minimum revenue provision (MRP) is a statutory annual revenue charge which broadly reduces the indebtedness in line with each assets life, and so charges the economic consumption of capital assets as they are used.

The Council is required to pay off an element of the accumulated General Fund capital spend each year through a revenue charge (the Minimum Revenue Provision - MRP), although it is also allowed to undertake additional voluntary payments (VRP). No additional voluntary payments are planned.

## Annex E(i)

The Council is asked to approve the CFR projections below:

£m		2020/21	2021/22 Estimate	2022/23 Estimate	2023/24 Estimate
<b>Capital Financing Requirement</b>					
CFR – services		128,975	141,099	149,395	153,707
CFR - Commercial activities/ non-financial investments		<b>85,627</b>	<b>85,115</b>	<b>84,591</b>	<b>84,055</b>
<b>Total CFR</b>		214,602	226,214	233,986	237,762
<b>Movement in CFR</b>		<b>3,013</b>	<b>11,612</b>	<b>7,772</b>	<b>3,776</b>

<b>Movement in CFR represented by</b>					
Net financing need for the year (above)		680	9,186	5,220	804
Less MRP/VRP and other financing movements		2,333	2,426	2,552	2,972
<b>Movement in CFR</b>		<b>3,013</b>	<b>11,612</b>	<b>7,772</b>	<b>3,776</b>

<b>MRP Analysis</b>					
MRP		1,365	1,458	1,718	1,929
VRP		501	512	524	536
Other Financing Repayments		467	456	310	507
<b>MRP</b>		<b>2,333</b>	<b>2,426</b>	<b>2,552</b>	<b>2,998</b>

CLG Regulations have been issued which require full Council to approve an MRP Statement in advance of each year. The Council is recommended to approve the MRP Statement attached in Annex E(ii)

### **Minimum Revenue Provision (MRP) Policy Statement**

The concept of the Minimum Revenue Provision (MRP) was introduced when the Local Government Capital Finance System was changed on 1 April 1990. This required local authorities to assess their outstanding debt and to pay off an element of the accumulated General Fund capital spend each year (the CFR) through a revenue charge (MRP)

Department for Local Government & Communities (DCLG) issued regulations in 2008 which require a local authority to calculate for the current financial year an amount of MRP which it considers “prudent”. The broad aim of a prudent provision is to ensure that debt is repaid over a period that is reasonably commensurate with that over which the capital expenditure provides benefits or in the case of borrowing supported by government, reasonably commensurate with the period implicit in the determination of the grant. The Council can choose to charge more than the minimum.

Further statutory guidance on MRP was issued by Government on 2 February 2018, which largely becomes effective from 1 April 2019. The exception related to the section allowing local authorities to change their approach to calculating MRP at any time, which took effect immediately. A key part of the updated guidance clarified that the duty to make MRP extends to investment properties where their acquisition has been partially or fully funded by an increase in borrowing or credit arrangements.

In order to minimise the impact on the revenue budget whilst ensuring that prudent provision is made for repayment of borrowing, the Council moved from the equal instalments method to the annuity method in calculating the annual charge over the estimated life of the asset from 1st April 2017. A variety of options are provided to councils under the regulations and guidance, so long as there is a prudent provision. Having sought advice from Counsel on permissible approaches following the revised guidance, the Executive Director:Resources recommends that Council approves the following MRP Statement.

- For capital expenditure incurred before 1 April 2008 or which in the future will be Supported Capital Expenditure, the MRP policy will be:

**Based on CFR** – MRP will be based on the CFR. This option provides for an approximate 4% reduction in the borrowing need (CFR) each year.

- From 1 April 2008 for all unsupported borrowing (including PFI and finance leases but excluding CPIS expenditure) the MRP policy will be:

**Asset life method** - MRP will be based on the annuity basis, in accordance with the regulations. Repayments included in annual PFI or finance leases are applied as MRP.

- For assets purchased under the Commercial Property Investment Strategy (CPIS) the MRP policy will be:

**Partial deferral method** – MRP will be charged at 10% of the property value over a 15 year period to reflect a realistic level of value risk, on the basis that the properties will typically be held for a period of no greater than around 10 to 20 years.

- For all other capital expenditure funded from borrowing where there is an intention to repay the borrowing from future related receipts (including loans to companies wholly or partly owned by the Council) and there is a strong likelihood that this will happen, the MRP policy will be:

**Deferral method** - MRP will be deferred and the liability repaid through future capital receipts from disposing of the asset or loan repayments from third parties

There will be a presumption that capital receipts will be allocated to the appropriate assets in relation to the constraints of the medium term financial strategy.

The actual charge made in the year will be based on applying the above policy to the previous year's actual capital expenditure and funding decisions. Therefore the 2022/23 charge will be based on 2021/22 capital out-turn.

### **MRP Overpayments**

A change introduced by the revised MHCLG MRP Guidance was the allowance that any charges made over the statutory minimum revenue provision (MRP), voluntary revenue provision or overpayments, can, if needed, be reclaimed in later years if deemed necessary or prudent. In order for these sums to be reclaimed for use in the budget, this policy must disclose the cumulative overpayment made each year. Up until the 31 March 2021 the total VRP overpayments are expected to be £1.502m.



## TREASURY MANAGEMENT STRATEGY STATEMENT

The Treasury Management service is an important part of the overall financial management of the Council's affairs. The prudential indicators in Annex E(i) consider the affordability and impact of capital expenditure decisions, and set out the Council's overall capital framework. The Treasury Management service considers the effective funding of these decisions. Together they form part of the process which ensures the Council meets its balanced budget requirement under the Local Government Finance Act 1992.

The Council's treasury activities are strictly regulated by statutory requirements and a professional code of practice - 2011 revised CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes ("the CIPFA TM Code"). This Council has adopted the revised Code.

As a result of adopting the Code the Council also adopted a Treasury Policy Statement. This adoption is the requirement of one of the prudential indicators.

The Code of Practice requires an annual strategy to be reported to Council outlining the expected treasury activity for the forthcoming 3 years. A key requirement of this report is to explain both the risks, and the management of the risks, associated with the treasury service. A further treasury report is produced after the year-end to report on actual activity for the year, and a new requirement of the revision of the Code of Practice is that there is a mid-year monitoring report.

This strategy covers:

- The Council's debt and investment projections;
- The Council's estimates and limits on future debt levels;
- The expected movement in interest rates;
- The Council's borrowing and investment strategies;
- Treasury performance indicators;
- Specific limits on treasury activities;

### **Debt and Investment Projections 2022/23 – 2024/25**

The borrowing requirement comprises the expected movement in the CFR and any maturing debt which will need to be re-financed.

	<b>2022/23 Estimated</b>	<b>2023/24 Estimated</b>	<b>2024/25 Estimated</b>
<b>External Debt</b>			
Debt at 31 March	£100m	£110m	£115m
<b>Investments</b>			
Investments at 31 March	£15m	£10m	£10m

### Current Portfolio

The overall treasury management portfolio as at 31 March 2021 and for the position as at 31<sup>st</sup> October 2021 are shown below for both borrowing and investments

	Actual	Actual	Current	Current
	31/03/21	31/03/21	31/12/21	31/10/21
<b>Treasury Investments</b>	£000	%	£000	%
Money Market Funds	20,244	100	42,238	100
<b>External Borrowing</b>	£000	%	£000	%
Local Authorities	0	0	0	0
PWLB	80,000	100	80,000	100
<b>Net Treasury Borrowing</b>	59,756			

### Limits to Borrowing Activity

Within the prudential indicators there are a number of key indicators to ensure the Council operates its activities within well defined limits. For the first of these the Council needs to ensure that its total borrowing net of any investments, does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for 2021/22 and the following two financial years. This allows some flexibility for limited early borrowing for future years but ensures that borrowing is not undertaken for revenue purposes.

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

### The Authorised Limit for External Debt

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

This is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all councils' plans, or those of a specific council, although no control has yet been exercised.

The Council is asked to approve the following Authorised Limit:

Authorised limit	2022/23 Estimate	2023/24 Estimate	2024/25 Estimate
Borrowing	£220m	£225m	£230m
Other long term liabilities	£20m	£20m	£20m
Total	£240m	£245m	£250m

### Operational Boundary for External Debt

The Authority is also recommended to approve the Operational Boundary for external debt for the same period. The proposed Operational Boundary is based on the same

estimates as the Authorised Limit but reflects directly the estimate of the most likely but not worst case scenario, without the additional headroom included within the Authorised Limit to allow for unusual cash movements.

Operational Boundary	2022/23 Estimate	2023/24 Estimate	2024/25 Estimate
Borrowing	£225m	£230m	£235m
Other long term liabilities	£20m	£20m	£20m
Total	£245m	£250m	£255m

### Borrowing in advance of need.

The Executive Director:Resources may do this under delegated power where, for instance, a sharp rise in interest rates is expected, and so borrowing early at fixed interest rates will be economically beneficial or meet budgetary constraints. Whilst the Executive Director:Resources will adopt a cautious approach to any such borrowing, where there is a clear business case for doing so borrowing may be undertaken to fund the approved capital programme or to fund future debt maturities. Risks associated with any advance borrowing activity will be subject to appraisal in advance and subsequent reporting through the mid-year or annual reporting mechanism.

### Expected Movement in Interest Rates

The Council's treasury advisor, Link Asset Services has provided the following forecast:

Link Group Interest Rate View 8.11.21														
	Dec-21	Mar-22	Jun-22	Sep-22	Dec-22	Mar-23	Jun-23	Sep-23	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25
BANK RATE	0.25	0.25	0.50	0.50	0.50	0.75	0.75	0.75	0.75	1.00	1.00	1.00	1.00	1.25
3 month ave earnings	0.30	0.40	0.50	0.50	0.50	0.60	0.80	0.90	1.00	1.00	1.00	1.00	1.00	1.00
6 month ave earnings	0.40	0.50	0.60	0.60	0.70	0.80	0.90	1.00	1.10	1.10	1.10	1.10	1.10	1.10
12 month ave earnings	0.50	0.60	0.70	0.70	0.80	0.90	1.00	1.10	1.20	1.20	1.20	1.20	1.20	1.20
5 yr PWLB	1.50	1.50	1.60	1.60	1.70	1.70	1.70	1.80	1.80	1.80	1.90	1.90	2.00	2.00
10 yr PWLB	1.80	1.90	1.90	2.00	2.00	2.10	2.10	2.20	2.20	2.20	2.30	2.30	2.30	2.40
25 yr PWLB	2.10	2.20	2.30	2.40	2.40	2.40	2.50	2.50	2.60	2.60	2.60	2.60	2.70	2.70
50 yr PWLB	1.90	2.00	2.10	2.20	2.20	2.20	2.30	2.30	2.40	2.40	2.40	2.40	2.50	2.50

The coronavirus outbreak has done huge economic damage to the UK and to economies around the world. After the Bank of England took emergency action in March 2020 to cut Bank Rate to 0.10%, it left Bank Rate unchanged at its subsequent meetings until raising it to 0.25% at its meeting on 16th December 2021. Economies continue to re-open, while governments have either commenced or are contemplating dialling down emergency fiscal support mechanisms.

For the UK, fiscal policy tightening has already been put in place. On the monetary policy front, matters are more complex, with price pressures on the rise and expected to remain elevated into 2022/23, while economic recoveries are seemingly losing momentum heading into the latter stages of 2021/22. Markets are unsettled, with asset prices coming under pressure following their largesse gains made in the formative stages of recovery. The forecast for Bank Rate now includes four

increases, one in quarter 2 of 2022 to 0.50%, quarter 1 of 2023 to 0.75%, quarter 1 of 2024 to 1.00% and, finally, one in quarter 1 of 2025 to 1.25%.

Vaccines were the game changer during 2021 which raised high hopes that life in the UK would be able to largely return to normal in the second half of the year. However, the Omicron mutation at the end of November changed the landscape again. Rather than go for full lockdowns which heavily damage the economy, the government strategy this time is focusing on getting as many people as possible to have a third (booster) vaccination after three months from the previous last injection, as a booster has been shown to restore a high percentage of immunity to Omicron to those who have had two vaccinations.

With the household saving rate having been exceptionally high since the first lockdown in March 2020, there is plenty of pent-up demand and purchasing power stored up for services in sectors like restaurants, travel, tourism and hotels which had been hit hard during 2021 but now looks likely to be hit hard again by either, or both, of government restrictions and/or consumer reluctance to leave home. The economy, therefore, faces significant headwinds although some sectors have learned how to cope well with Covid.

#### **Investment and borrowing rates**

- **Investment returns** are expected to improve in 2022/23. However, while markets are pricing in a series of Bank Rate hikes, actual economic circumstances may see the MPC fall short of these elevated expectations.
- **Borrowing interest rates** fell to historically very low rates as a result of the COVID crisis and the quantitative easing operations of the Bank of England and still remain at historically low levels. The policy of avoiding new borrowing by running down spare cash balances has served local authorities well over the last few years.

#### **Borrowing Strategy 2022/23**

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

Against this background and the risks within the economic forecast, caution will be adopted with the 2022/23 treasury operations. The Executive Director:Resources will monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances:

- if it was felt that there was a significant risk of a sharp FALL in long and short term rates (e.g. due to a marked increase of risks around relapse into recession as a result of COVID or other economic risks), then any long term borrowings will be postponed, and potential rescheduling from fixed rate funding into short term borrowing will be considered.
- if it was felt that there was a significant risk of a much sharper RISE in long and short term rates than that currently forecast, perhaps arising from an acceleration in the start date and in the rate of increase in central rates in the USA and UK, an increase in world economic activity or a sudden increase in inflation risks, then the portfolio position will be re-appraised. Most likely, fixed

rate funding will be drawn whilst interest rates are lower than they are projected to be in the next few years.

Any decisions will be reported to the Executive at the next available opportunity.

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

### **Debt rescheduling**

As short-term borrowing rates will be considerably cheaper than longer term fixed interest rates, there may be potential opportunities to generate savings by switching from long-term debt to short-term debt. However, these savings will need to be considered in the light of the current treasury position and the size of the cost of debt repayment (premiums incurred).

The reasons for any rescheduling to take place will include:

- the generation of cash savings and / or discounted cash flow savings;
- helping to fulfil the treasury strategy;
- enhance the balance of the portfolio (amend the maturity profile and/or the balance of volatility).

Consideration will also be given to identify if there is any residual potential for making savings by running down investment balances to repay debt prematurely as short term rates on investments are likely to be lower than rates paid on current debt.

All rescheduling will be reported to the Executive, at the earliest meeting following its action.

## Investment Strategy 2022/23 – 2024/25

### Investment Policy

The Ministry of Housing, Communities and Local Government (MHCLG) and CIPFA have extended the meaning of ‘investments’ to include both financial and non-financial investments. This report deals solely with financial investments, (as managed by the treasury management team). Non-financial investments, essentially the purchase of income yielding assets, are covered in the Capital Strategy.

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

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

The Council’s investment priorities will be security first, portfolio liquidity second and then yield, (return).

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

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

6. This authority has engaged external consultants, (see paragraph 1.5), to provide expert advice on how to optimise an appropriate balance of security, liquidity and yield, given the risk appetite of this authority in the context of the expected level of cash balances and need for liquidity throughout the year.
7. All investments will be denominated in sterling.

### **Creditworthiness policy**

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

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

This modelling approach combines credit ratings, credit watches and credit outlooks in a weighted scoring system which is then combined with an overlay of CDS spreads for which the end product is a series of colour coded bands which indicate the relative creditworthiness of counterparties. These colour codes are used by the Council to determine the suggested duration for investments. The Council will therefore use counterparties within the following maturities .

Dark pink	5 years for Enhanced money market funds (EMMFs) with a credit score of 1.25
Light pink	5 years for Enhanced money market funds (EMMFs) with a credit score of 1.5
Blue	1 year (only applies to nationalised or semi nationalised UK Banks)
Orange	1 year
Red	6 months
Green	100 days
No colour	not to be used

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

	Colour (and long term rating where applicable)	Money and/or % Limit	Time Limit
Banks	orange	£7m	1 yr
Banks – part nationalised	blue	£7m	1 yr
Banks	red	£7m	6 months
Banks	green	£7m	100 days
Banks	No colour	£0m	0 days
Debt Management Account Deposit Facility	AAA	£10m	6 months
Local authorities	n/a	£7m	1 yr
Money Market Funds (CNAV, LVNAV & VNAV)	AAA	£10m	liquid
Enhanced money market funds with a credit score of 1.25	Dark pink / AAA	£10m	liquid
Enhanced money market funds with a credit score of 1.5	Light pink / AAA	£10m	liquid

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

Typically the minimum credit ratings criteria the Council use will be a short term rating (Fitch or equivalents) of short term rating F1, long term rating A-, viability rating of A-, and a support rating of 1. There may be occasions when the counterparty ratings from one rating agency are marginally lower than these ratings but may still be used. In these instances consideration will be given to the whole range of ratings available, or other topical market information, to support their use.

All credit ratings will be monitored in real time. The Council is alerted to changes to ratings of all three agencies through its use of our creditworthiness service.

- if a downgrade results in the counterparty / investment scheme no longer meeting the Council's minimum criteria, its further use as a new investment will be withdrawn immediately.
- in addition to the use of credit ratings the Council will be advised of information in movements in credit default swap spreads against the iTraxx benchmark and other market data on a weekly basis. Extreme market movements may result in downgrade of an institution or removal from the Council's lending list.



