

Public Document Pack

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A meeting of the **Cabinet** will be held in Virtual on **Tuesday 8 December 2020** at **9.30 am**

MEMBERS: Mrs E Lintill (Chairman), Mrs S Taylor (Vice-Chairman), Mr R Briscoe, Mr A Dignum, Mrs P Plant, Mr A Sutton and Mr P Wilding

SUPPLEMENT TO AGENDA

5 **Financial Strategy and Plan 2021-22 to 2025-26** (Pages 1 - 24)

Appendices 1, 2, 3 and 4.

Please note that appendix 2 is an exempt appendix and is therefore not publically available.

6 **Draft Revised Contaminated Land Strategy** (Pages 25 - 47)

Appendix.

7 **Determination of the Council Tax Base 2021-2022** (Pages 49 - 52)

Appendices 1 and 2.

9 **Homelessness Prevention and Relief Fund** (Pages 53 - 55)

Appendix.

13 **Future Customer Services Delivery** (Pages 57 - 69)

Appendices 1, 2 and 3.

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Financial Strategy

Introduction

The Council's Corporate Plan 2018-2021 was last approved by Council on 23 January 2018. The plan sets out the Council's priorities that represent the challenges and opportunities facing the District Council over the medium term.

Whilst the local elections in May 2019 have changed the political makeup of the Council, the corporate priorities remain unchanged and relevant. The biggest global event that has had a significant impact on the Council is the coronavirus pandemic. Since March 2020, this has had a major impact on service demand and delivery, and the Council's own financial position. Cabinet, Overview and Scrutiny and Council have received regular reports setting out the recovery plan and the way forward for the Council's financial planning.

Extract from Approved Corporate Plan

The Priorities are to:

- Improve the provision of and access to affordable housing;
- Support our communities;
- Manage our built and natural environments to promote and maintain a positive sense of place;
- Improve and support the local economy to enable appropriate local growth; and,
- Manage the Council's finances prudently and effectively.

Each of these priorities is underpinned by several objectives that set out what the Council aims to achieve. This includes specific objectives with more detailed actions to be undertaken to meet the Council's approved key priorities, including specific measurable targets, where appropriate.

Manage the Council's Finances Prudently and Effectively

The overall Financial Strategy is linked to the specific priority within the Corporate Plan that is to **manage the Council's finances prudently and effectively**; this has three overarching objectives, which are:

1. Ensure prudent use of the Council's resources.

- Ensure the revenue budget and capital programme remain balanced and sustainable over a rolling 5 year period.
- Manage rigorously the Council's risks.
- Have sound governance arrangements in place approved by the Council's external auditors.

2. Provide value for money through efficient and effective service delivery

- Maintain a programme of improvement reviews for our services to ensure that they are delivered effectively and efficiently. These reviews should challenge existing costs, service delivery mechanisms and consider using outside bodies where appropriate.
- Ensure that where the Council has discretion over charging for services, service users should normally bear the full costs except where there are important community considerations.
- Implement an investment strategy to preserve and improve the financial and other resources available to the Council.

3. Maintain low rate of council tax while protecting services.

- Provide services without the use of reserves.
- Require compensating savings before any new revenue expenditure is approved, including capital expenditure that has revenue consequences.
- Continue to review the Council's costs in order to find further savings.
- Continue to identify and develop income generating opportunities for the Council.

Approach and Approval Process

Linked to the main financial management objective:

1. The Council maintains a 5 year rolling medium term financial strategy model which is underpinned by the key financial principles.
2. The key financial principles, along with an annual position statement is reported to the Corporate Governance and Audit Committee for their consideration in relation to managing the strategic risk of financial resilience, and considering the minimum level of general fund reserves that should be held. The Committee's recommendations are incorporated into the annual Financial Strategy report, considered by both Cabinet and Council ahead of the budget report for the annual budget and council tax setting required prior to the start of the new financial year.
3. A statement of resources is maintained to identify the current level of reserves, the commitments against those reserves, and therefore the potential funds available for the Council to invest in new schemes.
4. In year quarterly revenue monitoring is undertaken to identify trends and cost pressures which will inform the revenue budget for the forthcoming financial year and beyond.

Under the umbrella of the Financial Strategy are other linked policies and strategies which assist with ensuring the robust financial management of the Council, including the Treasury Management and Investment Strategies and a Capital Strategy. The Capital Strategy gives a high level overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of local services and how the risks are managed by the Council.

The Council maintains a 5 year capital programme linking the available resources directly to corporate priorities and taking into account revenue implications within the 5 year Financial Strategy Model. There is also a 5 year planned programme to replace the assets used by the Council to deliver its services developed from the 25 year Asset Replacement Programme Model. This is updated annually as part of the budget cycle.

Medium Term Financial Plan

The aim of the plan is to ensure the financial stability and to support council services by regularly reviewing the key financial influences and identifying the associated risks.

1. Current Financial Position

Whilst the Council set a balanced budget for 2020-21 in March, the Covid-19 pandemic has had a significant impact on the Council due to the loss of income from commercial and discretionary activities that underpin a balanced annual revenue budget. The settlement for 2020-21 was for one year only as the Fair Funding Review and localisation of the Business Rates was delayed until 2021-22. The Government has, however, had to push this back another year due to the pandemic and it is assumed that this will impact on funding from 2022-23 and beyond. The expectation is that local government will not fare well, especially at the shire district level. In 2016 a Deficit Reduction Plan to achieve further savings of £3.8m was approved by Council, and to date £3.5m has been achieved against the targets set, with further anticipated savings or additional income of £0.423m over the next 5 years.

Section 31 grants continue to play a part in giving the Council compensation for any Government policies which impact the business rates retention scheme for example small business rate relief etc.

The approach taken for each of the key financial principles, a position statement and any further actions required, is detailed in Annex A.

The approved 5 year capital and asset renewal programmes totalling £48.611m currently remains fully funded without the need to borrow from external sources and there is a balance of £13.88m uncommitted resources available for new projects and investment in services, having taken into account £8m allocated by Council in July 2020 to address the COVID 19 impact on the Council's budget. This balance includes anticipated capital receipts of £7.877m to be received over the next 5 years.