Sole reliance will not be placed on the use of this external service. In addition this Council will also use market data and market information, information on government support for banks and the credit ratings of that supporting government

In the normal course of the council's cash flow operations it is expected that both Specified and Non-specified investments will be utilised for the control of liquidity as both categories allow for short term investments.

The use of longer term instruments (greater than one year from inception to repayment) will fall in the Non-specified investment category. These instruments will only be used where the Council's liquidity requirements are safeguarded however the current investment limits for 2021/22 restrain all investments to less than 1 year. Any amendment to this strategy will require the credit-criteria to be amended to include a long-term rating. This will be addressed through the formal approval by Council of a revised Treasury Management Strategy and Annual Investment Strategy.

### **Country and Sector Considerations**

Due care will be taken to consider the country, group and sector exposure of the Council's investments. The current investment strategy limits all investments to UK Banks, Building Societies and Local Authorities, in addition to Sterling denominated AAA Money Market Funds.

### **Economic Investment Considerations**

Investments will be made with reference to the core balance and cash flow requirements and the outlook for short-term interest rates. The criteria for choosing counterparties set out above provides a sound approach to investment in "normal" market circumstances. Whilst Members are asked to approve this base criteria above, under the exceptional current market conditions the Borough Treasurer may temporarily restrict further investment activity to those counterparties considered of higher credit quality than the minimum criteria set out for approval. These restrictions will remain in place until the banking system returns to "normal" conditions. Similarly the time periods for investments will be restricted.

Examples of these restrictions would be the greater use of the Debt Management Deposit Account Facility (a Government body which accepts local authority deposits), Money Market Funds, and strongly rated institutions. The credit criteria have been amended to reflect these facilities.

### **Sensitivity to Interest Rate Movements**

Future Council accounts will be required to disclose the impact of risks on the Council's treasury management activity. Whilst most of the risks facing the treasury management service are addressed elsewhere in this report (credit risk, liquidity risk, market risk, maturity profile risk), the impact of interest rate risk is discussed but not quantified. The table below highlights the estimated impact of a 1% change in interest rates to the estimated treasury management costs for next year. However as all borrowing is fixed any increase in rates will only impact on new borrowing.

	<b>2022/23 Estimated + 1%</b>	<b>2022/23 Estimated - 1%</b>
<b>Revenue Budgets</b>	<b>£'000</b>	<b>£'000</b>
Borrowing costs	200	200

### Treasury Management Limits on Activity

There are four further treasury activity limits, which were previously prudential indicators. The purpose of these are to contain the activity of the treasury function within certain limits, thereby managing risk and reducing the impact of an adverse movement in interest rates. However if these are set to be too restrictive they will impair the opportunities to reduce costs/improve performance. The indicators are:

Upper limits on variable interest rate exposure – This identifies a maximum limit for variable interest rates based upon the debt position net of investments

Upper limits on fixed interest rate exposure – Similar to the previous indicator this covers a maximum limit on fixed interest rates.

Maturity structures of borrowing – These gross limits are set to reduce the Council's exposure to large fixed rate sums falling due for refinancing, and are required for upper and lower limits.

Total principal funds invested for greater than 364 days – These limits are set with regard to the Council's liquidity requirements and are based on the availability of funds after each year-end.

The Council is asked to approve the limits:

	2022/23	2023/24	2024/25
<b>Interest rate Exposures</b>			
	<b>Upper</b>	<b>Upper</b>	<b>Upper</b>
<b>Limits on fixed interest rates based on net debt</b>	£245m	£250m	£255m
<b>Limits on variable interest rates based on net debt</b>	£245m	£250m	£255m
<b>Maturity Structure of fixed interest rate borrowing 2017/18</b>			
		<b>Lower</b>	<b>Upper</b>
Under 12 months		0%	100%
12 months to 2 years		0%	100%
2 years to 5 years		0%	100%
5 years to 10 years		0%	100%
10 years and above		0%	100%
<b>Maximum principal sums invested &gt; 364 days</b>			
Principal sums invested > 364 days	£m	£m	£m
	0	0	0

### Performance Indicators

The Code of Practice on Treasury Management requires the Council to set performance indicators to assess the adequacy of the treasury function over the year. These are distinct historic indicators, as opposed to the prudential indicators, which are predominantly forward looking. For 2022/23 the relevant benchmark will relate only to investments and will be the "7 Day LIBID Rate" – however the calculation of LIBID and LIBOR are to be retired by the Bank of England – and a new benchmark based on PWLB and Gilts will need to be agreed upon for 2022/23. The results of these indicators will be reported in the Treasury Annual Report.

### Treasury Management Advisers

The Council uses Link Asset Services as its treasury management consultants. The Council recognises that responsibility for treasury management decision remains with

the organisation at all times and will ensure that undue reliance is not placed upon our external service providers.

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

**Member and Officer Training**

The increased Member consideration of treasury management matters and the need to ensure officers dealing with treasury management are trained and kept up to date requires a suitable training process for Members and officers. Following the nomination of the Governance and Audit Committee to examine and assess the effectiveness of the Treasury Management Strategy and Policies, initial training was provided and additional training has been undertaken as necessary. Officer training is carried out in accordance with best practice and outlined in TMP 10 Training and Qualifications to ensure that all staff involved in the Treasury Management function are fully equipped to undertake the duties and responsibilities allocated to them

**SPECIFIED INVESTMENTS**

*All investments listed below must be sterling-denominated.*

Investment	Share/ Loan Capital?	Repayable/ Redeemable within 12 months?	Security / Minimum Credit Rating **	Circumstance of use	Maximum period
<b>Debt Management Agency Deposit Facility*</b> (DMADF) * this facility is at present available for investments up to 6 months	No	Yes	Govt-backed	In-house	364 Days
<b>Term deposits</b> with the UK government or with Local Authority (including Parish Councils) in England, Wales, Scotland or Northern Ireland with maturities up to 364 Days	No	Yes	High security although LAs not credit rated.	In-house and by external fund managers subject to the guidelines and parameters agreed with them	364 Days
<b>Term deposits</b> with credit-rated deposit takers (banks and building societies), including callable deposits, with maturities up to 364 Days	No	Yes	<i>As per list of approved Counterparties</i>	In-house and by external fund managers subject to the guidelines and parameters agreed with them	364 Days
<b>Certificates of Deposit</b> issued by credit-rated deposit takers (banks and building societies) : up to 364 Days.  <i>Custodial arrangement required prior to purchase</i>	No	Yes	<i>As per list of approved Counterparties</i>	To be used by external fund managers only subject to the guidelines and parameters agreed with them	364 Days
<b>Gilts</b> : up to 364 Days	No	Yes	Govt-backed	To be used by external fund managers only subject to the guidelines and parameters agreed with them	364 Days

Investment	Share/ Loan Capital?	Repayable/ Redeemable within 12 months?	Security / Minimum Credit Rating **	Circumstance of use	Maximum period
<b>Money Market Funds</b> CNAV, LVNAV, and VNAV <i>These funds do not have any maturity date</i>	No	Yes	<i>AAA Rating by Fitch, Moodys or S&amp;P</i>	In-house and by external fund managers subject to the guidelines and parameters agreed with them	The period of investment may not be determined at the outset but would be subject to cash flow and liquidity requirements
<b>Forward deals</b> with credit rated banks and building societies < 1 year (i.e. negotiated deal period plus period of deposit)	No	Yes	<i>As per list of approved Counterparties</i>	In-house and by external fund managers subject to the guidelines and parameters agreed with them. Tracking of all forward deals to be undertaken and recorded.	1 year in aggregate
<b>Commercial paper</b> <i>[short-term obligations (generally with a maximum life of 9 months) which are issued by banks, corporations and other issuers]</i>  <i>Custodial arrangement required prior to purchase</i>	No	Yes	<i>As per list of approved Counterparties</i>	To be used by external fund managers only subject to the guidelines and parameters agreed with them	9 months
<b>Treasury bills</b> <i>[Government debt security with a maturity less than one year and issued through a competitive bidding process at a discount to par value] Custodial arrangement required prior to purchase</i>	No	Yes	Govt-backed	To be used by external fund managers only subject to the guidelines and parameters agreed with them	1 year

## NON-SPECIFIED INVESTMENTS

**All investments listed below must be sterling-denominated.**

<u>Investment</u>	<u>(A) Why use it?</u> <u>(B) Associated risks?</u>	<u>Share/</u> <u>Loan</u> <u>Capital?</u>	<u>Repayable/</u> <u>Redeemable</u> <u>within 12</u> <u>months?</u>	<u>Security /</u> <u>Minimum credit</u> <u>rating **</u>	<u>Circumstance of</u> <u>use</u>	<u>Maximum</u> <u>maturity of</u> <u>investment</u>
Deposits with Authority's Banker where credit rating has dropped below minimum criteria	Where the Council's bank no longer meets the high credit rating criteria set out in the Investment Strategy the Council has little alternative but to continue using them, and in some instances it may be necessary to place deposits with them, these deposits should be of a very short duration thus limiting the Council to daylight exposure only (i.e. flow of funds in and out during the day, or overnight exposure).	No	Yes	n/a	In-House	364 Days
<b>Term deposits</b> with credit rated deposit takers (banks and building societies) with maturities greater than 1 year	(A) (i) Certainty of rate of return over period invested. (ii) No movement in capital value of deposit despite changes in interest rate environment. (B) (i) Illiquid : as a general rule, cannot be traded or repaid prior to maturity. (ii) Return will be lower if interest rates rise after making the investment. (iii) Credit risk : potential for greater deterioration in credit quality over longer period	No	No	<i>As per list of approved Counterparties</i>	In-house and by external fund managers subject to the guidelines and parameters agreed with them	5 Years
<b>Certificates of Deposit</b> with credit rated deposit takers (banks and building societies) with maturities greater than 1 year <i>Custodial arrangement required prior to purchase</i>	(A) (i) Although in theory tradable, are relatively illiquid. (B) (i) 'Market or interest rate risk' : Yield subject to movement during life of CD which could negatively impact on price of the CD.	No	Yes	<i>As per list of approved Counterparties</i>	To be used by external fund managers only subject to the guidelines and parameters agreed with them	5 years

<u>Investment</u>	<u>(A) Why use it?</u> <u>(B) Associated risks?</u>	<u>Share/ Loan Capital?</u>	<u>Repayable/ Redeemable within 12 months?</u>	<u>Security / Minimum Credit Rating?</u>	<u>Circumstance of use</u>	<u>Maximum maturity of investment</u>
<b>Callable deposits</b> with credit rated deposit takers (banks and building societies) with maturities greater than 1 year	(A) (i) Enhanced income ~ Potentially higher return than using a term deposit with similar maturity.  (B) (i) Illiquid – only borrower has the right to pay back deposit; the lender does not have a similar call. (ii) period over which investment will actually be held is not known at the outset. (iii) Interest rate risk : borrower will not pay back deposit if interest rates rise after deposit is made.	No	No	<i>As per list of approved Counterparties</i>	In-house and by external fund managers subject to the guidelines and parameters agreed with them	<i>5 years</i>
<b>UK government gilts</b> with maturities in excess of 1 year  <i>Custodial arrangement required prior to purchase</i>	(A) (i) Excellent credit quality. (ii) Very Liquid. (iii) If held to maturity, known yield (rate of return) per annum ~ aids forward planning. (iv) If traded, potential for capital gain through appreciation in value (i.e. sold before maturity) (v) No currency risk  (B) (i) 'Market or interest rate risk' : Yield subject to movement during life of sovereign bond which could negatively impact on price of the bond i.e. potential for capital loss.	No	Yes	Govt backed	To be used by external fund managers only subject to the guidelines and parameters agreed with them	<i>10 years including but also including the 10 year benchmark gilt</i>

<b>Investment</b>	<b>(A) Why use it? (B) Associated risks?</b>	<b>Share/ Loan Capital?</b>	<b>Repayable/ Redeemable within 12 months?</b>	<b>Security / Minimum credit rating **</b>	<b>Circumstance of use</b>	<b>Maximum maturity of investment</b>
<b>Forward deposits</b> with credit rated banks and building societies for periods > 1 year (i.e. negotiated deal period plus period of deposit)	(A) (i) Known rate of return over period the monies are invested ~ aids forward planning.  (B) (i) Credit risk is over the whole period, not just when monies are actually invested. (ii) Cannot renege on making the investment if credit rating falls or interest rates rise in the interim period.	No	No	<i>As per list of approved Counterparties</i>	In-house and by external fund managers subject to the guidelines and parameters agreed with them. Tracking of all forward deals to be undertaken and recorded.	<i>5 years</i>
<b>Deposits with unrated deposit takers (banks and building societies) but with unconditional financial guarantee from HMG or credit-rated parent institution</b> : any maturity	(A) Credit standing of parent will determine ultimate extent of credit risk	No	Yes	<i>As per list of approved Counterparties</i>	In-house and by external fund managers subject to the guidelines and parameters agreed with them	<i>1 year</i>



## Reserves & Balances Policy Statement

As part of the financial planning process the Council will consider the establishment and maintenance of reserves and balances. In setting these, account is taken of the key assumptions underpinning the budget and financial strategy, together with the Council's financial management arrangements. Key factors considered include;

- Cash flow
- Assumptions on inflation and interest rates
- Level and timing of capital receipts
- Demand led pressures
- Planned economies
- Risk associated with major projects
- Availability of other funding (e.g. insurance)
- General financial climate

Reserves and Balances can be held for a number of purposes

### General Balances

Balance	Purpose	Policy	Value
<b>General Fund</b>	Provides general contingency for unavoidable or unforeseen expenditure and to cushion against uneven cash flows and provides stability in longer term financial planning.	Policy based on a risk assessment of budget and medium term financial plans. Historically £4m has been considered to be the minimum prudent level, though this needs to be kept under review as risks change.	March 19 £9.060m March 20 £7.091m March 21 £10.327m March 22 £10.326m March 23 £9.551m

**Earmarked Reserves**

Earmarked Reserves are sums of money which have been set aside for specific purposes. These are excluded from general balances available to support revenue or capital expenditure. The Council has the following earmarked reserves:

<b>Reserve</b>	<b>Purpose</b>	<b>Policy</b>	<b>Value</b>
<b>Insurance and other Uninsured Claims</b>	This provides cover for the excess payable on claims under the Council's insurance policies (self- insurance). It also provides for any potential future claims not covered by existing policies, including contractual disputes and legal claims, and provision for self- insurance for fidelity cover.	Needs to be at a level where the provision could sustain claims in excess of current claims history	March 19 £2.952m March 20 £3.059m March 21 £2.909m March 22 £3.077m March 23 £3.027m
<b>Budget Carry Forward</b>	Used to carry forward approved unspent monies to the following year.	Budget Carry Forwards are permitted only in accordance with the scheme set out in financial regulations.	March 19 £0.101m March 20 £0.054m March 21 £0.193m March 22 £0.000m March 23 £0.000m
<b>Cost of Structural Change</b>	The reserve gives an opportunity to fund the one-off additional costs arising from restructuring before the benefits are realised.	This reserve will be used to meet organisational wide and departmental restructures where there are demonstrable future benefits.	March 19 £2.290m March 20 £3.158m March 21 £2.929m March 22 £2.900m March 23 £2.900m
<b>Schools' Balances</b>	These funds are used to support future expenditure within the Dedicated Schools Block and include individual school balances.	As the Schools Budget is in an overall deficit position the balance on this earmarked reserve has been transferred to the Dedicated Schools Grant Adjustment Account, a new unusable reserve, as required under the legislation.	March 19 £1.558m March 20 £1.015m March 21 £2.141m March 22 £2.391m March 23 £2.641m
<b>Repairs &amp; Renewals</b>	The Council has accumulated funding in an earmarked reserve from service charges paid by	The reserve is held in order to finance future improvement works thereby reducing pressure on maintenance budgets.	March 19 £0.033m March 20 £0.046m March 21 £0.046m

<b>Reserve</b>	<b>Purpose</b>	<b>Policy</b>	<b>Value</b>
	tenants at Longshot Lane, Forest Park and Liscombe.		March 22 £0.046m March 23 £0.046m
<b>Building Regulation Chargeable Account</b>	A statutory ring fenced account which over time must breakeven.	This reserve is held for specific accounting reasons. The funds in this reserve are ring fenced and cannot be used for any other purpose. The account is currently in deficit and therefore there is no balance on the reserve.	March 19 £0.000m March 20 £0.000m March 21 £0.000m March 22 £0.000m March 23 £0.000m
<b>Commuted Maintenance of Land</b>	Money is received and set aside for the ongoing maintenance of land transferred to the Council under Section 106 agreements.	The reserve will be used to cover the cost of maintaining land transferred to the Council under Section 106 agreements.	March 19 £1.688m March 20 £1.636m March 21 £1.636m March 22 £1.536m March 23 £1.436m
<b>S106 and Travel Plan Monitoring</b>	Money is received and set aside to cover the costs of monitoring developers' compliance with Section 106 agreements, including any travel plan requirements.	The reserve will be used to cover the cost of monitoring developers' compliance with Section 106 agreements, including any travel plan requirements.	March 19 £0.145m March 20 £0.145m March 21 £0.145m March 22 £0.145m March 23 £0.145m
<b>Property Searches Chargeable Account</b>	A reserve created for a statutory ring fenced account which over time must breakeven.	This reserve is held for specific accounting reasons. The funds in this reserve are ring fenced and cannot be used for any other purpose.	March 19 £0.090m March 20 £0.090m March 21 £0.113m March 22 £0.153m March 23 £0.103m
<b>Transformation</b>	A reserve to support investment in service innovation and improvements.	The reserve will be used to meet the upfront costs of transformation.	March 19 £3.622m March 20 £3.179m March 21 £3.370m March 22 £2.188m March 23 £2.669m

<b>Reserve</b>	<b>Purpose</b>	<b>Policy</b>	<b>Value</b>
<b>Revenue Grants Unapplied</b>	A reserve to hold unspent revenue grants and contributions where there are no outstanding conditions.	The reserve will be used to match the grant income to the associated expenditure.	March 19 £3.509m March 20 £10.781m March 21 £14.747m March 22 £13.465m March 23 £13.247m
<b>School Masterplans and Feasibility Studies</b>	A reserve to meet the cost of masterplans and feasibility studies for schools expansion.	Any upfront costs incurred prior to a decision being taken to construct an asset may need to be met from revenue.	March 19 £0.341m March 20 £0.373m March 21 £0.330m March 22 £0.200m March 23 £0.000m
<b>Repairs and Maintenance</b>	A reserve to address 1D priorities (urgent works required to assets which are life expired and/or in serious risk of imminent failure) which are revenue rather than capital in nature.	The reserve will be used for high priority revenue repairs and maintenance. The reserve is no longer required.	March 19 £0.030m March 20 £0.030m March 21 £0.030m March 22 £0.000m
<b>Public Health</b>	Under the conditions of the Public Health grant, any under spend of the ring fenced grant can be carried over via a reserve into the next financial year.	The reserve will be used to fund Public Health priorities and projects.	March 19 £1.560m March 20 £1.719m March 21 £2.513m March 22 £2.391m March 23 £1.633m
<b>Better Care Fund</b>	A reserve to help meet the cost of Better Care Fund priorities and projects.	The reserve will be used to fund Better Care Fund priorities and projects.	March 19 £2.092m March 20 £2.322m March 21 £3.034m March 22 £3.005m March 23 £3.005m
<b>Regeneration of Bracknell Town Centre</b>	A reserve to help meet the cost of Council funded Town Centre initiatives	The reserve will be used to fund Town Centre initiatives.	March 19 £1.792m March 20 £4.313m March 21 £6.038m March 22 £7.002m March 23 £5.256m

<b>Reserve</b>	<b>Purpose</b>	<b>Policy</b>	<b>Value</b>
<b>London Rd Feasibility</b>	A reserve which will be used to meet professional fees regarding the London Road landfill site.	The reserve will be used to cover professional fees relating to the feasibility study. It now includes contributions from the other Berkshire Unitaries.	March 19 £0.238m March 20 £0.212m March 21 £0.212m March 22 £0.212m March 23 £0.000m
<b>Future Funding</b>	A reserve which will be used to smooth the impact of changes in Business Rates income and central government funding decisions.	The reserve will help to balance the revenue budget over the medium term.	March 19 £19.822m March 20 £18.146m March 21 £18.424m March 22 £18.424m March 23 £19.924m
<b>Dilapidations</b>	A reserve to hold funds from tenants for end-of-lease property repairs and reinstatements.	The reserve will be used to carry out repairs and reinstatements to commercial properties required before they can be re-let.	March 19 £0.045m March 20 £0.045m March 21 £0.045m March 22 £0.045m March 23 £0.045m
<b>Schools Support</b>	A reserve to recognise the reduced scope within the dedicated schools grant to provide temporary loans to schools in financial difficulties	To ensure that government policy changes do not impact on the ability to provide temporary loans to schools	March 19 £0.350m March 20 £0.251m March 21 £0.251m March 22 £0.251m March 23 £0.051m
<b>Waste PFI Excess Profits</b>	A new reserve to hold excess profits payments by the contractor under the Waste PFI scheme.	Excess profits payments are potentially repayable, depending on future performance, and have therefore been placed in a reserve.	March 19 £0.087m March 20 £0.124m March 21 £0.164m March 22 £0.164m March 23 £0.164m
<b>Feasibility Studies</b>	A reserve to provide revenue funding in the event that proposed capital schemes do not proceed beyond initial feasibility stage.	Any upfront costs incurred prior to a decision being taken to construct an asset may need to be met from revenue.	March 19 £0.500m March 20 £0.394m March 21 £0.394m March 22 £0.394m March 23 £0.394m

<b>Reserve</b>	<b>Purpose</b>	<b>Policy</b>	<b>Value</b>
<b>ICT Transformation</b>	A reserve to support investment in ICT innovation and improvements.	The reserve will be used to meet the upfront costs of ICT transformation.	March 19 £1.000m March 20 £1.000m March 21 £1.000m March 22 £0.000m
<b>New Schools</b>	A reserve to help support the additional cost arising from new schools over the next four years	The reserve will be used to help meet the cost of new schools in the short term whilst they become established.	March 20 £0.662m March 21 £0.409m March 22 £0.182m March 23 £0.000m
<b>CIL Administrative Costs</b>	Up to 5% of CIL income can be used to meet administrative costs. Income in excess of the budgeted administrative costs will be transferred into this reserve at year end to meet future costs of administering the scheme.	The reserve will be used to meet administrative costs of the scheme where insufficient CIL is received in year.	March 20 £0.298m March 21 £0.298m March 22 £0.372m March 23 £0.372m
<b>Covid-19</b>	A reserve to hold revenue funding provided by Central Government to support the Covid-19 Pandemic.	The reserve will be used to match the grant income to the associated expenditure.	March 20 £2.289m March 21 £2.289m March 22 £2.289m March 23 £1.969m
<b>Business Rates Revaluations</b>	A reserve to guard against the impact of in-year Business Rates valuation adjustments	The reserve will be used to meet the cost of any significant downward Business Rates valuations.	March 21 £7.500m March 22 £7.500m March 23 £7.500m
<b>Business Rates Reliefs</b>	A new reserve to reflect the timing difference between the receipt of S31 grant relating to new Business Rates reliefs and the funding of the resulting deficit on the Collection Fund.	The reserve will be used to meet any Collection Fund deficits relating to Business Rates reliefs agreed by the Government after the budget is set. Funding will be provided from S31 grant received in the previous year.	March 21 £13.047m March 22 £6.940m March 23 £4.512m

**Unusable Revenue Reserves**

Certain reserves are kept to manage the accounting processes and do not represent usable resources for the Council.

<b>Balance</b>	<b>Purpose</b>	<b>Policy</b>	<b>Value</b>
<b>Collection Fund Adjustment Account</b>	A reserve required to reflect Collection Fund changes included in the SORP 2009. The balance represents the difference between the Council Tax income included in the Income and Expenditure Account and the amount required by regulation to be credited to the General Fund.	This balance is held for specific accounting reasons.	March 19 £4.140m March 20 £8.250m March 21 -£11.378m March 22 -£3.000m March 23 £0.000m
<b>Accumulated Absences Account</b>	A reserve which absorbs the differences that would otherwise arise on the General Fund Balance from accruing for compensated absences earned but not taken in the year (e.g. annual leave and flexi-time entitlement carried forward at 31 March). Statutory arrangements require that the impact on the General Fund Balance is neutralised by transfers to or from the Account.	This balance is held for specific accounting reasons.	March 19 -£4.520m March 20 -£5.177m March 21 -£6.182m March 22 -£6.182m March 23 -£6.182m
<b>Pensions</b>	Reflects the Council's share of the Royal County of Berkshire Pension Fund's assets and liabilities. Contributions will be adjusted to ensure any projected deficit is funded.	This balance is held for specific accounting reasons.	March 19 -£269.419m March 20 -£245.019m March 21 -£348.690m March 22 -£348.690m March 23 -£348.690m
<b>Dedicated Schools Grant Adjustment Account</b>	This is a new unusable reserve required under the Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 as amended by The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2020.	If the Schools Budget is in a deficit position for the financial years 2020/21 to 2022/23 the balance is held against this account per the new legislation	March 21 -£2.626m March 22 -£10.187m March 23 -£17.687m

**PROVISIONAL BUDGET SUMMARY STATEMENT**  
**Subject to amendment in the light of final budget decisions**

Line		2022/23	2021/22
		£'000	£'000
	<b>Bracknell Forest's Expenditure</b>		
1	Central	19,970	19,389
2	Delivery	16,495	14,813
3	People	88,815	81,529
4	Corporate Wide Items (to be allocated)	657	1,363
5	<b>Sub-Total</b>	<b>125,937</b>	<b>117,094</b>
6	<b>Non-Departmental Expenditure</b>		
7	Contingency provision	1,900	2,250
8	Covid-19 Contingency provision	0	3,417
9	Debt Financing Costs (Minimum and Voluntary Revenue Provisions)	2,242	2,064
10	Levying Bodies	124	115
11	Interest	1,638	2,010
12	Pension Interest Cost & Administration Expenses	5,782	5,782
13	Other Services	230	233
14	Business Rates Growth	(9,537)	(6,523)
15	Contribution from Capital Resources	(200)	(200)
16	Capital Charges	(15,302)	(15,302)
17	Contribution from Pension Reserve	(15,125)	(15,125)
18	Contribution to/(from) Earmarked Reserves	<<<<<<	(10,225)
19	Contribution from DSG Adjustment Account	(7,500)	(4,943)
18	Covid-19 LA Support Grant	0	(2,654)
19	New Homes Bonus grant	(2,294)	(2,877)
20	Flood and Travel Related Grants	(15)	(14)
21	Lower Tier Services Grant	(199)	(189)
22	Local Council Tax Support Grant	0	(827)
23	Services Grant	(1,160)	0
24	<b>Net Revenue Budget</b>	<b>&lt;&lt;&lt;&lt;&lt;</b>	<b>74,086</b>
25	Movement in General Fund Balances	<<<<<	(1)
26	<b>Net Revenue Budget after use of balances</b>	<b>&lt;&lt;&lt;&lt;&lt;</b>	<b>74,085</b>
27	Less - External Support		
28	Business Rates	(16,832)	(16,832)
29	Revenue Support Grant	(1,837)	(1,781)
30	Collection Fund Adjustment – Council Tax	(354)	(144)
31	Collection Fund Adjustment – Business Rates	2,428	11,498
32	<b>Bracknell Forest's Council Tax Requirement</b>	<b>&lt;&lt;&lt;&lt;&lt;</b>	<b>66,826</b>
33	<b>Collection Fund</b>		
34	Bracknell Forest's Requirement	<<<<<	66,826
35	divided by the Council Tax Base ('000)	48.249	47.624
36	<b>Council Tax at Band D (excluding Parishes)</b>		
37	Bracknell Forest	£<<<<<	£1,403.19



## Financial Support for Low-Income Households

### 1 Introduction

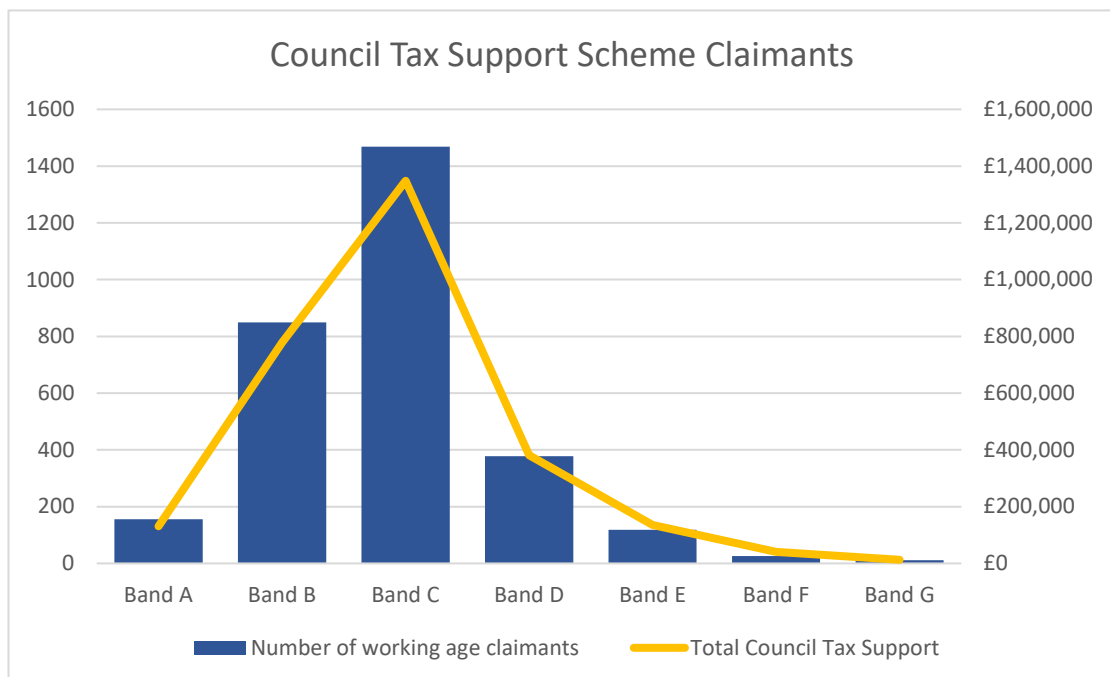
1.1 This paper captures the current range of support available from the Council for households experiencing or at risk of experiencing financial hardship. It also identifies a series of further options to help mitigate the impact of further cost of living increases over the next few years for low-income households, helping secure their financial stability.

### 2 Context

2.1 Bracknell Forest is generally an affluent area where the majority of residents are in a stable, independent financial position. However, insight gained through community impact assessments and anecdotal evidence suggest that there are increasing levels of financial hardship and deprivation resulting from the COVID-19 pandemic. While household finances for many will be positively affected by the changes in National Living Wage (NLW) from April 2022 (increasing by 6.6% to £9.50 for those aged 23 and over), rapidly rising energy prices and cost of living increases generally will make it more challenging to balance finances.

2.2 There are currently 3,006 working age households in the Borough receiving support as part of the council tax reduction scheme at an overall cost of £2.8m per annum. They receive between a 20% and an 80% discount, on a scale for those with income less than £440 per week. The most common property type in Bracknell Forest is band C, and the lowest a household will pay is for a band A property. The number of claimants and cost of the support provided is detailed in figure 1 below.

Figure 1. Number of working age households claiming council tax support.



- 2.3 These working-age households have also received a £150 discount to their council tax bills as part of the Government and Council's COVID-19 support for the previous two years, at a cost of around £450,000 per year, funded from specific Government grants. It is recognised that these households will experience a substantial difference in cost if this discount is removed immediately, exacerbated by any further general rise in the level of council tax, as illustrated in Figure 2 below.

Figure 2. Potential council tax increase impact for working age household receiving a council tax discount and the additional £150 in 2021/22. 'SPD' means single person discount, an additional 25% reduction.

**Council Tax payments per month (if £150 reduction is removed from 2022/23)**

Property Band	Council Tax Support Scheme Discount	2019/20 <i>No £150 reduction</i>	2021/22 <i>Incl. £150 reduction</i>	2022/23 <i>Incl. max. 4.49% increase</i>	2023/24 <i>Incl. max. 2.99% increase</i>	2024/25 <i>Incl. max. 2.99% increase</i>	Max. Three year Change 2021/22-2024/25	Max. Five year Change 2019/20-2024/25
Band A SPD	20% discount	£55.34	£47.37	£62.56	£64.43	£65.90	<b>+£18.53 (+39%)</b>	<b>+£10.56 (+19%)</b>
	80% discount	£13.83	£2.47	£15.64	£16.11	£16.59	<b>+£14.12 (+572%)</b>	<b>+£2.76 (+20%)</b>
Band A	20% discount	£73.78	£67.33	£83.41	£85.91	£88.49	<b>+£21.16 (+31%)</b>	<b>+£14.71 (+20%)</b>
	80% discount	£18.45	£7.46	£20.85	£21.48	£22.12	<b>+£14.66 (+197%)</b>	<b>+£3.67 (+20%)</b>
Band C	20% discount	£98.37	£93.93	£111.21	£114.54	£117.96	<b>+£24.03 (+26%)</b>	<b>+£19.59 (+20%)</b>
	80% discount	£24.59	£14.11	£27.80	£28.63	£29.49	<b>+£15.38 (+109%)</b>	<b>+£4.90 (+20%)</b>

- 2.4 These households' overall bills still remain substantially lower than for others, with a non-discounted Band A council tax bill potentially £111.12 per month in 2024/25 (if the maximum permitted council tax increases are applied). They have also seen substantially lower bills in 2020/21 and 2021/22 than in the years before. However, they will experience what will feel like a disproportionately large increase in expense if the £150 discount is removed immediately from next year. This situation will be faced by residents in many local authority areas.
- 2.5 This paper explores options that could be introduced to provide support to such households and highlights available safety nets for those experiencing particularly acute financial hardship. The options presented attempt to balance the support to individual households with the need for sustainable finances for the Council, while also promoting financial independence within the community and where possible, increasing employment options for those with low barriers to work.