Appendix 3 of the Strategy report shows the current level of resources and the current commitments. The Council's current approved programmes are available on its website at [Annual budget: Chichester District Council](#).

2. 2021-22 Settlement

The provisional Financial Settlement for 2021-22 is expected to be announced by the Ministry of Housing, Communities and Local Government (MHCLG) in early December 2020.

As with 2020-21 it is expected that the settlement for 2021-22 will be for one year only. Further changes in Government funding due to the Fair Funding Review and the localisation of business rates will now be delayed until 2021, thereby coming into force from 2022-23.

The Government set the threshold which would trigger a Council Tax referendum annually. It is likely that for 2021-22 the threshold will be set at 2% or £5, whichever is greater. This information will be confirmed after the Government's technical consultation on the Local Government Financial Settlement 2021-22 in early December.

There continues to be economic uncertainty both due to COVID and also the on-going EU Transition negotiations. It should be noted that the Council currently relies on approximately £18m of income from its fees and charges to balance its budget, much of this is discretionary spend or linked to the economy. An allowance has been built into the 5 year model for a reduction in income from these sources for 2021-22, then recovering gradually, but not returning fully to the pre-COVID levels, as it is likely that trends such as home working and online shopping will continue after the pandemic has ended.

3. 5 year Financial Model

The 5 year financial model (appendix 2 of the Strategy report) has been updated to reflect the known changes for the forthcoming year, and forecasts for future years based on information currently available. This has been prepared with a prudent view in relation to service cost pressures and areas of financial risk. In addition the efficiency savings from the COVID recovery action plan have been built into the model, with a 25% contingency. This model is kept under review so that the Council has time to respond should the situation, and/or government funding be significantly different to that currently assumed.

The main assumptions in model are:

- a. Uplifts for inflation are given in table 1 below. Inflation this year has been quite volatile. CPI started the calendar year at 1.8%, falling to 0.7% by May. It then climbed to 1.1% in July, before falling again to 0.7% in September.

RPI has fallen from 2.7% in January to 1.0% in May, 1.6% in July, 0.5% in August and 1.1% in September. It has therefore been extremely difficult in formulating this year's strategy to predict inflation levels for 2021-22. The

indices used for the financial model have therefore been the Bank of England target rate of 2% unless otherwise stated.

Table 1: Inflation Assumptions

	2021-22	2022-23	2023-24	2024-25	2025-26
Pay	1%	1%	2%	2%	2%
Pension	-1%	-1%	0%	0%	0%
General prices	2%	2%	2%	2%	2%
Income	2%	2%	2%	2%	2%

These assumptions are used for the strategic modelling, but where appropriate within the detailed annual budget, specific inflation assumptions are applied for utility and ICT support and maintenance agreements. Fees and charges income are also reviewed to identify those which could achieve an increase higher than the base inflation assumption.

The Bank of England Base Rate is currently 0.1% and the picture is far from clear as to what future rates will be. Expectation is that the Base Rate will remain flat for the near future, and could possibly reduce introducing the prospect of negative interest rates.

- b. Service Cost Pressures have been identified and are set out in appendix 2 to the report. The most significant cost pressure relates to the reduction in income from sales, fees and charges. Whilst the Government have compensated Councils for some of their losses in the current year, the support only applies to 2020-21, and so a prudent estimate of the likely longer term impact has been built into the forecasts.

Table 2: Potential Loss of Income from Sales Fees and Charges

	2021-22 £'000	2022-23 £'000	2023-24 £'000	2024-25 £'000	2025-26
Reduction in Income from Sales Fees and Charges	1,650	1,448	1,086	543	543

- c. Saving targets from the COVID recovery plan for stage 1 – Efficiency, and stage 2 – Policy Options, have been identified and reflected in the Financial Model. These are set out in table 3. An allowance of 25% against these targets has been made since some of the savings initiatives are aspirational, and / or are based on income projections which are to some degree outside of the Council's control.

Table 3: Potential Saving Targets

	2021-22 £'000	2022-23 £'000	2023-24 £'000	2024-25 £'000	2025-26 £'000
Efficiency Review	(916)	(1,339)	(1,876)	(1,876)	(1,876)
Policy Options	(97)	(186)	(217)	(217)	(217)
Contingency	253	381	523	523	523
Total	(760)	(1,144)	(1,570)	(1,570)	(1,570)

- d. The Financial Model has an assumed level of Council Tax increases at £5 per annum rather than 2%; although it is unclear at present whether the £5 increase for low taxing authorities such as Chichester will be allowed. The final decision for the Council tax increase for 2021-22 will be for Council to determine once the final settlement is known.
- e. New Homes Bonus (NHB) is currently not used to support the revenue budget as this would be contrary to the Council's key financial principles. NHB for 2020-21 was for one year only rather than legacy payments for four years.

Based on the assumptions contained in the model the Council is able to set a balanced budget by the end of year 5 but will need to use reserves while the COVID recovery plan savings are implemented. However, any additional increases in spending or reduction in planned income will impact on this position, both in the short and medium term. The Council will then need to take further action to maintain a balanced budget over the medium term.

Based on current forecasts the Council will need to use £2.1m of reserves to set a balanced budget for 2021-22.

4. Beyond 2020-21, the Risks and Opportunities

From 2021-22 there are a number of major changes which may affect the assumptions in the 5 year Financial Model, especially in relation to the external environment, that present further potential financial risks and instability to the Council's finances:

- The Government's Spending Review, including the Fair Funding Review, will assess the financial needs for local authorities for 2022-23 and beyond. The Business Rates Retention Scheme (BRRS) will also be part of these changes. The 5 year Financial Model assumes that the Council will receive less government funding in the future as the funding changes are expected to favour higher tier authorities with social care responsibilities. It also anticipated that the New Homes Bonus grant will cease as part of these reforms, and only legacy payments will be received

for the allocations made in the years up to 2019-20. The 2020-21 allocation was a one year allocation only with no legacy payments.