### 3 Current Hardship Support

- 3.1 In addition to the council tax reduction scheme, there is also a discretionary council tax support fund (£10,850), which is intended to support those already receiving council tax support but are facing additional short-term hardship.
- 3.2 More widely, there is a broad range of support currently available to residents and households with low incomes and / or experiencing temporary hardship, including:
- The Local Welfare Scheme (£20,000), which provides emergency and crisis support with the essentials needed to keep safe and well. This could include help with heating, lighting or food support or a furniture package to support a discharge from residential care. Any resident can apply for this if they are facing financial hardship.
  - Grants from the Department for Work and Pensions (DWP) have enabled the Council to support households with children receiving free school meals (£215 per child over the last 12 months) and more recently to those receiving a low-income based council tax discount (£50 supermarket voucher per household). Families with children eligible for free school meals and equivalent under-fives will continue to receive this financial support over the February half term and Easter holiday. The Government has recently announced that funding will also continue to be provided for the Holiday Activities and Food Programme for the next three years, totalling £248,000 for next year, continuing an existing covid-related grant.
  - The Council has supported specialist agencies in the voluntary and community sectors to help meet the specific needs of specific cohorts within the community. £20,000 of funding from the DWP has been provided to the Bracknell Foodbank to purchase fresh food and fuel payment top ups, while a further £10,000 has been passported to The Ark to distribute to low income carers to help with essential items. Wider groups that may be affected by financial hardship, such as the clinically extremely vulnerable (CEV) cohort, have also had an increase in funding from the council, with over £100,000 committed to the third sector through projects such as the Older People's Consortium, a community transport scheme and a digital inclusion project.
  - The Council's budget proposals for 2021/22 included a £300,000 Covid welfare fund, available to residents facing financial hardship. This has been used to support a range of initiatives including the following (any balance remaining at the end of the current year will be carried forward);
    - Providing additional funding to children's social care for emergency section 17 funding
    - The Imagination Library scheme, sending vulnerable households with children under five years old books to help with education and building relationships
    - Topping up the value of school holiday supermarket vouchers during the summer 2021

## 4 Identifying Families and Households Most At Risk

- 4.1 There are a number of different risk indicators related to financial hardship. Identifying these factors and the households affected will provide evidence to support where targeted actions could most effectively mitigate financial pressures. The Council has invested in software to better understand the local population and this will provide, in time, a strong evidence base for identifying at risk families. A fixed term post has also been recruited to investigate, explore and seek to understand financial hardship across the borough. This is with the aim of supporting the development of a strategic approach focussed on early intervention and maximising households' financial independence and well-being.
- 4.2 A high level needs analysis is currently in development to understand the extent of financial hardship in the borough and will include mapping of existing support within the council and across partners. This work is expected to be completed in February 2022 and will be followed with a detailed action plan to address the findings.
- 4.3 Headline information that is known at this point can be summarised as follows:
- There are around 3,000 working age households receiving an income-based council tax reduction. There are likely to be larger families with higher overall incomes that do not qualify for this support due to the income threshold but have outgoings that exceed their income. A further 1,850 households are pensioners who receive council tax support assessed under a national framework.
  - The council's Low Income Family Tracker software shows that a total of 5,595 households are considered low income and at risk of financial hardship. These households include 3,090 children. Within this, there are 2,051 households deemed to be in relative poverty (i.e. their income is below 60% UK median income), mostly concentrated in Bracknell town centre wards such as Priestwood and Garth, Old Bracknell, Harmans Water and Hanworth. 90 households are considered newly in relative poverty, this includes 77 children.
  - There are 296 households, with 185 children, who have a cash shortfall. This means their take-home income is less than their expected expenditure and the household does not have enough savings to meet three months' worth of expenditure. These are at risk of requiring immediate financial hardship support. Of these, 127 are not currently in receipt of council tax reductions that they may be entitled to, were they to apply.
  - Another vulnerable group is households with caring responsibilities and there are currently 14 carer households with a cash shortfall and a further eight households that are struggling (i.e. their take home income is less than £100 above their expected expenditure and they have less than three months' worth of savings).
  - There are currently 432 low-income households where at least one household member is working age, not in work and considered to have low barriers to employment.

## 5 Opportunities for Preventative Actions

- 5.1 Following on from the work to identify households most at risk of experiencing financial hardship, an action plan will be developed to establish a clear long term and comprehensive approach for supporting the financial resilience of the community. This will provide a detailed report for at risk groups in the borough and provide a set of cross-council recommendations for supporting community financial resilience.
- 5.2 It is expected that a two-year fixed term post will be required to focus on targeted outreach work within the local community. This would use the Low Income Family Tracker data and other insight from the needs analysis to identify households that could be accessing existing government support or who could be managing their finances more effectively. For example, registering an eligible child for free school meals is worth around £600 per year to families (with further value to schools) and £500 per year for Healthy Start vouchers. Registering an eligible household for 30 hours free childcare can be worth around £5,000 per year and identifying households for pension credit could gain households £3,000 per year.
- 5.3 Subject to Members' agreement, an immediate action would be to contact the 127 households who are facing a cash shortfall but not yet registered for the council tax reduction scheme. They are likely to be eligible for the support. This would save each household on average £75 per month, at a cost to the Council of up to approximately £115,000 per year.
- 5.4 Recognising that the most sustainable option to improve the stability of residents' finances is for them to move into or to increase hours of employment, developing or commissioning employment support to reach out to the 432 households with low barriers to work is likely to be a priority action. This is likely to be working with Job Centre Plus and other relevant agencies. Whilst it might not be feasible for all households to move into work, supporting work on the minimum wage would increase a household's income on average by £6,000 and improve their wellbeing and opportunities for progression.
- 5.5 Potential changes to the current council tax support scheme can be modelled over the next few months for Members' consideration prior to any changes being proposed for public consultation. Currently the scheme operates on an income band basis which does not differentiate between households of varying sizes. This means that a single person household with the same employed earnings as a household of three would receive the same level of support in the current scheme, despite the likely difference in outgoings. In addition, the maximum that a household can receive is capped at 80% so that all households of working age pay something towards their council tax bills. This level is at the discretion of individual councils and can be changed. However, council tax support arrangements for those of Pension Age are set nationally and would not be affected by any changes to the local scheme.

## 6 Mitigating Council Tax Increases

- 6.1 Council Tax is the main source of funding for local authorities and the Government assumes in its calculation of council funding that maximum permitted increases will be applied each year by all councils. While council tax bills in Bracknell Forest for low income households have been reduced by £150 in both 2020/21 and in 2021/22 using specific Government grants, reducing future council tax bills with further on-going cash reductions is not a long-term sustainable model for the council, nor does it improve the financial resilience of the community. However, one-off funding is available from COVID-19 grants received in 2019/20 but not yet spent (£2m) that could be used to support short-term proposals.
- 6.2 Short-term and tapered council tax discounts for working age households receiving low-income based discount of £100 per household could be supported in 2022/23 at a cost of £0.320m. Subject to an assessment of overall affordability, a reducing level of discount could also be provided in future years' budgets. This tapering approach would help prevent a sudden and significant unmitigated increase in the council tax bill for households as described in figure 2 and is recommended.

## 7 Next Steps

- 7.1 With Members' support, work will continue on broader initiatives to assist households experiencing or at risk of financial hardship, aiming to reduce financial inequalities across the community and positively affect health, wellbeing and employment prospects. This will include pursuing the following preventative actions:
- a) contacting households who we are aware may be eligible for a council tax reduction but are not currently receiving this.
  - b) Complete the financial hardship needs analysis and action plan, noting the likely requirement to recruit a two-year fixed term post to drive uptake campaigns for residents to benefit from existing government support;
  - c) Reviewing the council tax reduction scheme to identify options that could reflect the financial pressures facing larger families;
  - d) Develop a pathway for employment support for those with 'low barriers' to employment.

### Contact for further information

Stuart McKellar, Executive Director: Resources – 01344 352180

[Stuart.mckellar@bracknell-forest.gov.uk](mailto:Stuart.mckellar@bracknell-forest.gov.uk)

Katie Flint, Chief Executive's Office - 01344 352217

[Katie.flint@bracknell-forest.gov.uk](mailto:Katie.flint@bracknell-forest.gov.uk)

Action	Approximate Cost	Timescale
Immediate actions		
Tapered Council Tax discount payment (based at this time on £100 in 2022/23). Further discounts to be considered in subsequent years would add to this cost	£320,000	2022/23
Preventative Actions		
Uptake campaign for Council Tax Discount Scheme	Up to £115,000 per year (impacting on Collection Fund performance)	By start 2022/23, but financial impact for BFC from 2023/24, subject to overall Collection Fund performance
Financial Hardship Needs Analysis and Action Plan	TBC – will likely use the existing welfare funding for costs	Complete in 2022 to cover three year period to 2025
Explore adjustment to council tax reduction scheme to better reflect the cost pressures for larger families	TBC – not expected to increase overall cost of scheme	Detailed report April 2022 for implementation 2023/24
Outreach post for 2 years (if approved to support delivery of action plan)	Approximately £70,000	Two year period
Employment support pathway	TBC – dependent on pathway developed	Three year period

## Initial Equalities Screening Record Form


<b>Date of Screening:</b>	<b>Directorate: Delivery</b>	<b>Section: Library Service</b>	
<b>1. Activity to be assessed</b>	Deleting two full-time library staff vacant posts from the establishment and cutting £20,000 from the stock fund in order to make a total budget saving of £84,000.		
<b>2. What is the activity?</b>	<input type="checkbox"/> Policy/strategy <input type="checkbox"/> Function/procedure <input type="checkbox"/> Project <input type="checkbox"/> Review <input checked="" type="checkbox"/> Service <input type="checkbox"/> Organisational change		
<b>3. Is it a new or existing activity?</b>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Existing		
<b>4. Officer responsible for the screening</b>	Fiona Atkinson, Library Services Manager		
<b>5. Who are the members of the screening team?</b>	Fiona Atkinson, Library Services Manager; Sharon Pickles, Central Services Manager		
<b>6. What is the purpose of the activity?</b>	To reduce the cost of the Library Service by deleting 2 FTE Library staff posts from the establishment and by reducing the stock fund by £20,000.		
<b>7. Who is the activity designed to benefit/target?</b>	The Library Service is a statutory service under the terms of the Public Libraries and Museums Act 1964. The aim is to provide a comprehensive and efficient library service to all who live, work or study in Bracknell Forest. The service is currently delivered through 9 Libraries, a Home Library Service, and through a large range of free physical and digital resources, such as e-books, e-audio books, e-magazines, e-comics, and online subscription services. The Libraries also offer free access to public PCs and the Internet, in addition to free Wi-Fi. Library staff also provide support and training in use of ICT and online resources. Residents have the opportunity to attend a wide range of activities and events which are well attended and many rely on the Service to combat social isolation.		
<b>Protected Characteristics</b> Fiona Atkinson, Library Services Manager	<b>Please tick yes or no</b>	<b>Is there an impact?</b> What kind of equality impact may there be? Is the impact positive or adverse or is there a potential for both? If the impact is neutral please give a reason.	<b>What evidence do you have to support this?</b> E.g equality monitoring data, consultation results, customer satisfaction information etc Please add a narrative to justify your claims around impacts and describe the analysis and interpretation of evidence to support your conclusion as this will inform members decision making, include consultation results/satisfaction information/equality monitoring data
<b>8. Disability Equality – this can include physical, mental health, learning or sensory disabilities and includes conditions such as dementia as well as hearing or sight impairment.</b>	<b>Y</b>	<b>N</b> √	<p>Visually impaired users can borrow up to 6 free spoken word items at a time, and customers with a hearing impairment can borrow up to 2 free DVDs at a time.</p> <p>The Books on Prescription Service is designed to help users with mental illness.</p> <p>There is no evidence of any specific impact of a staff reduction at this time, as the posts have been vacant for some time.</p> <p>There are no plans to reduce Spoken Word items, nor self-help books to support mental illness.</p> <p>Although the intention is to reduce the DVD budget by £7,000, loans of DVDs have fallen considerably due to</p>



				many customers subscribing to streaming services such as Netflix. The Library Service is looking to subscribe to a film streaming service such as Kanopy as an alternative to DVDs and to mitigate any negative impact.
<b>9. Racial equality</b>	Y	N √	<b>Neutral</b> Physical books and e-resources are available in other languages and about other cultures.	There is no evidence of any specific impact at this time as there are no plans to reduce stock in these areas.
<b>10. Gender equality</b>	Y	N √	<b>Neutral</b> Physical books and e-resources are available on a broad range of subjects and genres throughout the Library Service.	It is a national trend that women are the majority of users of a library service and Bracknell Forest is no exception.  E+ data indicates that 60% of overall library transactions are made by women, and 56% of new enrolments are women.  There is no evidence of any specific impact at this time. The plan is to reduce the number of duplicate adult Fiction paperback titles across the service where hardback titles have already been purchased and demand has, therefore, already been satisfied to a large extent. E-book lending has also reduced the demand for multiple physical copies of popular fiction titles. The saving is estimated as £5,000.
<b>11. Sexual orientation equality</b>	Y	N √	<b>Neutral</b> LGBTQ titles in all formats are purchased and interfiled with other stock. They are identified on the Library catalogue.	There is no evidence of any specific impact at this time as there are no plans to reduce stock in these areas.
<b>12. Gender re-assignment</b>	Y	N √	<b>Neutral</b> Physical books and e-resources are available on a broad range of subjects throughout the Library Service.	There is no evidence of any specific impact at this time as there are no plans to reduce stock in these areas.
<b>13. Age equality</b>	Y	N √	Physical books and e-resources are available on a broad range of subjects and to suit all age groups.	E+ data indicates that: 11% of enrolments and 36% of transactions are aged 65+.

				<p>37% of enrolments and 31% of transactions are below the age of 18.</p> <p>There is no evidence of any specific impact at this time. The plan is to reduce the number of duplicate Children's fiction titles and board books across the service where titles have already been purchased and demand has, therefore, already been satisfied to a large extent. The saving is estimated as £8,000.</p> <p>Children's books can be requested free of charge and delivered to any Library within the Borough.</p>
<b>14. Religion and belief equality</b>	Y	N √	<b>Neutral</b> Physical and e-resources on different faiths and beliefs are available throughout the Library Service.	There is no evidence of any specific impact at this time as there are no plans to reduce stock in these areas.
<b>15. Pregnancy and maternity equality</b>	Y	N √	<b>Neutral</b>	At this stage, no evidence has been identified of a differential impact on this protected characteristic.
<b>16. Marriage and civil partnership equality</b>	Y	N √	<b>Neutral</b>	At this stage, no evidence has been identified of a differential impact on this protected characteristic.
<b>17. Please give details of any other potential impacts on any other group (e.g. those on lower incomes/carers/ex-offenders, armed forces communities) and on promoting good community relations.</b>			<p>Libraries play an important role in supporting people on a low income, who borrow books as they cannot afford to purchase them, who do not have access to ICT facilities at home, or who have poor connectivity or lack digital skills, or who live alone and use libraries to meet people and combat social isolation. Libraries keep local communities connected, supporting the vulnerable and providing information on health and wellbeing.</p> <p>Carers, or vulnerable people confined to their homes can borrow books free of charge and delivered to their door by the Home Library Service.</p> <p>The Library Service holds a wide range of cultural and social events to foster good relations between all sectors of the community.</p> <p>The reduction in stock and staffing does not have a potential negative impact on the above but could result in negative impacts if further cuts to the Service were to take place.</p>	


18. If an adverse/negative impact has been identified can it be justified on grounds of promoting equality of opportunity for one group or for any other reason?	None have been identified.		
19. If there is any difference in the impact of the activity when considered for each of the equality groups listed in 8 – 14 above; how significant is the difference in terms of its nature and the number of people likely to be affected?	<p>The deletion of two vacant posts will not have any impact on the equality groups.</p> <p>There is a very minimal impact on women and children , as the largest number of Library users, by reducing the number of duplicate and paperback fiction titles, although the impact will be mitigated by purchase of multiple hardback titles, which are always published first and, therefore, satisfy initial demand, the increased purchase of e-book and e-audio titles, and free requests for all children's books from any of the Borough's nine Libraries.</p>		
20. Could the impact constitute unlawful discrimination in relation to any of the Equality Duties?	Y	N √	Please explain for each equality group
21. What further information or data is required to better understand the impact? Where and how can that information be obtained?	<p>Regular up-to-date public satisfaction surveys.</p> <p>The Library Service has customer feedback and stock suggestion forms and feedback can also be left online.</p> <p>A lapsed user survey.</p> <p>Annual CIPFA data on library usage.</p> <p>All of the above are used to inform service planning and development.</p>		
22. On the basis of sections 7 – 17 above is a full impact assessment required?	Y	N √	<p>Please explain your decision. If you are not proceeding to a full equality impact assessment make sure you have the evidence to justify this decision should you be challenged.</p> <p>If you are proceeding to a full equality impact assessment, please contact <a href="mailto:Samantha.wood@bracknell-forest.gov.uk">Samantha.wood@bracknell-forest.gov.uk</a> or <a href="mailto:Harjit.Hunjan@bracknell-forest.gov.uk">Harjit.Hunjan@bracknell-forest.gov.uk</a></p>
23. If a full impact assessment is not required; what actions will you take to reduce or remove any potential differential/adverse impact, to further promote equality of opportunity through this activity or to obtain further information or data? Please complete the action plan in full, adding more rows as needed.			
Action	Timescale	Person Responsible	Milestone/Success Criteria
Monitoring customer feedback and reprofiling of stock fund.	6 months	Fiona Atkinson	Customer satisfaction feedback.

<b>24. Which service, business or work plan will these actions be included in?</b>	Delivery Service Plan. Annual Library Plan.
<b>25. Please list the current actions undertaken to advance equality or examples of good practice identified as part of the screening?</b>	Library staff undertake Equality and Diversity training. Stock is purchased in other languages and the Library Service subscribes to e-resources such as PressReader, which enables access to thousands of newspapers and magazines in other languages.  The Library Service responds to customer comments and stock suggestions.  Resources are purchased in a wide range of formats, including Large Print books, Spoken Word, e-books and e-audio books. Downloaded texts can be adapted for easier reading.  A large programme of activities and events to increase participation and generate awareness.  Opportunities for volunteering.
<b>26. Assistant Director/Director signature.</b>	Signature:  Date: 31-1-22

## Initial Equalities Screening Record Form

<b>Date of Screening:</b>	<b>Directorate: Delivery</b>	<b>Section:ICT</b>	
<b>1. Activity to be assessed</b>	Please give full details of the activity Staff Reduction following move to the Cloud. The ICT team is likely to be reduced by four to five staff, whose skills are no longer required to support the new operating model.		
<b>2. What is the activity?</b>	<input type="checkbox"/> Policy/strategy <input type="checkbox"/> Function/procedure <input type="checkbox"/> Project <input type="checkbox"/> Review <input type="checkbox"/> Service <input checked="" type="checkbox"/> Organisational change		
<b>3. Is it a new or existing activity?</b>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Existing		
<b>4. Officer responsible for the screening</b>	Bobby Mulheir, Assistant Director		
<b>5. Who are the members of the screening team?</b>	Fiona Atkinson, Library Services Manager Colin Stenning, Head of Digital Dan Tutty, Enterprise Architect Diksha Vyas, Digital & ICT Business Partner Ken Connolly, Digital & ICT Programme Manager Matt Howlett, Transport & Support Services Manager Toni Ball, Head of Customer Services		
<b>6. What is the purpose of the activity?</b>	Reduction in support staff following move of ICT estate from on-prem to cloud. Some skills currently in the team are no longer required to support the future operating model.		
<b>7. Who is the activity designed to benefit/target?</b>	All		
<b>Protected Characteristics</b>	<b>Please tick yes or no</b>	<b>Is there an impact?</b> What kind of equality impact may there be? Is the impact positive or adverse or is there a potential for both? If the impact is neutral please give a reason.	<b>What evidence do you have to support this?</b> E.g equality monitoring data, consultation results, customer satisfaction information etc Please add a narrative to justify your claims around impacts and describe the analysis and interpretation of evidence to support your conclusion as this will inform members decision making, include consultation results/satisfaction information/equality monitoring data
<b>8. Disability Equality – this can include physical, mental health, learning or sensory disabilities and includes conditions such as dementia as well as hearing or sight impairment.</b>	Y	N	The Organisational Change protocol will be followed to ensure fairness when selecting the staff who will be made redundant.

<b>9. Racial equality</b>	Y	N		The Organisational Change protocol will be followed to ensure fairness when selecting the staff who will be made redundant.
<b>10. Gender equality</b>	Y	N		The Organisational Change protocol will be followed to ensure fairness when selecting the staff who will be made redundant.
<b>11. Sexual orientation equality</b>	Y	N		The Organisational Change protocol will be followed to ensure fairness when selecting the staff who will be made redundant.
<b>12. Gender re-assignment</b>	Y	N		The Organisational Change protocol will be followed to ensure fairness when selecting the staff who will be made redundant.
<b>13. Age equality</b>	Y	N	It is possible that older team members would be those most likely not to have the skills required for the future operating model.	The Organisational Change protocol will be followed to ensure fairness when selecting the staff who will be made redundant.
<b>14. Religion and belief equality</b>	Y	N		The Organisational Change protocol will be followed to ensure fairness when selecting the staff who will be made redundant.
<b>15. Pregnancy and maternity equality</b>	Y	N		The Organisational Change protocol will be followed to ensure fairness when selecting the staff who will be made redundant.
<b>16. Marriage and civil partnership equality</b>	Y	N		The Organisational Change protocol will be followed to ensure fairness when selecting the staff who will be made redundant.
<b>17. Please give details of any other potential impacts on any other group (e.g. those on lower incomes/carers/ex-offenders, armed forces communities) and on promoting good community relations.</b>	N/A			
<b>18. If an adverse/negative impact has been identified can it be justified on grounds of promoting equality of opportunity for one group or for any other reason?</b>	N/A			
<b>19. If there is any difference in the impact of the activity when considered for each of the equality groups listed in 8 – 14 above; how significant is the</b>				

<p>difference in terms of its nature and the number of people likely to be affected?</p>			
<p>20. Could the impact constitute unlawful discrimination in relation to any of the Equality Duties?</p>	<p>Y</p>	<p>N</p>	
<p>21. What further information or data is required to better understand the impact? Where and how can that information be obtained?</p>			
<p>22. On the basis of sections 7 – 17 above is a full impact assessment required?</p>	<p>Y</p>	<p>N</p>	<p>The council's Organisational Change Protocol is designed to ensure fairness in selection.</p>
<p>23. If a full impact assessment is not required; what actions will you take to reduce or remove any potential differential/adverse impact, to further promote equality of opportunity through this activity or to obtain further information or data? Please complete the action plan in full, adding more rows as needed.</p>			
<p><b>Action</b></p>	<p><b>Timescale</b></p>	<p><b>Person Responsible</b></p>	<p><b>Milestone/Success Criteria</b></p>
<p>24. Which service, business or work plan will these actions be included in?</p>			
<p>25. Please list the current actions undertaken to advance equality or examples of good practice identified as part of the screening?</p>			
<p>26. Assistant director's signature.</p>	<p>Signature: </p>		<p>Date: 3 November 2021</p>

## Initial Equalities Screening Record Form

Date of Screening: 29-10-21	Directorate: People		Section: Early Help and Communities - Housing
1. Activity to be assessed	Proposed Saving/Income Generation – 2022/23 budget		
2. What is the activity?	<input type="checkbox"/> Policy/strategy <input type="checkbox"/> Function/procedure <input type="checkbox"/> Project <input type="checkbox"/> Review <input checked="" type="checkbox"/> Service <input type="checkbox"/> Organisational change		
3. Is it a new or existing activity?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Existing – extension to existing		
4. Officer responsible for the screening	Sarah Gee		
5. Who are the members of the screening team?	N/A		
6. What is the purpose of the activity?	Increase income on BFC residential property through leasing arrangements with Look Ahead Housing Association. These properties are owned by BFC and are used to accommodate Adult Social Care clients with learning disabilities. By leasing them to a registered housing association, rents can be set at a level that maximises Housing Benefits, and therefore maximises income to the Council under a lease arrangement.		
7. Who is the activity designed to benefit/target?			
Protected Characteristics	Please tick yes or no	Is there an impact? What kind of equality impact may there be? Is the impact positive or adverse or is there a potential for both? If the impact is neutral please give a reason.	What evidence do you have to support this? E.g equality monitoring data, consultation results, customer satisfaction information etc Please add a narrative to justify your claims around impacts and describe the analysis and interpretation of evidence to support your conclusion as this will inform members decision making, include consultation results/satisfaction information/equality monitoring data
8. Disability Equality – this can include physical, mental health, learning or sensory disabilities and includes conditions such as dementia as well as hearing or sight impairment.	Y	N	No. The change concerns property providing accommodation for people with learning disabilities. However, no negative or positive impacts are anticipated.  For the properties in scope, rent would increase but would be covered by housing benefits. This would need to be carefully communicated with clients/their advocates. A meeting has been held with the CTPLD manager who confirms that none of the individuals placed/likely to be placed are working and all are on full Housing Benefit. There should be no impact on residents therefore arising from a substantial rental increase.  The landlord would change but there should be no difference in service level. This arrangement is already



				in place for other similar properties owned by DHL, the Council's housing company. Again the change needs to be carefully communicated to family members of advocates for these clients to avoid any misconceptions and to manage any concerns – if indeed any arise..
<b>9. Racial equality</b>	Y	N	N/A	
<b>10. Gender equality</b>	Y	N	N/A	
<b>11. Sexual orientation equality</b>	Y	N	N/A	
<b>12. Gender re-assignment</b>	Y	N	N/A	
<b>13. Age equality</b>	Y	N	N/A	
<b>14. Religion and belief equality</b>	Y	N	N/A	
<b>15. Pregnancy and maternity equality</b>	Y	N	N/A	
<b>16. Marriage and civil partnership equality</b>	Y	N	N/A	
<b>17. Please give details of any other potential impacts on any other group (e.g. those on lower incomes/carers/ex-offenders, armed forces communities) and on promoting good community relations.</b>	Please explain As above – the properties in scope are those where residents are all on Housing Benefit and are considered not able to work in the future. As a result the change in rental will not impact them as it will be fully covered by state benefits.			
<b>18. If an adverse/negative impact has been identified can it be justified on grounds of promoting equality of opportunity for one group or for any other reason?</b>	Please explain			

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<p><b>19. If there is any difference in the impact of the activity when considered for each of the equality groups listed in 8 – 14 above; how significant is the difference in terms of its nature and the number of people likely to be affected?</b></p>	<p>Please explain</p>		
<p><b>20. Could the impact constitute unlawful discrimination in relation to any of the Equality Duties?</b></p>	<p>Y</p>	<p>N</p>	<p>No.</p>
<p><b>21. What further information or data is required to better understand the impact? Where and how can that information be obtained?</b></p>	<p>Please see attached proposal</p>		
<p><b>22. On the basis of sections 7 – 17 above is a full impact assessment required?</b></p>	<p>Y</p>	<p>N</p>	<p>No as there is no impact</p>
<p><b>23. If a full impact assessment is not required; what actions will you take to reduce or remove any potential differential/adverse impact, to further promote equality of opportunity through this activity or to obtain further information or data? Please complete the action plan in full, adding more rows as needed.</b></p>			
<p><b>Action</b></p>	<p><b>Timescale</b></p>	<p><b>Person Responsible</b></p>	<p><b>Milestone/Success Criteria</b></p>
<p></p>	<p></p>	<p></p>	<p></p>
<p></p>	<p></p>	<p></p>	<p></p>
<p></p>	<p></p>	<p></p>	<p></p>
<p><b>24. Which service, business or work plan will these actions be included in?</b></p>	<p></p>		
<p><b>25. Please list the current actions undertaken to advance equality or examples of good practice identified as part of the screening?</b></p>	<p>In developing the proposal and agreeing properties in scope we have liaised with operational management from the Community Team for People with Learning Disabilities. This has ensured that the two properties in scope have been agreed following an assessment of both financial benefits and equalities impacts across a number of properties.</p>		
<p><b>26. Assistant director's signature.</b></p>	<p>Signature: Sarah Gee</p>		<p>Date: 29/10/21</p>

To: **Executive**  
**8 February 2022**

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## **Annual Review of JV Business Plan 2020-2023** **Executive Director: Resources**

### **1 Purpose of Report**

- 1.1 The first Business Plan for the Property Joint Venture (JV), which is a partnership between the Council and Countryside Properties (UK), was agreed by the Council at its meeting on 25 November 2020 and covers the period 2020-2023. This plan sets out the agreed objectives for the Joint Venture over this period, included anticipated budgets and profits from the first 3 sites to be developed. The Bracknell Forest Cambium Partnership was formally incorporated as a limited liability partnership (LLP) in December 2020.
- 1.2 This report sets out the progress made against the Business Plan objectives to the end of December 2021. It also outlines changes proposed by the Partnership for the remainder of the Business Plan period to December 2023. Under the legal agreements the Business Plan is required to be reviewed and any changes agreed annually or as reasonably requested by each partner. The refreshed JV Business Plan (attached as Annex A) has been agreed by the LLP Board to be recommended to each partner organisation for consideration and approval.

### **2 Recommendations**

**That the Executive:**

- 2.1 **Notes the progress made by Bracknell Forest Cambium Partnership for the period December 2020 to December 2021.**
- 2.2 **Supports the refresh of the JV Business Plan 2020-2023 for the Bracknell Forest Cambium Partnership as set out in Annex A and the financial budget and forecast as set out in Confidential Annex B.**

### **3 Reasons for Recommendation(S)**

- 3.1 The recommendations support the fulfilment of Bracknell Forest Cambium Partnership's objectives and aligns with the legal agreements entered by the partners, which require the agreed JV Business Plan to be formally reviewed each year. There have been no material changes made to legal agreements signed in December 2020 between the partners. The JV Business Plan has not changed materially, although the Jubilee Gardens site will now be considered as part of a wider master planning of secondary sites that has been commissioned by the Council and the Executive has agreed to offer surplus land at the Depot site to the JV under a 12 month exclusivity agreement.
- 3.2 Following a strategic options appraisal, the Council agreed to establish a joint venture partnership as the optimum approach to securing delivery of its regeneration objectives, articulated in the Bracknell Town Centre Vision 2032. Over its lifetime, the Bracknell Forest Cambium Partnership will play a prominent role in realising

Bracknell's full potential, building on the success of the Lexicon development. The Council and the Partnership share a long-term ambition that, when realised, will see significant change to the town centre landscape. Expected investment of over £250m will bring forward around 1,000 new homes, of which 35% will be affordable, and an additional 35,000sqft of new commercial and retail space. While the Council's prime driver is to secure regeneration, its 50% stake in the joint venture will see it share in investment returns, helping support essential services for new and existing residents.

#### **4 Alternative Options Considered**

- 4.1 Members could choose not to endorse the refreshed Business Plan and instruct the Partnership to rework any parts that cause concern. However, as there are no proposed significant amendments to the Business Plan 2020-23 that have not previously been considered and endorsed by Members, it is felt that this would not be easily justified.

#### **5 Supporting Information**

- 5.1 Bracknell Forest Council has a long-standing ambition to secure new development in Bracknell town centre and across the Borough, to promote economic development, enhance vitality, and secure new homes and facilities for residents and businesses. Specifically, the Council Plan 2019-2023 states,

*"We will continue to work hard to make sure that Bracknell Forest continues to thrive, even with the challenges ahead for all sectors of the economy. The Council is committed to continuing the town centre regeneration and over the next four years will deliver the next phases, helping the whole town centre to flourish and grow, providing a rich 18-hour economy."*

- 5.2 Alongside other initiatives, this ambition led to the creation of the Bracknell Forest Cambium Partnership, a Joint Venture with Countryside Properties UK formed to develop Council owned sites in and around Bracknell town centre. The strategic objectives for the JV were determined by the Council, are enshrined in the legal partnership agreement, and included in the JV business plan to clearly show its expected strategic direction, as follows:

- support and help the Council deliver its strategic plan;
- proactively facilitate the physical delivery of the strategic vision for the town centre;
- deliver new commercial and residential uses that support the on-going regeneration of the town centre contributing to economic development, and a balance of daytime and evening trade and activity;
- deliver development of high design quality, setting the bar for further future development;
- enable the provision of affordable residential homes, space for specific commercial occupiers and typologies, and new community facilities to ensure development delivers benefits for all;
- maximise regeneration potential by responding flexibly to each opportunity and leveraging development expertise and resource to identify new opportunities, including with other public sector partners; and

provide long term revenue streams to the Council to support future service delivery and furtherance of the objectives under the Council's strategic plan whilst managing risk exposure per site

- 5.3 The JV business plan sets out the Partnership's planned activities for a period of 3 years from its inception in December 2020 and includes key metrics such as the nature and scale of proposed development activity on individual sites, expected profits and land values and overall financing requirements. More detailed plans are included in individual Site Development Plans for each of the proposed development sites.
- 5.4 As part of the legal agreement between the council and Countryside Properties (UK) Ltd the Delegations Policy sets out the decision-making parameters for the development manager, JV Partnership Board (LLP) and matters reserved to the individual partners. A key principle is that the JV's Business Plan, is required to be reviewed by each partner Annually or as required via each partner's decision making process. This approach means that the Council itself is always able to determine the JV's activities at a strategic level, while more operational decisions are delegated to the JV Partnership Board which has the authority to act within the parameters of the agreed Business Plan and any agreed Site Development Plans. The Partnership Board comprises 3 representatives from each of the partners, with the Council's representatives being the Executive Members for Economic Development and Regeneration and for Transformation and Finance and the Executive Director: Delivery. Any proposed material deviations from the agreed JV Business Plan need to be referred by the JV Partnership Board to the Council and Countryside as partners in the Bracknell Forest Cambium Partnership.
- 5.5 Despite the economic challenged brought by the Covid pandemic and Brexit, the partnership has made good progress against its agreed objectives and priority sites since December 2020. Specifically:
- Planning permission has been secured for 52 homes at Coopers Hill, with development due to commence in Spring 2022 (after conditions have been met).
  - Planning application for Market Street was submitted in July 2021 for 169 homes plus commercial space and is due to be formally considered in February 2022.
  - Exclusivity rights have been awarded for surplus land at the Depot site for a period of 12 months from September 2021, with an initial site development plan due to be submitted for Council approval in Spring 2022.
- 5.6 This progress reflects the strong relationship the Council has built with Countryside since the Bracknell Forest Cambium Partnership was formally established in December 2020. Countryside has recently announced that it will focus all its resources on its market-leading Partnerships business and that it will be recruiting a new Chief Executive following the departure of Iain McPherson. The Council works primarily with the Partnerships South division within Countryside and is reassured that the strategy of the division remains consistent, and it continues to perform strongly. The Partnerships South division of Countryside is led by Mike Woolliscroft who sits on the Cambium Partnership board.
- 5.7 The expected levels of investment and returns for the Council from the planned developments are set out in the confidential section of the JV Business Plan. As previously reported, the Council's equity will be in the form of land and cash, which

will be secured through loan notes. Cash investment will be funded by a combination of internal borrowing and short-term external borrowing if needed. The loan note “premium” (i.e., the margin after offsetting borrowing costs) will be around 2.5% - 3.0%, dependent on borrowing rates at the time.