- New BRRS may offer the opportunity to increase funding gained from the business rate growth in the longer term. However, in the short term there is concern about the resetting of the baseline as the growth achieved to date will be lost.
- The impact on the economy and the demand for services as a result of both COVID and the EU Transition. This may affect GDP and the outcome of the Spending Review, and consequently the financial settlement for local authorities from 2022-23 onwards. The Council has a high reliance on its fees and charges to balance the budget, especially those that are more volatile in any economic downturn. The experience in the current financial year shows that some income streams such as car parking charges have been badly affected. An assessment for future years has been built into the five year model. This is uncharted territory and only time will tell if the estimates are accurate.
- Demand on the Council Tax Reduction scheme is expected to increase next year, increasing costs to all precepting bodies.
- Receipts from Business Rates in 2021-22 are expected to reduce due to the pandemic.
- In the medium term there is still a budgetary risk in relation to the statutory override for the accounting treatment for treasury management investments under IFRS 9. This override, which means losses on certain investments are only recognised if the investment is sold, was given for 5 years until April 2023. Lobbying continues for this adjustment to be made permanent. Due to the impact of COVID, the Council is currently carrying £3.2m of potential losses.
- The impact of any funding reductions from other local authorities or funding partners.

5. Conclusion

The Financial Strategy and the 5 year Financial Model have been updated for cost pressures, income reductions, and increased Council Tax support claims, as well as a reduction in Government funding from 2022-23 due to the Fair Funding Review and the resetting of the Baseline for Business Rates.

The Council's reliance on fees and charges to help balance the revenue budget will come under pressure as a result of both COVID and EU transition. The Council needs to take account of changes in people's behaviour in relation to home working and shopping in the high street, both of which are having an impact on trends for car park income.

The 5 year Financial Model anticipates that the Council is able to set a balanced budget for 2021-22 through the use of £2.1m of reserves, before returning to a balanced position by the end of the 5 years. This will however only be possible if the COVID recovery savings are delivered. The Council is legally required to set a balanced annual budget, any shortfall in the short term will need to be considered and addressed in line with the key financial principles and its key corporate plan objective for prudent and effective financial management. The use of reserves to balance the budget is not prudent or sustainable unless there is a carefully managed plan to steer the budget back towards being balanced without the use of reserves. The COVID recovery plan savings are considered to be adequate to deliver a balanced budget over the medium term.

Key Financial Principles

Linked to the Corporate Plan objectives are the Key Financial Principles that underpin the Council's Financial Planning approach as set out in the table below.

Principle	Narrative	Actions
Key Financial Principles		
1. All key decisions of the Council should relate back to the Corporate Plan.	<p>The Corporate Plan is the driver for our decision making, including the allocation of resources, and sets the Council's work plan. Each year the Corporate Plan is reviewed. The affordability role of finance in the corporate planning process has evolved into an assessment of what resources are required to deliver the emerging Corporate Plan projects, whilst maintaining high quality provision of services wherever possible.</p> <p>So far, major service reductions have been largely avoided. However, with finite resources that are predicted to continue to reduce in the immediate future, the Council may not be able to deliver all of its aspirations whilst maintaining existing services to the current level provided. Members may have to make difficult decisions in the future about service provision and competing priorities.</p>	<p>Regular monitoring and reporting against the COVID recovery plan will be undertaken by officers & reported to members.</p> <p>New and emerging issues and service requirements will be considered by Strategic Leadership Team (SLT) and members during strategy planning events.</p>
2. Ensure the revenue budget and capital programme remain balanced and sustainable over a rolling 5 year period.	<p>There is a legal requirement to set a balanced revenue budget and ensure the capital programme is fully resourced. The reduction in Government funding since the banking financial crisis in 2009, has meant that the Council has needed to take action in order to balance the revenue budget without drawing on general reserves.</p> <p>The Statement of Resource Allocation demonstrates that the capital programme remains affordable. In July 2020 Council agreed to set the minimum level of General Fund reserves at £4m, and to release £8m to address the financial pressure caused by COVID. Whilst the intention is to set a balanced budget over the medium term, this finite resource remains available to support revenue while the COVID recovery plan is implemented.</p>	<p>The 5 year financial model will continue to be monitored and updated, and Cabinet is given regular briefings on this throughout the year. Senior managers will monitor delivery of the COVID Recovery Plan.</p> <p>Budget monitoring for revenue and capital schemes is completed quarterly by budget managers, and reported to all members on the Modern.gov website.</p>

Principle	Narrative	Actions
	<p>The 5 year financial risk model will be updated and reported to Cabinet in November with the forecast of the budget for the next five years.</p>	<p>To consider future Government funding in light of the fair funding review which will now impact settlements from 2022-23 and beyond, along with the resetting of the Baseline for Business Rates.</p> <p>Any funding gap based on current projections will need to be considered by SLT and members to ensure that an action plan is agreed.</p>
<p>3. Over the next five years return the Council to a position of non-dependency on reserves.</p>	<p>It is essential that the Council strives to return to a position of balancing its budget without the need to rely on reserves. However, in order to protect public services, Council has agreed to a phased approach to delivering the COVID Recovery Plan while using reserves to assist in the intervening years. Such an approach is only sustainable while projections indicate that a balanced position will be achieved over the medium term, and that there are sufficient uncommitted reserves to support such an approach. The 5 year model indicates that just over £8m of reserves will be required, and this has been reflected in the Resources Statement.</p> <p>Appropriate funding needs to be built into the revenue and capital budgets, taking into account the whole life cost of the assets. With reserves being largely committed, the revenue budget will need to make an appropriate contribution to reserves to fund any future capital commitments.</p> <p>Base budgets incorporate repairs and maintenance to council buildings, thereby removing dependency on reserves for what is a recurring revenue cost. Similarly, other recurring items still funded from reserves must be built into future revenue budgets.</p> <p>The capital accountant co-ordinates a full review of the existing asset base of the council with divisional and service managers to identify and assess</p>	<p>To keep under review the COVID Recovery plan, and the availability of reserves. These need to be considered regularly in the context of the 5 year model with the aim to achieve a balanced budget without use of reserves by 2025-26.</p> <p>To build future demands for recurring expenditure into the 5 year Financial Model, and thereby into any potential savings target.</p> <p>To avoid funding recurring expenditure from reserves as a key financial principle.</p>