## **6 Consultation and Other Considerations**

### Legal Advice

- 6.1 Responsibilities for decision making have been agreed by the Joint Venture Partners in the Members’ Agreement dated 23rd December 2020 and are set out in the Delegations Policy which forms part of the Members Agreement. Business Plan approval is a decision reserved under the delegation’s policy to the Individual Partners. From the Council’s perspective this is an Executive decision to be taken by its Executive under its governance arrangements.

### Financial Advice

- 6.2 There are no immediate financial implications arising from this report. The Council’s investment and returns from developments undertaken by the JV are set out in detail in individual Site Development Plans, which are required to be separately considered and approved by Council.

### Other Consultation Responses

- 6.3 Recommendations supported by Bracknell Town Centre Regeneration Committee

### Equalities Impact Assessment

- 6.4 None undertaken

### Strategic Risk Management Issues

- 6.5 Commercial development, by its nature, cannot be risk free. The establishment of a JV with an experienced development partner and the approach set out in the JV Business Plan and associated legal documents strikes a balance between minimising the Council’s risk exposure while allowing it to achieve its regeneration objectives for Bracknell town centre. This approach ensures that the Council is sharing risk and reward with an experienced and successful development partner.

### Climate Change Implications

- 6.6 The Joint Venture is committed to building in an environmentally responsible and sustainable manner. Further information is available in the Partnership’s Sustainable Development Policy

### Background Papers

Annex A JV Business Plan 2020-23 - Reviewed Dec 2021  
Annex B Confidential Financial information  
Annex C Confidential Council investment and Returns Commentary

### Contact for further information

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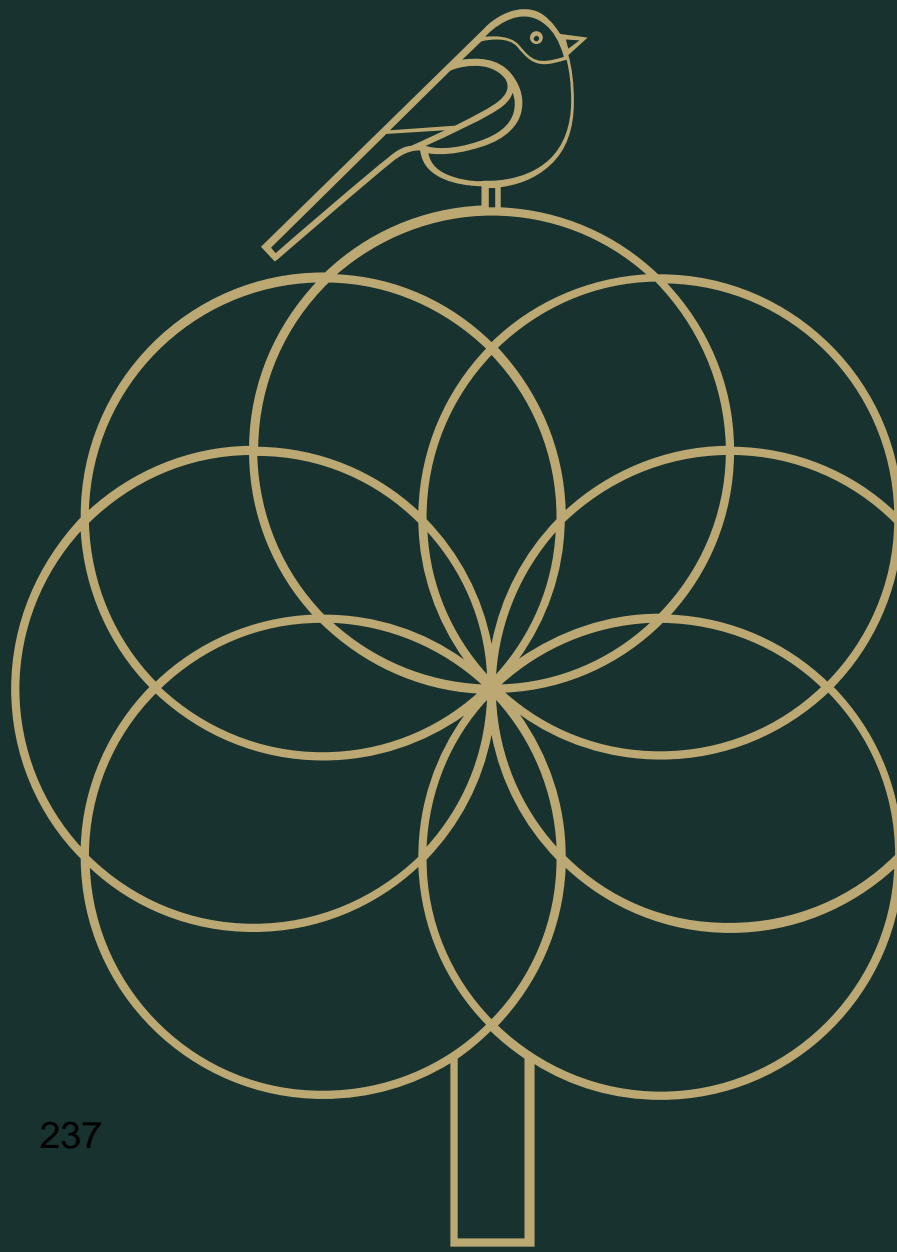
Sarah Holman, JV Business Partner – 01344 354197  
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# Initial Business Plan 2020 - 2023

Annual Review – December 2021





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## 1. Introduction

- 1.1. This document represents the first annual review of the JV Business Plan (as of December 2021) for the Bracknell Forest Development Partnership which sets out the progress made in the period December 2020-December 2021 and outlines any changes for the remainder of this plan. This document also sets out the Partnerships planned activities for the period 2020 to 2023. It provides an approved draft of the Partnership Business Plan which has been appended to the Members Agreement between Bracknell Forest Borough Council (the Council) and Countryside Properties (UK) Ltd (Countryside) in relation to the regeneration and development of multiple sites in Bracknell Forest.
- 1.2. This is the first review by the LLP of the JV Business Plan, the plan will continue to be monitored and updated annually, particularly where land assembly opportunities exist in relation to the sites in this plan.
- 1.3. The Partnership Business Plan remains live throughout the life of the Partnership and will be updated accordingly to reflect the aims of the Partnership Board, as it implements the overarching objectives agreed by the partners. The Partnership Business Plan will be subject to a review no less frequently than every 12 months by the Partnership board and partners.
- 1.4. This annual review (Dec 2021) is a requirement through the Members Agreement which was entered into between the partners upon incorporation of the JV In Dec 2020.

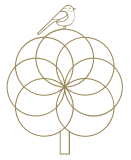
### **December 2021 Progress summary**

The partnership has made significant progress since December 2020 in realising the objectives of the JV on two of the three Category 1 sites, these achievements include planning being granted, subject to S106 for Coopers Hill and a planning submission for Market Street in July 2021. Market Street viability works are continuing to be monitored ahead of settling the Settled Site Development Plan, this is following changes in the Market St design to incorporate electric panel heaters, additional on-site car parking and sewer diversion works.

The partnership has experienced some challenges in market conditions following the constraints brought about by Brexit and increases in build inflation across the sector. The JV has managed to overcome many of these challenges and is still working to deliver the JV objectives and aspirations to programme wherever possible.

On both Coopers Hill and Market Street, the partnership continues to carry out a number of due diligences and workstreams which will allow the delivery of both sites in 2022-2023.

Initial feasibility works and due diligence has also been carried out on a number of potential future opportunity sites for the JV to consider, these sites will hopefully come forward in the next financial period as Initial Development Plans.



## 2. Background

- 2.1. The Council selected Countryside as its development partner following an OJEU Competitive Dialogue procurement process. The Council and Countryside entered into a Members Agreement and related documents which provide an overarching legal structure in December 2020. Individual sites will be drawn down (land enters the JV) once a number of conditions precedent have been met, and a Settled Site Development Plan drawn up and approved. Details of the decision-making process and obligations of each partner are contained within the Members agreement and subsequent legal documents.

## 3. Partnership Objectives

### Principal Purpose

- 3.1. The principal purpose of the Partnership is to lead on the regeneration of the three sites identified by the Council at tender stage (the Category 1 Sites) for mixed use development, and to bring forward additional sites for regeneration in accordance with the Bracknell Town Centre Vision 2032. The Partnership will not be restricted to sites in the Bracknell Town Centre Vision 2032, and both partners will have the ability to bring forward potential sites for review across the whole of Bracknell Forest.
- 3.2. There are a number of overarching project objectives and parameters:
- support and help the Council deliver its strategic plan;
  - proactively facilitate the physical delivery of the strategic vision for the town centre;
  - deliver new commercial and residential uses that support the on-going regeneration of the town centre contributing to economic development, and a balance of daytime and evening trade and activity;
  - deliver development of high design quality, setting the bar for further future development;
  - enable the provision of affordable residential homes, space for specific commercial occupiers and typologies, and new community facilities to ensure development delivers benefits for all;
  - maximise regeneration potential by responding flexibly to each opportunity and leveraging development expertise and resource to identify new opportunities, including with other public sector partners; and
  - provide long term revenue streams to the Council to support future service delivery and furtherance of the objectives under the Council's strategic plan whilst managing risk exposure per site.



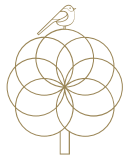
### **Developing the business**

- 3.3. The Partnership aspires to deliver exceptional regeneration and community outcomes across Bracknell, acting as a catalyst for sustainable growth and economic development. Business development. Activity will focus on maximising the social and economic benefits, on the Category 1 Sites as well as all Future Opportunity sites which may be added into the regeneration portfolio at a later date.
- 3.4. Business development activity will be championed by all individuals in the Partnership, including the Partnership Board.
- 3.5. The Partnership will apply a framework approach to the development of proposals for all sites, in-keeping with the project objectives above, utilising the following key criteria:
  - Regeneration Outcomes
  - Sustainability (updated)
  - Viability
  - Profitability
  - Deliverability
  - Innovation
- 3.6. Business development activity will recognise the importance of social values and the contribution the development projects make to the economic growth of the Borough and the surrounding area.

### **December 2021 – 2023 Project Objectives**

- 3.7. The partnership intends to build on the significant progress it has made in the last annum, some of the key objectives for the upcoming period are:
  - Commencing construction under licence at Coopers Hill to deliver 13 high quality affordable homes and 39 private for sale homes to Bracknell town centre
  - To enter into the Settled Development Plan for Coopers Hill and drawdown the freehold shortly afterwards in March 2022 whilst continuing to construct the project and work with stakeholders
  - Maintain frequent engagement with site specific and wider stakeholders
  - Obtaining a resolution to grant for the Market Street planning application and commencing construction works shortly afterwards in early 2022
  - Bringing forward an Initial Site Development Plan for the Depot Site followed by the submission of a successful planning application
  - Supporting public sector funding and helping to deliver OPE spend on appropriate regeneration sites
  - Engaging with the Council and inputting into the town centre masterplan workstreams





- Working with the Council to bring forward the Southern Gateway and Eastern Quarter development sites for the LLPs consideration and delivery
- Continuing to contribute to the successful transformation of the town centre and providing the necessary purpose-built new homes and facilities that are needed
- Providing socio-economic benefits to the local area and creating places that enhance the local economy for Bracknell Forest and its residents.

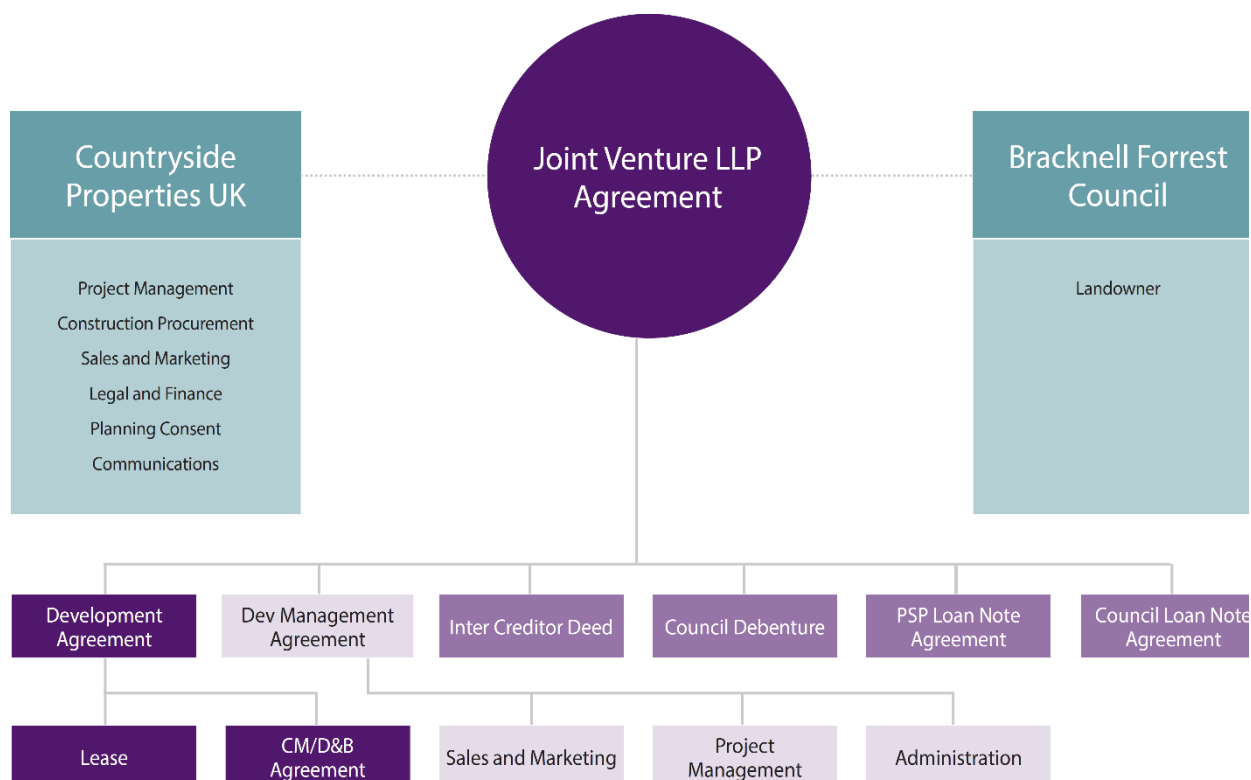


Market Street CGI 1



## 4. Governance & Management

### Partnership Structure



4.1. The Partnership is structured on the principles of equal sharing by the Partners of risk and reward. The Partnership will act as the developer of the projects designed to deliver this Partnership Business Plan with parity between the Partnership members.

### Partnership Board

4.2. The delivery of the project is governed by the Partnership Board which comprises the following three Council representatives and three Countryside representatives. As at signing of the Members' Agreement the representatives are as follows:

4.3. Council Representatives

- Councillor Marc Brunel-Walker, Executive Member for Economic Development and Regeneration
- Councillor Peter Heydon, Executive Member for Transformation and Finance
- Kevin Gibbs, Executive Director: Delivery



#### 4.4. Countryside Representatives

- Mike Woolliscroft, CEO, Countryside Partnerships South
- Daniel King, MD, Countryside Partnerships West London & Thames Valley
- Simon Cowley, Head of Finance, Countryside Partnerships West London & Thames Valley

4.5. The Chair of the Partnership Board shall alternate between a Council Representative and a Developer Representative every year. For this first year (2021) Chair is held by Countryside Properties.

4.6. The Partnership Board will meet as a minimum on a two monthly basis for the first year and quarterly thereafter, or as otherwise agreed.

4.7. Countryside will prepare and circulate papers for review by the representatives seven days prior to each meeting.

4.8. The role of the Partnership Board is summarised as follows:-

- Develop, give guidance on, discuss and refine Site Development Plans, the Financial Model, Site Values and Partnership Return Reports and refer such Site Development Plans to the Partnership members;
- Review and manage performance against the KPI's and the delivery of the Project as against the overarching Development and Phasing Programme;
- Propose amendments to the Partnership Business Plan and/or a Site Development Plan or any part thereof;
- Maintain and review the Partnership risk register;
- Agree further (or Site specific) KPI's; and
- Approvals and recommendations as per the delegation's policy.

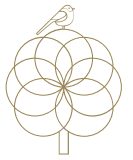
#### **Steering Board**

4.9. The delivery of the project will be supported by an advisory Steering Board, which comprises an equal number of representatives appointed by each member, with subject matter experts participating as appropriate.

4.10. The role of the Steering Board is summarised as follows:-

- To support the Council and Countryside decision making processes in order for all internal approval mechanisms for the Council and Countryside to be satisfied.
- To guide the strategic vision and timescales for other potential development sites which may be included in the immediate and medium term
- To advise on any amendments to the Partnership business Plan prior to agreement at LLP Board
- To advise, discuss and consider general matters pertaining to the LLP as laid out in the Partnership Delegations Policy





### **Project Team & Project Management**

- 4.11. Countryside are appointed as Development Manager, will establish a project team to deliver the project, led by the Managing Director and supported by development, technical, procurement, construction, sales and marketing and customer services expertise.
- 4.12. Countryside will act as Principal Designer under CDM Regulations 2015.
- 4.13. Countryside's in-house resource will be supported by external consultant, sub-contract and supplier appointments.
- 4.14. Countryside will work closely with the Council's Property Team and Programme Director through all stages of the Development. A project meeting will be held on a monthly basis covering key project issues. Further sub-group meetings will be held as required focussing on specific issues such as programme, communications, design and viability.

### **Decision Making**

- 4.15. Arrangements and responsibilities for decision making have been agreed by the Partners in the Members' Agreement dated 23rd December 2020 and are set out in the Delegations Policy which forms part of the Members Agreement.
- 4.16. This identifies which decisions are to be made by the Partners, the Council and Countryside, individually, which ones can be made by the Partnership Board, what authority the Development Manager has and on which matters he needs to consult the Steering Board before making a recommendation.
- 4.17. The Delegations Policy can be amended by agreement of both Partners.
- 4.18. The matters which require decisions by both Partnership members to be made individually include:
  - Alteration of the Objectives of the Partnership, changes to the structure or Membership of the Partnership and changes to the Partnership legal agreements;
  - Approval of the Business Plans for the Partnership and individual sites (Site Development Plans);
  - Any decisions which are outside the approved Site Development Plans, e.g. disposals, lettings or expenditure which is more than £400,000 in excess of the Site Development Plan budgets;
  - Approval of contracts involving significant expenditure, above £400,000 except where specifically included in the Site Development Plan;
  - The distribution of Partnership funds or taking out of loans unless explicitly agreed in the Members' Agreement.



## 5. Partnership Working and Stakeholder Engagement

5.1. The following narrative sets out the approach to partnership working between the Partners and wider stakeholders through active engagement and consultation. In accordance with the Members Agreement, the Partners each commit to the certain partnering principles as set out in the Members Agreement including the following:

- At all times to carry out their duties as a Partner observing the highest standards of efficiency, economy and integrity;
- At all times to act in good faith towards and co-operate with each other and the Partnership in connection with the Project Agreements;
- Notifying the Partnership and each Partner immediately on becoming aware of any matter which it considers is likely to materially affect the Partnership and/or relevant Partners or their business;
- To act in a manner consistent with the Project Agreements.

### **Bracknell Forest Local Plan**

5.2. Planning policy and guidance documents which are to be addressed in the Partnership proposals is contained in the following documents:

5.3. Development Plan:

- Core Strategy (2008)
- Site Allocations Plan (2013)
- Bracknell Forest Borough Local plan, saved policies (2002)
- Bracknell Forest Policies Map (2013)
- South East Plan (saved policy NRM6 (TBHSPA))

5.4. Emerging Plan:

- Emerging Local Plan (adoption anticipated early 2022). The Draft Local Plan sets the long term spatial vision and development strategy for the borough up to 2036 and once adopted will replace the saved Local Plan policies (2002) and the Core Strategy (2008).

5.5. Supplementary Planning Documents (SPD) (of relevance):

- Design SPD
- Character Areas SPD
- Designing for Accessibility SPD
- Parking Standards SPD
- Planning Obligations SPD



- Streetscene SPD
- Sustainable Resource management SPD  
TBHSPA SPD
- To note the council is commissioning master plans for Eastern and Southern areas of the town centre which will be implemented as SPD documents in mid-2022.

5.6. The Local Plan Objectives that were used to develop the initial proposals at bid stage can be summarised as follows:

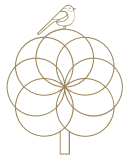
- Take a positive and proactive approach;
- Protect and where possible enhance existing assets;
- Support economic growth and resilience to create a vibrant and thriving town centre;
- Provide an appropriate level of development and supply;
- Capitalise on the re-invigoration the town's recent retail developments have provided;
- Build strong communities;
- Create high quality sustainable developments and appropriate related infrastructure;
- Make use of the town's transport and other infrastructure.
- Consideration of BREEAM will be made in each site business plan

### **Planning Strategy**

- 5.7. The success of the planning strategy is reliant on a collaborative approach between the Developer, the Council acting in its statutory capacity as Local Planning Authority and other interested parties.
- 5.8. Each site will be the subject of its own individual planning strategy and planning application, considering stakeholder interest and engagement.

### **Communication, Local Engagement and Consultation Strategy**

- 5.9. Local engagement and consultation with key stakeholders and the community is an integral part of the success of the Partnership and will be undertaken in accordance with the Partnership's Objectives. The Partnership will take an active role, through engaging and being involved in events that seek to shape the regeneration in Bracknell.
- 5.10. The Partnership will involve local residents and community groups as part of the statutory planning consultation process in addition to wider opportunities to connect and respond to the needs of the local community. This will include the Partnership engaging with relevant landowners and stakeholders, investigate feasibility / viability study and acquire land and interests to identify new opportunities to create the town centre vision.
- 5.11. The Partnership will liaise with existing and new investors in the town centre and co-ordinate the efforts of the Partnership in ensuring all is in keeping with the Partnership's strategy and objectives.



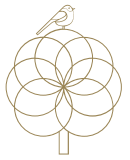
5.12. The Partnership will actively raise its profile and credibility in the local area to facilitate the successful delivery and performance of the regeneration project through the following measures:

- An active PR and marketing campaign as required
- Proactively campaigning about the success of the Town Centre Regeneration
- A co-ordinated programme of communications/press releases
- Creating and maintaining a website presence for all stakeholders to easily access
- Local engagement, sponsoring community initiatives/charities

5.13. Communications and engagement activity planning will be contained in the communications and engagement plan at Appendix 2 which covers the period August 2021 – Feb 2022. This will be reviewed periodically as part of LLP board activities.



Coopers Hill CGI 1



## 6. Development Opportunities

- 6.1. Development opportunities will be reviewed in line with the updating of the Partnership Business Plan or in accordance with the requirements of the Partnership Board from time to time.
- 6.2. A tranche of three sites was initially included within the scope of Partnership, and these were anticipated to form the first three developments carried out by the partnership.

### **Identified Sites from Tender / Other Short Term Opportunities**

- 6.3. The following Category 1 Sites are those initially identified. All sites are wholly owned by the Council and therefore not subject to third party land interests.
  - Coopers Hill
  - Market street
  - Jubilee Gardens
- 6.4. As of July 2021, these sites benefit from vacant possession, with title conditions to be discharged subsequently for each site under the Development Agreement.
- 6.5. The below demonstrates the site strategies and progress since the partnership was incorporated in December 2020.
  - Market Street – apartment led scheme of 169 units, with opportunity for a significant area of commercial / non-residential use. Planning submitted July 2021.
  - Coopers Hill – low density, 52-unit housing led scheme. Resolution to grant achieved in August 2021, subject to S106. Likely start on site is anticipated for January 2022 subject to S106.
  - Jubilee Gardens – apartment led scheme, with active ground floor commercial usage Jubilee Gardens will now form part of the Southern Gateway master planning and thus may fall out of the 3-year JV business plan if agreed by JV partners.
  - The council approved exclusivity to the partnership to bring forward an Initial Site Development Plan for The Depot Site for consideration. This exclusivity runs from October 2021-October 2022





- 6.6. Within the next three years, the Partnership will also commence feasibility study work on the following sites.
- Southern Gateway (will form part of master planning work undertaken by the council)
  - Eastern Quarter (will form part of master planning work undertaken by the council)
- 6.7. The Partnership will further develop these opportunities and any others which may be identified during this period via detailed design and formal consultation with the Local Planning Authority. An individual site appraisal will be prepared and submitted for approval by the Partnership Board prior to commencement of works.



Coopers Hill CGI 2

### **Additional Development Opportunities**

- 6.8. Over and above the initial sites identified, the Council have identified a number of other development opportunities for the short and long term within the Bracknell Town Centre Vision 2032, which may be brought forward through the Partnership.
- 6.9. This is based primarily on land controlled by the Council but also considers opportunities relating to third party controlled land. An extract of the short, medium and long term sites identified is below.



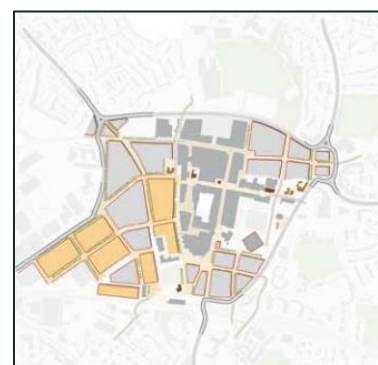
### Short term

- Identifying and unlocking key sites with immediate development potential, including Easthampstead House
- Catch and steer on emerging projects to align with future vision
- Develop meanwhile opportunities on fallow sites



### Medium term

- Deliver highway changes which unlock further sites and complete the street network
- Re-provide the bus interchange facility as on-street provision to release the bus station site
- Complete initial phases of development



### Longer term

- Opportunity to extend the developing street network to the west, integrating the Peel Centre and connecting the western industrial area more closely into the town centre

Extract from Bracknell Town Centre Vision 2032: Published by Bracknell Forest Council

- 6.10. The activities of the Partnership will not be limited to those opportunities identified in The Town Centre Vision 2032, and the Partnership will actively explore other suitable development opportunities, including suitable sites elsewhere in Bracknell Forest.

### Community Works Projects

- 6.11. Community facilities bring much needed variety to the regeneration of a town centre and will be an important part of future development across all of Bracknell. Delivery of community works will strengthen the Town Centre Vision and Partnership Objectives, clearly supporting our 'One Vision: One Community' ethos and ongoing regeneration of Bracknell.
- 6.12. Each opportunity will need to be assessed on an individual basis as each site will present different benefits and challenges. It is anticipated that the Council will present opportunities to the Partnership in the form of a development brief, which will outline the details of the site and development potential.
- 6.13. The Partnership will initially undertake a feasibility study based on this development brief and put forward a recommendation to the Council based on the findings of the study.
- 6.14. Following the presentation of the feasibility study, there would be a review period whereby the Council would review the feasibility and viability of the opportunity and determine whether to take the project forward.
- 6.15. The procurement and build contract route for any community works programmes will be determined on their individual merits and will be presented in a summary site proposal.



6.16. At present, no Community Works projects have been identified, however this will remain under constant review.

### Development and Phasing Programme

6.17. The Partnership anticipates that the three identified Category 1 Sites will be brought forward in accordance with the following outline programme:

- Coopers Hill – Commence Design in late 2020, with a target of receiving planning permission and start on site in 2021. **Achieved**
- Market Street – Commence Design in 2021 (achieved), with a target of receiving planning permission in 2021. **Broadly on programme (application submitted July 2021)**
- Jubilee Gardens / Southern Gateway – Proceed with assessment of land assembly / re-provision of existing uses in summer 2022 ahead of detailed design work. **Ongoing**

6.18. In addition to the Category 1 sites, initial feasibility work has been undertaken on the Depot Site with an initial site development plan scheduled for LLP consideration in 2022.

6.19. Furthermore, the partnership will actively seek to bring additional sites forward for development, either in connection with the above identified sites or as standalone developments.

6.20. The LLP's anticipated milestones for identify additional sites that can come into the partnership during 2022/23 are:

- Depot Site Initial Development Plan Summer 2022
- Town Centre Masterplanning Concept Summer 2022
  - a. Southern Gateway (Inc Jubilee Gardens) Summer 2022
  - b. Eastern Quarter Summer 2022

## 7. Vacant Possession Strategy

7.1. Land for inclusion into the Partnership business plan sites has been identified as Market Street, Coopers Hill and Jubilee Gardens. This land is in the ownership of the Council. For these sites, and vacant possession has been achieved Details are contained within the Council's internal vacant possession strategy.

7.2. Timescales for vacant possession are as follows:

- Market Street – July 2021 achieved
- Coopers Hill – August 2021 achieved
- Jubilee Gardens – Vacant site
- Depot Site - Surplus Land (subject to Initial Site Development Plan)





- 7.3. For land not included in this business plan, and prior to land drawdown into the Partnership, the Council will agree with the Partnership a site by site decanting strategy including timescales and including consultation proposals, if not already considered. There are wider opportunities adjacent to these sites for land assembly. Where land is not in the ownership of the Council and land assembly is required it shall be a Partnership responsibility for ensuring negotiation of vacant procession of those sites.
- 7.4. The Council agrees, prior to land drawdown into the Partnership, that it will take such steps as are reasonably necessary to put before elected members a proposal to exercise the Powers of Appropriation, but only so far as necessary and/or expedient to facilitate the carrying out of the Development. The use of such powers will be at members' discretion.
- 7.5. The Council agrees that it will make all reasonable and commercially sensible endeavours to release any existing covenants and wayleaves held over any parcel of land, prior to that land being drawn down into the Partnership.

## 8. Affordable Housing Policy

- 8.1. The Council's borough-wide target for affordable housing and the aim of seeking to secure the provision of good quality, affordable housing for local people in balanced, integrated and sustainable communities will be applied. Current Policy is to seek provision up to 25% of net new homes to be affordable, subject to viability, of which: 70% to be affordable rent 30% to be intermediate housing.
- 8.2. The draft Bracknell Forest Local Plan Part 1 – Revised Growth Strategy - Section 6 –Policy LP8 – seeks 35% affordable housing on qualifying sites with a tenure split of 70% affordable rent and 30% intermediate housing and is likely to be adopted by Spring 2022.
- 8.3. Developments will be policy compliant at the date of planning application submission subject to viability and mutual agreement by JV partners.

## 9. Supply Chain Procurement

- 9.1. The principles that will be applied to procure construction works and all other goods and services for the development have been agreed by the Partners and are contained in a detailed Procurement Policy in the Members Agreement. The objectives of the policy are to:
  - Secure value for money in relation to the procurement of goods, works and/or services by adhering to best practice principles;
  - Ensure fairness and equality of opportunity in the treatment of all contractors;
  - Drive innovation and adhere to the principles of sustainable procurement
  - Enable local contractors and suppliers to have a chance of securing new business;
  - Adhere to the Council's planning and other relevant policies.



## 10. Financial Appraisal

- 10.1. The financial section is Commercial in Confidence and provided with the financial appraisal in the appendices.
- 10.2. The financial appraisal is based on market conditions as at Q4 2021 and will remain under review throughout the life of the Partnership. A detailed review of projected revenues and costs will be undertaken by the Partnership board ahead of land draw down for each of the individual sites.
- 10.3. Based on initial financial reviews, which are subject to planning permission being granted, the Category 1 sites deliver a land value to the council of c.£2.9m, excluding any allowance for inflation.
- 10.4. The peak level of investment by the Council and Countryside for the delivery of the category 1 sites is estimated to be between £16m and 18m, including land value, for each partner. This is fully repaid by the partnership prior to completion of the developments. The addition of further sites may change this peak. Any Council funding will be matched in cash 1:1 by Countryside. This will be reviewed by the Partnership board prior to any additional land draw down / acquisition by the partnership something about other than as laid out in the Coopers Hill site development plan. Details are in within the confidential appendices.

## 11. Funding Strategy

- 11.1. The Partners agreed approach, set out in Schedule 7 to the Members Agreement, is to fund the initial sites using matched Partnership members' loans provided by the Council and Countryside which are drawn down and repaid as required.
- 11.2. It is proposed that as each subsequent site is brought forward, it should be agreed between parties how the site should be funded by reference to a financial model. Should the parties agree that third party debt ought to be used then a process to identify and procure the most efficient source of third-party financing will be undertaken.
- 11.3. This will be approved by the Partnership Board prior to commencement of works.

## 12. Policies & Procedures

- 12.1. The Partnership has adopted the policies of the Council and Countryside in respect of Social Value; Health and Safety; Quality Management; Sustainability; and Equal Opportunities where the policies of both Partners align. These can be found on the Cambium Partnership website, the URL link can be found at the end of this document.
- 12.2. Where the Partners' policies do not align, the Partnership will adopt a policy which coincides with the aims and objectives of the Partnership. These policies will be reviewed and agreed by the Partnership board.

## 13. Social Value

- 13.1. Social Value objectives will be monitored throughout the project. The Partnership will work towards delivering the initial social value outcomes which can be found in Appendix 9 which can be found on the Cambium Partnership website, the URL link can be found at the end of this document .



### 14. Environmental Management & Sustainability

- 14.1. The objectives and policies for the management of environmental and sustainability measures are expressed in appendix 9 which can be found on the Cambium Partnership website, the URL link can be found at the end of this document. Countryside as principle designer actively pursue a policy of promoting and implementing sustainable development as agreed with the Local Planning Authority.
- 14.2. As part of the planning application, each site will have a sustainability statement outlining the measures taken to support the sustainability policy.
- 14.3. Both members of the partnership have both individually and collectively committed to driving sustainability. Bracknell Forest Council have committed to becoming carbon neutral by 2050 through the adoption of a Climate Change Strategy in March 2021. Countryside Properties have also set out a pathfinding approach to producing carbon net zero homes by 2030.
- 14.4. The partnership will also focus on wider issues of sustainability such as:
  - Jobs: promoting local skills and employment
  - Social: Creating healthier, safer and more resilient
  - Environment: Protecting & improving our environment
  - Innovation: Promoting social innovation in our communities
- 14.5. Key sustainability features within the proposed developments will include measures such as; waste and recycling facilities, the use of sustainable materials where practical, sustainable procurement policy, biodiversity and ecology, promotion of sustainable transport and mitigating congestion, electric vehicle parking provisions, energy efficient home appliances and water efficiency measures.