Principle	Narrative	Actions
	<p>the need to reinvest in our existing essential assets. This is updated annually to ensure the current asset base remains affordable over the long term.</p>	
<p>4. In order to maintain a balanced budget in a climate of reduced funding, savings in the revenue budget or external funding will need to be identified before any new revenue expenditure, including capital expenditure that has revenue consequences, or any reduction in planned income is approved.</p>	<p>The Council needs to have certainty about capital and revenue funding before entering into new commitments. This will require robust project management processes to ensure the full consequences of embarking on particular projects are known and understood from the outset for both revenue and capital. The whole life costs of the project must be considered.</p> <p>Where projects are dependent on match funding, the funding partner may impose certain conditions. The Council needs to clearly understand what those conditions are and their possible financial consequences. Projects should only proceed once all funding has been secured, and the conditions have been assessed and evaluated. The relevant service should also consider, in advance, any costs that may arise at the end of the project and prepare an exit strategy so that the full consequences are known in advance. Whole life costing should be used. Copies of all funding agreements should be copied to the Financial Services Division to ensure all possible future liabilities are considered and documentation retained.</p> <p>Where new spending priorities or income reduction are to be introduced into the revenue budget, corresponding savings or additional income / funding will need to be identified.</p>	<p>All Project Initiation Documents (PIDs) are to be based on whole life costs, and include an exit strategy.</p> <p>New investment proposals should be linked to the Corporate Plan, and assessed to ensure they represent for value for money.</p>
<p>5. Review costs in response to changes in service demands.</p>	<p>The call upon council services is fluctuating more during a period of economic and financial uncertainty. Whilst short-term variances in demand can be accommodated, any longer term trends, i.e. beyond one year, will require the Council to respond by redirecting its resources in line with changes in demand. This is a key principle as future changes in demand on services are bound to occur.</p> <p>Prioritising the Council's services will enable scarce resources to be directed</p>	<p>Essential services that experience an increase in demand will be recognised and supported. However, where there is an on-going reduction in demand beyond one year resources should be reviewed in order to realign resource allocation.</p>

Principle	Narrative	Actions
	to areas of need and priority over the medium term.	
<p>6. Where the Council has discretion over charging for services, consideration needs to be given as to the extent to which service users should bear the costs, and the proportion, if any, that should be met by Council Tax.</p>	<p>The Council has limited discretion to set fees and charges for some services. Clearly, the setting of charges should have regard to community needs for those services as well as affordability. Traditionally, many fees and charges have increased in line with inflation. The Council has a Fees & Charges Policy. This requires services that have discretion to charge do so in an attempt to at least break even, unless there is a clear approved policy reason for not doing so. The underlying principle is that the service user should pay the full cost of the services received.</p>	<p>Service managers need to consider their fees & charges in advance of the start of each financial year. Any individual services operating at a deficit should aim to break even unless there is an approved policy to support their on-going subsidy. This should be based on the whole cost of delivering the service, including use of assets.</p>
<p>7. Continue to review the Council's costs in order to find further savings.</p>	<p>The Council has already achieved significant savings over recent years. However, the Council will continue to seek further efficiencies to help free up resources, ensure services are as efficient and effective as possible and support the community. The focus is to ensure services are delivered to an appropriate standard at a competitive unit cost.</p> <p>Council agreed the COVID Recovery Plan in July 2020. This tasked officers to identify efficiency savings as the first stage in a three stage programme to address the budget position.</p> <p>Aside from formal service reviews, service managers should normally be considering the best and most cost effective procurement methods in their service areas.</p>	<p>The challenge now is to implement the savings that have been identified. This will be achieved through the governance arrangements that Council also approved in July 2020, with the Organisational Recovery Group having immediate oversight, reporting into the Leader and Chief Executive and monitored by Overview and Scrutiny and Cabinet.</p>
<p>8. Match Council Tax increases to a realistic and affordable base budget.</p>	<p>The objective is to limit increases in Council Tax to modest and affordable levels over the next 5 years, whilst accepting that such an objective may be impacted by national government policy.</p> <p>In 2018-19 and 2019-20 the Government changed the threshold for triggering a requirement to hold a referendum for council tax increased to over 3%, previous years this was 2%. District councils were permitted to</p>	<p>Assumptions are made in the 5 year financial strategy model for council tax increases. The model will be updated as necessary once the Government's criteria is known.</p>

Principle	Narrative	Actions
	<p>raise their council tax by the highest of the 3% or £5, which aids those with a low tax base. In effect this rule change has permitted this council, since it has one of the lowest Council Tax levels, to increase its Council Tax by £5.</p> <p>The threshold for 2020-21 reverted back to 2% or £5. The Government will confirm what rules will apply for 2021-22 in early December.</p>	
<p>9. Budgets should be pooled with other service providers to achieve more effective and cost efficient outcomes for the community.</p>	<p>It is likely that in future the Council will become more involved in new ways of working, including greater partnership working, devolved budgets and pooling resources with other agencies. It is important that strategic objectives and community outcomes are agreed from the outset when partnerships are formed so that the achievement of results can be measured and reported to members to ensure public funds are being used in the most efficient way to achieve greatest impact for the community.</p>	<p>Where appropriate we should commission services with other service providers and pool our budgets to provide more effective and efficient outcomes for the customer.</p>
<p>10. New Homes Bonus (NHB) This should be allocated annually, and only committed once received.</p>	<p>The NHB is not ring-fenced, and as such the Council can choose how it wants to use this source of funding, although the previous coalition Government pointed out that it expected it to be used to help “reward” communities that have taken housing growth. Furthermore, the Government also stated that it expects councils to consult with their communities on its use, and in areas where there is a national park as the planning authority, to also consult with the park authority.</p> <p>The funding is paid as a grant in respect of each new domestic dwelling coming into the tax base (net of any long term empty properties) of the whole District, including the area within the National Park. The amount paid is based on the national average council tax, and used to be paid for the following four years. This changed for 2020-21 when the grant was reduced to a one year grant only. This grant is paid for development that exceeds a baseline set at 0.4% of the Council Tax Base, and is split 20% to the County Council and 80% to the Housing authority, i.e. CDC.</p> <p>The view remains that NHB may be adjusted further or even abolished</p>	<p>The NHB is to be reserved for community and other uses after it has been received. It remains important, however, to allocate this funding taking into account the legal requirement to set a balanced budget for the council. As such this will be reviewed annually.</p> <p>The grants and concessions panel review the use of NHB, along with other grant funding that the Council makes available to individuals and groups.</p>