### 15. Quality Management

- 15.1. The Partnership and Countryside's aims as development and construction manager is to ensure that its products, services and operations meet the needs of its customers and other interested parties at all times. To achieve this, the LLP is committed to its vision, values and its objectives which are set out in the appendices below

### 16. Partnership Risk Register

- 16.1. Effective risk identification and management is an essential business process of the Partnership. The Partnership Board will be responsible for identification, assessment and management of the key business risks and will take an acceptable approach to risk in the context of achieving expected returns and the Objectives as set out in the Partnership Agreement.
- 16.2. A Partnership Risk Register is in place for the Partnership and is enclosed within the Members Agreement. This provides an overarching risk management tool, consolidating risk management best practice and risks potentially arising at both Partnership and at Site Business Plan level.



- 16.3. The Partnership Risk Register is compiled on the basis of the key political, economic, social and technological factors that are deemed to be of relevant to achieving the
- 16.4. Objectives, having regard to the particular nature of the Partnership's Business and the particular threats, and related mitigation measures, to which the Partnership may be exposed to from time to time. As such it is a dynamic tool, which will be reviewed by the Board on a regular basis.
- 16.5. This document will be maintained by Countryside and included in the papers issued ahead of each board meeting.

## 17. Health & Safety Management

- 17.1. H&S Management is at the forefront of all daily activities. The purpose of this policy is to promote a pro-active approach in the prevention of accidents, ill-health and injury in the workplace as set out in the appendix 7 which can be found on the Cambium Partnership website, the URL link can be found at the end of this document.

## 18. Equal Opportunities

- 18.1. The partnership between Bracknell Forest and Countryside Properties endeavours to implement equal opportunities across all areas of the Partnership. This can be found in our full policy attached in Appendix 8 which can be found on the Cambium Partnership website, the URL link can be found at the end of this document.



Market Street CGI 2

# Appendices

Appendices can be found on the Cambium Partnership website through the following URL;  
[cambiumpartnership.com](http://cambiumpartnership.com)





## Appendix 1: Location Plan





Appendix 2: JV Risk Register

[www.cambiumpartnership.com](http://www.cambiumpartnership.com)







**Legend**  
 Cat 1 Sites

**Sites**  
 1, Market Street  
 2, Jubilee Gardens  
 3, Coopers Hill

**Scale 1:3000**



Market Street



Jubilee Gardens



Coopers Hill





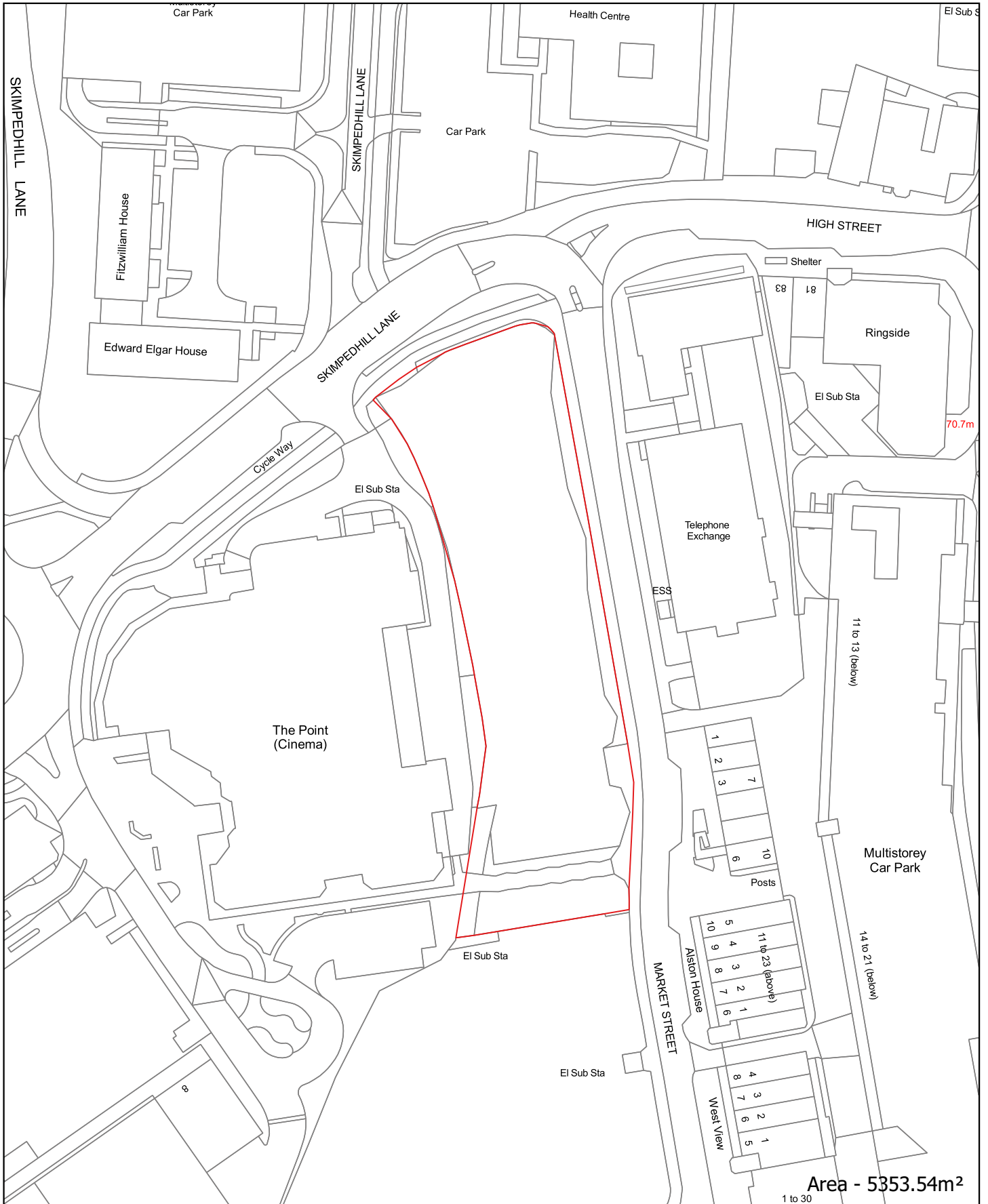
# Category 1 & 2 Town Centre Sites



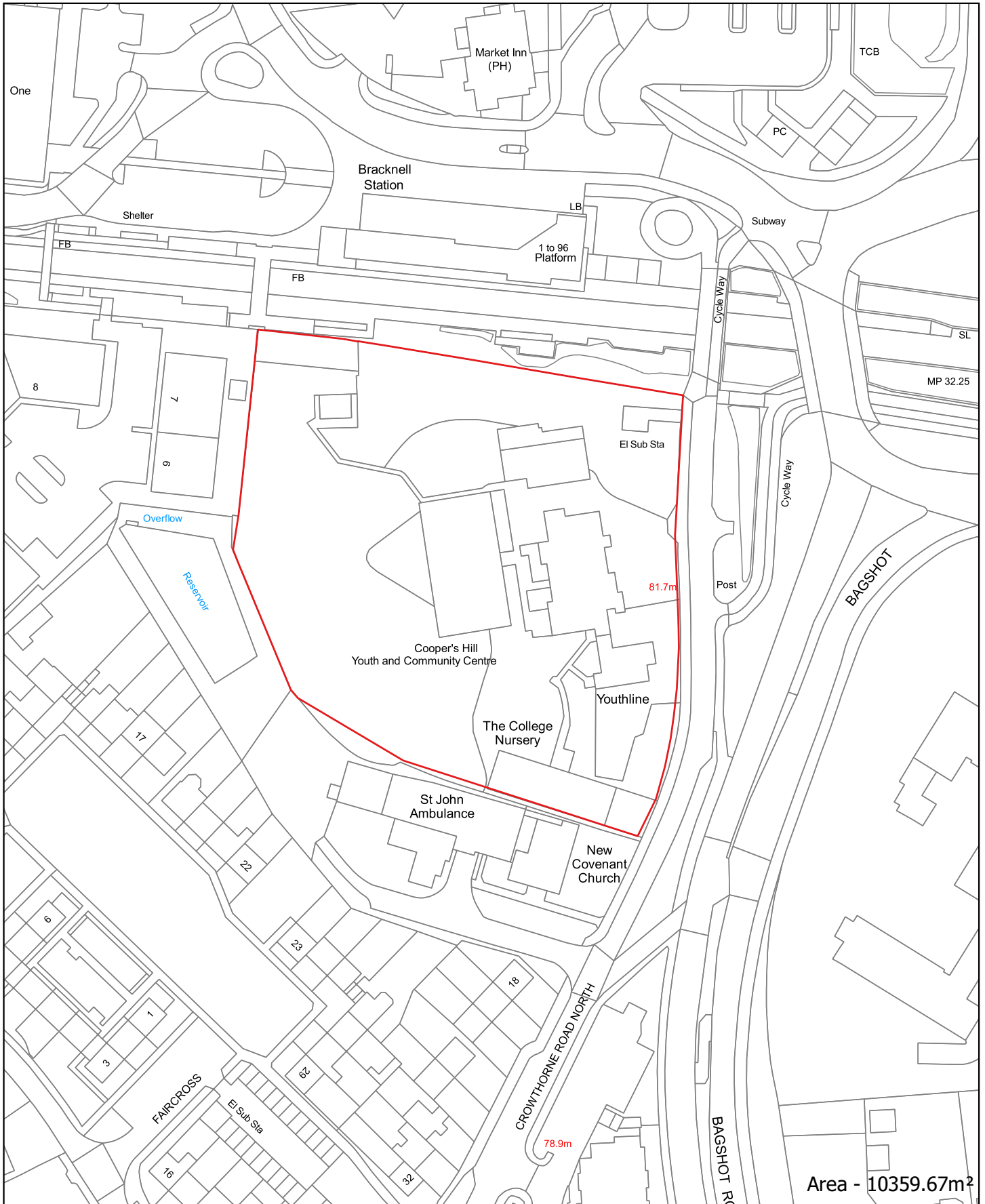
Scale 1:3000



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## Initial Equalities Screening Record Form

<b>Date of Screening:</b> 22/09/2021	<b>Directorate:</b> Children, Young People Directorate	<b>Section:</b> Children's Social Care (Specialist Support)	
<b>1. Activity to be assessed</b>	The tendering for provision of a targeted scheme for Holiday and Saturday clubs for children with disabilities		
<b>2. What is the activity?</b>	<input type="checkbox"/> Policy/strategy <input type="checkbox"/> Function/procedure <input type="checkbox"/> Project <input type="checkbox"/> Review <input checked="" type="checkbox"/> Service <input type="checkbox"/> Organisational change		
<b>3. Is it a new or existing activity?</b>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Existing		
<b>4. Officer responsible for the screening</b>	Bosede Lawal, Commissioner		
<b>5. Who are the members of the screening team?</b>	Manjit Hogston, Commissioning Manager (Children) Bosede Lawal, Commissioner Fong Chin, Assistant Commissioner EIA will be shared with DMT members.		
<b>6. What is the purpose of the activity?</b>	Provision of Short Breaks is a Statutory Duty. The Breaks for Carers of Disabled Children Regulations (2011) placed a duty on Local Authorities to provide short breaks to children and young people with disabilities and their families. The procurement process will ensure that the tendering process and services commissioned by the Council, adhere to obligations of openness, fairness and obtain best value.		
<b>7. Who is the activity designed to benefit/target?</b>	Children with disabilities living in Bracknell Forest and their parents and carers. There are currently 135 CYP accessing this service.		
<b>Protected Characteristics</b>	<b>Please tick yes or no</b>	<b>Is there an impact?</b> What kind of equality impact may there be? Is the impact positive or adverse or is there a potential for both? If the impact is neutral please give a reason.	<b>What evidence do you have to support this?</b> E.g equality monitoring data, consultation results, customer satisfaction information etc Please add a narrative to justify your claims around impacts and describe the analysis and interpretation of evidence to support your conclusion as this will inform members decision making, include consultation results/satisfaction information/equality monitoring data
<b>8. Disability Equality – this can include physical, mental health, learning or sensory disabilities and includes conditions such as dementia as well as hearing or sight impairment.</b>	Y	The tender process and eventual contract award are designed to positively impact on children with disabilities.  It will specifically support children and young people with disabilities to enable them to have the same opportunities as any other child.	Data collected supports the need for this type of service because of the range of disabilities identified. Case studies and feedbacks collected as part of contract monitoring shows that CYP with complex disabilities are supported in their development. Some of feedback include, " X has grown in independence throughout her time at Kids and now chairs her own CiN meetings and is a charming and confident young lad"y.

			These targeted schemes are necessary to meet the needs of children with disabilities and their families - any reduction in the targeted Holiday and Saturday schemes; would have a significant adverse impact.	"These sessions provides our child to be able to be independent, seeing other children, socialising and enhances their communication/people skills"
<b>9. Racial equality</b>		N	Positive impact - supports all children.	There is mixed ethnicity data but 79.31% are White British, 18.97% are in minority groups. Whilst we do not have data for 1.72%. It is worth noting that referrals are not screened based on gender, religion and or sexual orientation. CYP and their families are accepted on the scheme because of their disability needs and age (e.g under 18) only The tender/contract will impact equally across these group.
<b>10. Gender equality</b>		N	Positive impact - supports all children.	72% of current users are male; 28% female. The tender/contract will impact equally across this group.
<b>11. Sexual orientation equality</b>		N	Positive impact - supports all children.	No data available The tender/contract will impact equally across this group.
<b>12. Gender re-assignment</b>		N	Positive impact - supports all children.	No data available The tender/contract will impact equally across this group.
<b>13. Age equality</b>		N	Positive impact - supports all children.	Children range from 4-18 years of age The tender/contract will impact equally across this group.
<b>14. Religion and belief equality</b>		N	Positive impact - supports all children.	No data available The tender/contract will impact equally across this group.
<b>15. Pregnancy and maternity equality</b>		N	Not Applicable	
<b>16. Marriage and civil partnership equality</b>		N	Not Applicable	
<b>17. Please give details of any other potential impacts on any other group (e.g. those on lower incomes/carers/ex-offenders, armed forces</b>			These activities are priced in line, but slightly lower, than mainstream equivalents and thus accessible by all socio economic groups. Bursary funding can be available from current providers and the LA would support via the short breaks inclusion fund, where there is evidence that poverty was a barrier to access. Ensuring that low income families are not disadvantaged.	

communities) and on promoting good community relations.			
18. If an adverse/negative impact has been identified can it be justified on grounds of promoting equality of opportunity for one group or for any other reason?	No adverse impact identified		
19. If there is any difference in the impact of the activity when considered for each of the equality groups listed in 8 – 14 above; how significant is the difference in terms of its nature and the number of people likely to be affected?	<p>The protected characteristic groups listed in 8 -14 are not discrete communities, for example, a child or young person could fall into more than one category.</p> <p>The evidence above are key areas of consideration for commissioner and provider to ensure that the planning and delivery of the service is done in a way that avoids negative impact on protected characteristics.</p> <p>There are currently 132 CYP that currently access the Short Breaks Service that would be positively impacted.</p>		
20. Could the impact constitute unlawful discrimination in relation to any of the Equality Duties?		N	The activity is promoting greater equality and inclusion.
21. What further information or data is required to better understand the impact? Where and how can that information be obtained?	<p>Data is provided by the existing provider on a a quarterly basis. Feedback is gathered from families by the providers. The contract is monitored and report provided on a 6 monthly basis with established Key Performance Indicators (KPI). This informs areas that may require future focus.</p> <p>Parent reps will be invited to be involved in the tendering process and communication exchange will take place at regular intervals with the parent forum.</p>		
22. On the basis of sections 7 – 17 above is a full impact assessment required?		N	<p>Please explain your decision. If you are not proceeding to a full equality impact assessment make sure you have the evidence to justify this decision should you be challenged.</p> <p>This is a long running provision that has been instrumental in raising the participation of children and young people with complex needs in rewarding activities and supports inclusion in the local community.</p>
23. If a full impact assessment is not required; what actions will you take to reduce or remove any potential differential/adverse impact, to further promote equality of opportunity through this activity or to obtain further information or data? Please complete the action plan in full, adding more rows as needed.			
Action	Timescale	Person Responsible	Milestone/Success Criteria
To align parental contribution with mainstream equivalents		Bosede Lawal	Increase of parental contribution

<p>To procure a provider that is aware and proactive around equalities, diversity and inclusion.</p> <p>The EIA screening form will be shared with the preferred provider to ensure understanding of the commissioners' expectations around equalities and plan for their proposed service.</p> <p>The contract KPIs and spec will be reflective of the commissioners' ambition to procure a service that is sensitive and responsive to different protected characteristics.</p>	<p>February 2022 – August 2022</p>	<p>Bosede Lawal</p>	<p>Successful award of the contract</p>
<p>Undertake contract monitoring throughout the life of the contract</p>	<p>September 2022 onwards</p>	<p>Bosede Lawal</p>	<p>Commissioners re-assured through contract monitoring processes that the provider delivers fair and inclusive services</p>
<p><b>24. Which service, business or work plan will these actions be included in?</b></p>	<p>Already included as part of the Children Commissioning Team's work plan</p>		
<p><b>25. Please list the current actions undertaken to advance equality or examples of good practice identified as part of the screening?</b></p>	<p>Please list</p> <p>E&amp;D performance reviewed with current contract for potential impact to protected characteristics.</p> <p>Parent and Carer forums are consulted around Short Breaks and are invited to feedback on the service</p>		
<p><b>26. Assistant director's signature.</b></p>	<p>Signature:</p>		<p>Date:</p>