Principle	Narrative	Actions
	<p>altogether. It should not, therefore, be relied upon long term to resolve our budget position, and should only be committed after it is received.</p> <p>In previous years the Council have not used the NHB to assist in balancing our revenue budget, and have instead used this source of funding to help reward communities by funding one off projects. .</p>	
<p>11. Localisation of Business Rates. We should review the decision to pool our business rates annually after receipt of the government draft settlement to ensure that the Council is in the best possible financial position.</p>	<p>The Council participated in a (50%) business rates (BR) pool for some authorities in West Sussex in 2018-19, thereby enabling us to retain more of the BR growth locally for investment jointly with other pool member authorities which included the county council, Arun, Adur and Worthing.</p> <p>In 2019-20 all West Sussex authorities participated in a 75% BR Pool Pilot having been selected to do so for 1 year by the Government, but this arrangement ceased on 31 March 2020.</p> <p>In 2020-21 a business rate pool was created similar to the 2018-19 pool, but did not include Chichester District Council (CDC). That was in order to maximise the gain to the County as a whole, while all West Sussex authorities, including CDC, are able to bid for project funding from the pool gains.</p> <p>For 2021-22 the same authorities that made up the 2020-21 pool are considering whether to pool at all given the uncertainty that COVID has brought to the level of business rates. (Authorities that do not form a pool are protected by individual government “safety nets” while those in a pool are not).</p>	<p>The business case for pooling shall be reviewed annually taking into account the potential risk associated with being in a pool.</p>
<p>Resources and Capital Programme Principles</p>		
<p>1. Capital receipts, reserves and interest on investments (other than property and multi bond investments) will primarily be available for new</p>	<p>This is a long-established principle whereby non-recurring resources are used to meet non-recurring expenditure. The revenue budget is no longer reliant on reserves. Interest receipts are, with the exception of property related income and mixed asset bonds, diverted to support the capital programme.</p>	<p>Temporary sources of funding should not be relied upon to fund recurring revenue costs. Budget managers embarking on new projects that involve temporary</p>

Principle	Narrative	Actions
<p>investment of a non-recurring nature, thereby minimising the overall financial risk. Income earned from property investments, both directly owned and managed property, and the Local Authority Property Fund, together with mixed asset bonds, can be used to support revenue as the income streams earned are much less volatile.</p>		<p>funding must design an exit strategy from the outset to ensure the council is not left with unfunded costs at the end of the funding stream.</p>
<p>2. Ensure that a sufficient level of reserves are maintained, as informed by the Financial Strategy, so that the Council can remain flexible and is able to respond to a changing local government environment.</p>	<p>The objective is to offer resilience against the unexpected and provide resources for new initiatives including one-off costs to assist with reshaping the organisation.</p> <p>The Capital Programme is an estimate of the capital schemes' likely cost and the funding resources likely to be available to meet that need. This is always subject to amendment if, for example, a scheme cost is higher than anticipated or an anticipated capital receipt is less than expected. The capital programme is by its nature constantly changing and the resource position will be continuously monitored to ensure it remains affordable. The Resources Statement reflects the current level of reserves, anticipated receipts, and commitments, and this is updated alongside the 5 year financial plan.</p>	<p>Routine monitoring of the capital schemes and the overall resources position will continue to ensure the capital programme remains affordable.</p> <p>All earmarked reserves will be reviewed annually with service managers to ensure that they remain relevant and essential, otherwise the funds should be returned to available balances.</p>

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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Council Resource Position as at 11 November 2020 (Projected)

Period 2020/21 to 2024/25

	£m
Reserves at April 2020	49.967
New Resources	
Asset Sales (96%) (*)	7.877
Interest on investments (excluding property & all external funds)	0.499
NHBS 2020/21	1.585
Revenue contribution to Asset Replacement Fund	7.019
Revenue contribution to Reserves 2020/21	0.522
External income due to support capital programme (incl CIL)	22.398
Interest on repayment of SLM advance	0.910
Total Resources	90.777
Less commitments:	
Insurance Fund	-0.266
Provision for one off redundancies	-0.110
Minimum level of reserves	-4.000
Other earmarked funding	
Reserve commitments - Revenue	-10.910
COVID-19 Recovery report - Support to revenue account	-8.000
Less contingent liability	
LEP Grant	-5.000
Available Resource	62.491
Current Capital Projects	-38.149
Current Asset Replacements	-10.462
Uncommitted Resource	13.880

* Asset Sales are shown Net of 4% cost of sales

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Fees and Charging Policy

The Council approved a new Fees and Charging Policy in November 2010 as part of its financial plans at that time. The policy has not been reviewed or updated since.

An updated and revised policy is set out below:

Introduction

1. The Council provides a wide range of services to the residents and businesses in its district. Some of these services are statutory and must be provided by the Council, but others are discretionary.
2. Councils are able to provide additional non-statutory services and charge for these services under the Local Government Act 2003. This includes any enhancements to statutory services.
3. Fees and charges are a very important source of income to the Council, enabling important services to be sustained and provided. The Council generates approximately £18m of income each year from fees and charges for its services. Some of these fees are mandatory and the Council has no discretion over the level of fees charged, however, many others are discretionary.
4. The level of fees and charges can influence the way in which services are used, such as promoting access to certain services or to help prevent wasteful use of a service.
5. This policy confirms the Council's basic principle of "the service user pays" and that charges for discretionary services are expected to be set in order to fully recover their costs as a minimum, unless there is an existing policy or members' decision not to do so. It is important to highlight that where a discretionary service does not recover the full cost, then the service user is being subsidised by the tax payer.
6. The policy gives a framework under which fees and charges are set, thereby ensuring that all services adhere to the same procedures and a consistent approach when setting charges across all council services.

Policy Purpose

7. The purpose of this policy is to:
 - Clarify the mechanism for setting each fee and charge;
 - Provide greater transparency and public accountability by outlining the rationale behind fee and charge setting;
 - Ensure that fees and charges maximise community benefit from Council goods and services;
 - Ensure that fees and charges contribute to community outcomes and Council objectives and priorities;
 - Achieve legal compliance;

- Encourage sustainable use of and fair access to council services, through carefully considered fees and charges;
- Minimise the burden on the Council Tax or Business Rate payers where goods and services principally benefit distinct groups or individuals, by defining those circumstances where a fee or charge is appropriate;
- Provide a fee/charge setting process that is flexible, adaptable and able to meet changing circumstances; and,
- Ensure that fees and charges recover actual and reasonable costs as a minimum, unless there are valid policy reasons not to do so.

Policy Statements

8. Fees and charges will be put in place to provide the best overall value for residents, businesses and the community. This will mean that some services will be charged at a commercial rate, whereas others will be subsidised to encourage their use. Where statutory charges are in place, these will be included at the statutory rate.
9. Where possible income will be maximised to contribute towards service delivery. This does not, however, mean that the cost of all services will be fully charged as this may not be appropriate in all service areas.
10. It is the responsibility of the Service Manager to set the fees and charges for their services, ensuring that they are fixed at the correct level and approved appropriately via the annual budget process. Where relevant benchmarking against other councils or providers will be undertaken to aid fee setting.
11. New fees and charges put forward that significantly deviate from this policy will need approval by Cabinet or by the relevant Committee under delegated authority.

Charge Setting

12. In setting charges, any relevant government guidance will be followed. Stakeholder engagement and comparative data will be used where appropriate to ensure that charges do not adversely affect the take up of services or restrict access to services.
13. Full consideration will be given to the costs of administration and the opportunities for improving efficiency and reducing bureaucracy. The preference is for services to gain upfront payment for services or at the point of service delivery where appropriate, and not to rely on invoicing.

Charging Policy

14. Fees and charges will be set using the following charge types:

Charge Type	Detail
Statutory	Fees are set by Government and are to be charged at the statutory rate.

Charge Type	Detail
Commercial	Fees set in line with other providers, influenced by market forces including competitors, and may include benchmarking against other local authorities.
Full Cost Recovery	Fees set based on recovering the full cost of providing the service.
Subsidised	Fees set at below the cost of providing the service, meaning part of the service is funded by other council income such as Council Tax and Business Rates. *
Nominal	Fees set at a nominal fee, meaning most of the service is funded by other council income such as Council Tax and Business Rates. *
Free	Fees not charged. All of the service is funded by other council income such as Council Tax and Business Rates. *

* Each of these requires a policy or formal member resolution to subsidise the service.

Discount and Concessions

15. Sometimes discounts or concessions are made available for some services. This could be to ensure that everybody has access to a service, or to provide some services at a reduced cost to certain groups to encourage the use of the service, or as part of a promotional event. In these cases there must still be appropriate governance arrangements, but this should be delegated to the portfolio holder and the relevant Director in consultation with the Director for Corporate Services. This will enable decisions to be taken swiftly and in the best interests of the council.

16. In Summary

16.1 Unless otherwise stated, all discretionary fees and charges will be reviewed annually by service managers, with the default assumption that all fees and charges be increased by the rate of inflation as determined by the Director for Corporate Services and agreed in the Financial Strategy.

16.2 Service Managers are expected to review all fees and charges and have discretion to deviate from this base position of inflationary uplifts authorised by the relevant Director in consultation with the Director for Corporate Services. The review should take into consideration the cost of providing the service, inflationary uplifts, as well as service information and knowledge on market conditions or the impact of fee charges on service users. This will also include a review of any discounts and concessions.

16.3 Service managers and portfolio holders need to consider current charges, and the possibility of new charges, and whether those charges should fully offset the cost of the service or not, or be based on market rates evidenced by benchmarking.

- 16.4 Consider whether the charges are consistent with other council policies and strategic aims, including access to services for those who may have difficulty paying.
- 16.5 Where a service proposes the introduction of a new charge, or to subsidise a service by charging less than the cost, then either as part of the service planning process or separately, these should be approved by Cabinet in advance of the forthcoming financial year.
- 16.6 Service users and other stakeholders should be consulted where changes are significant, and impact assessments undertaken, if appropriate.
- 16.7 Directors to be able to alter charges during the year in consultation with the portfolio holder and the Director for Corporate Services (Section 151 Officer).
- 16.8 New fees will generally be implemented from 1 April each year.

Chichester District Council Contaminated Land Strategy

February 2021

Consultation

This document is the revised Chichester District Council Contaminated Land Strategy¹ which reflects comments received during a public consultation² exercise (approved by CDC Cabinet 8th December 2020) carried out between 1st January 2021 to 29th January 2021. The amendments made following the consultation were considered 'minor' and so in consultation with Penny Plant, Cabinet Member for Environment and Contract Services, the Strategy was approved for adoption by Andrew Frost, Director of Planning and Environment, February 2021.

¹ Previous to the 2015 Strategy the document was titled the 'Inspection strategy for contaminated land'.

² A full list of consultees is at page 22 of this document.

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2	Part 2A Inspections carried out by CDC (since 2001.)
3	Consultees
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Councillor foreword

Whilst as a policy area 'contaminated land' may be somewhat unseen it is nonetheless an important public health issue which warrants serious attention. The approach to tackling it is risk based using sound science for the protection of public health, seeking not to cause disproportionate call on either the public purse or third parties, such as developers and land owners.

The work Chichester District Council (CDC) has carried out under previous strategies stands it in excellent stead to continue to effectively deliver this policy area and related service. We have an extensive database of land that has had a previous use that may have left a legacy of contamination which informs our management of the issue through the Development Management system and informs our response to requests for information from the public. That said our starting point is to consider that land is not contaminated land unless we have substantive evidence to the contrary.

This strategy update is a light refresh as there have been no significant changes to the regime since our 2015 document was written.

P C Plant



Penny Plant
CDC Cabinet Member for Environment and Contract Services

1. CDC's Objectives for dealing with land contamination:

CDC seeks to implement the Part 2A regime and make judgements pursuant of its duties therein within the context and framework of the statutory guidance (DEFRA Contaminated Land Statutory Guidance (April 2012)). Furthermore in dealing with land contamination CDC's aims are:

- to identify and remove unacceptable risks to human health and the environment,
- to seek land remediation through the development management system,
- not to carry out the detailed inspection of sites unless there is significant possibility of significant harm occurring or the likelihood thereof,
- seek to ensure that contaminated land is made suitable for its current use and
- to ensure that the burdens faced by individuals, companies and the community as a whole are proportionate, manageable and compatible with the principles of sustainable development.

The following objectives are pursuant of the aims above. CDC;

- considers that land is not contaminated land unless there is reason to consider otherwise,
- considers the Development Management system as the predominant way in which land affected by contamination will be remediated,
- will encourage voluntary remediation of sites where appropriate,
- will only use Part 2A where no appropriate alternative solution exists,
- will not undertake a strategic or detailed inspection of any site where a planning permission exists or is understood to be imminent unless there is significant evidence that the land is contaminated land,
- will continue the process of strategic inspection across Chichester District,
- will continue to risk prioritise sites for detailed inspection³,
- will consult landowners before carrying out detailed inspection of their land,
- will refer any issues or allegations relating to radioactivity on land to DECC,
- will only use its powers of entry under Section 108 when it is satisfied that there is a reasonable possibility that a significant pollutant linkage exists,
- where remediation is carried out by CDC then, where liable parties are identified, CDC will pursue the appropriate persons for the apportioned share⁴ of the liability,
- will seek to communicate in language that is appropriate for the persons with whom we are communicating and where appropriate in non-technical language,
- seeks to communicate in language sensitive to the fact that land contamination issues have potential to cause property blight and psychological stress,
- will make available its contaminated land Public Register on its webpage,
- will, where relevant, consult other statutory and non-statutory bodies so as to seek advice and share knowledge,

³ CDC has risk assessed its database of legacy sites and as such the process of prioritisation will mainly be about refinement of priorities arising from new knowledge for sites already on the database or prioritising a new site of which we were previously unaware.

⁴ Which could be 100% of the cost.

- will request in writing that, on behalf of CDC, the EA carries out the detailed inspection of any Special Site of which CDC becomes aware,
- will, where necessary, authorise an officer of the EA to exercise the powers of entry conferred on it by section 108 (Environment Act 1995),
- will continue to train the Contaminated Land Team (CLT) so as to ensure an effective service with regard to its duties under the regime and
- has a policy of openness with regard to disclosing information held about land contamination issues.

Our objectives under this Strategy are congruent with CDC's Corporate Plan 2018 – 2021 and its priority to 'manage our built and natural environments, to promote and maintain a positive sense of place' and the objective to; maintain clean, pleasant and safe public places. Likewise our objectives are congruent with the policies expressed in the National Planning Policy Framework.

2. Introduction

CDC adopted its first Contaminated Land Strategy⁵ in 2001⁶ and amended it to reflect changes to the regime in 2010 and 2015. Since 2015 the regime has undergone no significant changes and this document refreshes the Strategy to bring it in line with the recent revisions and CDC's current procedures.

Development on brownfield land means that many development sites may have a legacy of pollution from a previous use. Ensuring that land is made suitable for use through the Development Management system is vital to protecting public health, water resources and value of property. This involves a process of informing the Development Management process and subsequently agreeing the developer's work to ensure that sites are made suitable for their proposed use for their design life.

Despite the government removing the grant which facilitated detailed inspection of sites, the duty on councils to inspect their districts remains. For CDC, beyond dealing with sites through the Development Management process and continuing to develop the strategic inspection database of sites, the legislation is a 'safety net' enabling effective intervention should any sites require urgent detailed inspection.

Much has been achieved since we adopted our first strategy all of which places CDC in a strong position to continue to ensure a robust approach to this important public health issue.

We have endeavoured to make this document as strategic as possible, to provide context for our work and to provide clarity where the Statutory Guidance allows for some local discretion. As such it must be read in conjunction with the Statutory Guidance⁷ and, where relevant, other pieces of legislation and guidance.

We have endeavoured to make the terminology used in this strategy consistent with the statutory guidance and the glossary of terms will provide readers with greater understanding in that regard. In any case for the avoidance of doubt about definitions

⁵ Known then as the 'inspection strategy for contaminated land'.

⁶ 4th December 2001.

⁷ Environmental Protection Act 1990 Part 2A, Contaminated Land Statutory Guidance, DEFRA, April 2012.

or meanings then the statutory guidance⁸ must be considered to over-ride the content of this strategy.

3. The contaminated land regime

3.1. Legislative context

The Environmental Protection Act 1990 Part 2A introduced new duties to Local Authorities. It required that they publish an inspection strategy for their District (this document), keep a register of 'Contaminated Land' and inspect their area in a rational and ordered fashion for the purpose of identifying 'Contaminated Land'. The term 'Contaminated Land' is defined in statute as is the process for formally determining land as Contaminated Land.

Contaminated Land definition:

Is any land which appears to the local authority in whose area it is situated to be in such a condition, by reason of substances in on or under the land that (a) significant harm is being caused or there is significant possibility of such harm being caused; or (b) significant pollution of controlled waters is being caused, or there is significant possibility of such pollution being caused.

The supporting guidance⁹ for Part 2A details the inspection process including determining liability amongst specific groups or 'appropriate persons' previously associated with the land. Appropriate persons include previous land owners or occupiers and any person carrying out activities on the land, including current occupiers.

In reality the production of a contaminated land strategy has meant that authorities collated data on previous land-uses that may have given rise to contamination in, on or under the land. These are stored as a digital map based database and have all been risk prioritised.

The statutory guidance was updated in April 2012 and suggests that local authority strategies should be updated to reflect the changes to the guidance. There have been no significant updates to the guidance since that date.

3.2. Significant pollutant linkage

For land to be determined as contaminated land there must be a significant 'pollutant linkage' present. A pollutant linkage is where a source of pollution is connected to a receptor by a pathway so as to give rise to harm. There may be multiple pollutant linkages on a site¹⁰.

3.3. Liability

Part 2A identifies two types of 'appropriate persons' in relation to liability for remediation of the land (that the enforcing authority needs to consider). These are

⁸ Which is legally binding on authorities.

⁹ Environmental Protection Act 1990: Part 2A, Contaminated Land Statutory Guidance, April 2012.

¹⁰ These might be at different parts of the site, be by separate pathways (potentially by air, land and/or water) and affecting different receptors.

only relevant once one or more significant pollutant linkages have been confirmed and are:

- Class A liability group¹¹: that is persons who knowingly permitted a significant pollutant linkage to be in, on or under the land.
- Class B liability group¹²: owners or occupiers of the land.

Only where no Class A persons can be found will any Class B appropriate persons bear any liability for contamination. Once Class A appropriate persons are identified then liability for each significant pollutant linkage is identified. If the Class A person no longer exists in relation to a significant pollutant linkage then the liability will fall to Class B person (current owner or occupier).

There are six sequential tests to apply to each member of the Class A liability group:

- Test 1 Excluded activities.
- Test 2 Payments made for remediation.
- Test 3 Sold with information.
- Test 4 Changes to substances.
- Test 5 Escaped substances.
- Test 6 Introduction of pathways or receptors.

Once exclusions have been made, CDC will 'follow the general principal that liability should be apportioned to reflect the relative responsibility of each of those members for creating or continuing the risk now being caused by the significant linkage in question.' 'If appropriate information is not available to enable the enforcing authority to make such an assessment of relative responsibility then liability is apportioned equally amongst the liability group.'

Where no appropriate persons can be found, or after the six sequential tests there are no remaining liable persons, then the linkage is known as an 'orphan linkage' and the local authority should bear the cost of any remediation that is carried out.

Where CDC carries out remediation and an appropriate person can be found then, within the guidance offered at Section 8 of the Statutory Guidance, CDC will seek to recover the costs of the remediation from the appropriate person.

3.4. DEFRA Grant

Until 2012 Central Government offered financial support to local authorities in regard of their duties under Part 2A. However the grant was effectively stopped other than for 'absolute emergency cases' by Lord De Mauley's letter (DEFRA December 2013) and ceased to exist in any form after 2017. Local authorities' statutory duties remain but central government financial support has been removed. CDC has registered this as an operational risk and has made some provision to meet that risk should it arise.

3.5. Strategic inspection and detailed inspection

¹¹ Or person.

Part 2A requires that local authorities cause their areas to be inspected with a view to identifying contaminated land and to do this in accordance with the statutory guidance. Two types of inspection are intended, they are:

- Strategic inspection; collecting information about previous land-uses and prioritising them for further detailed inspection and
- Detailed inspection; taking soil samples and carrying out risk assessments in order to make determinations about the site¹² in relation to contaminated land.

As an in-house task the detailed inspection of sites through intrusive investigation, analysis of samples (soil, water and gas), risk assessment and remediation is beyond the technical capability of Chichester District Council¹³. Such work has previously been contracted out to consultants, is expensive and might commonly cost multiples of £10K with upper bound cost estimates for site remediation of several £100K not being uncommon.

Although DEFRA removed the supporting grant for new cases the statutory duty for local authorities to inspect land for land contamination remains. Furthermore DEFRA suggests that the authority seeks to minimise unnecessary burdens on the taxpayer.

Given the above situation CDC is not currently pursuing strategic site inspections beyond the desk top (Phase 1A Stage¹⁴). That is to say that CDC will not undertake intrusive sampling (soil, water or gas), risk assessments or remediation exercises unless they are funded by a third party or until such time as CDC has allocated the appropriate funds to allow the Council to proceed. CDC is also not publishing any timescales for detailed site inspection at this time. The exception to this is if an urgent site inspection was to arise which follows as below.

3.6. Urgent site inspection

The need for urgent detailed inspection might arise in a situation where CDC becomes aware that a previously developed site is likely to be causing significant harm. Such circumstances are extremely rare, nevertheless CDC has a duty under the legislation to inspect any such site. This duty needs to be balanced against other calls on CDC's resources. As such under those circumstances CDC would:

- seek to establish who the liable persons for the site are and whether they still exist,
- apply the six sequential tests from the guidance to establish which liable parties might drop-out of the liability group,
- apportion the liability between the remaining liability groups,
- establish whether any linkage is an orphan linkage,
- seek voluntary inspection by the site owner and/or occupier,
- enter into discussions with DEFRA about the availability of any available grants or funds,
- seek to finance any essential related work through monies held in reserves expressly for this purpose or, where these monies are insufficient, from reserves mandated by Cabinet and

¹² or any part of a site.

¹³ Or any council of which we are aware.

¹⁴ Comprising a desk study, site walkover, conceptual model and initial risk assessment.

- seek to recover any costs from liable persons.

4. The Water resources Act 1991

Section 161-161D of the Water Resources Act 1991 and the Anti-Pollution Works Regulations 1999 as amended 2009 empower the Environment Agency (EA) to serve a “works notice” on any responsible person who has “caused or knowingly permitted “a pollutant to enter controlled waters, including from contaminated land, requiring them to take action to prevent pollution or hydromorphological harm in controlled waters or to clean up/restore the effects of a pollution incident or hydromorphological harm.

The Environment Agency can take action themselves under section 161 and 161ZA of the Water Resources Act 1991 to prevent pollution or hydromorphological harm and to clean up or rectify an incident where it is an emergency situation or the likely or responsible person cannot be identified.

Guidance from the EA (Policy and Guidance on the use of Anti-Pollution Works Notices) suggests that in most cases of actual or potential pollution of controlled waters as a result of contamination, the problem will usually be dealt with under the contaminated land Part 2A provisions of the EPA 1990.

5. Radioactive contamination of land

The revised Statutory Guidance does not apply to radioactive contamination of land. The responsibility lies with the Department of Energy and Climate Change. CDC will refer any such issues to DECC.

6. Progress to date

CDC’s work under the previous strategy positions the council very favourably in order that it can continue to administer land contamination issues effectively for the foreseeable future. A significant spatial dataset was captured by officers and is held in a digital mapping database (ArcGIS¹⁵) and on CDC’s database platform ‘Uniform’. The sites captured were identified from a variety of sources including; historic maps, officer knowledge, EA landfill licensing records, petroleum licensing records, pollution incident reports and other verified anecdotal information.

A good proportion of the legacy sites’ datasets have been added to by virtue of site walkovers, consultant’s reports and other local knowledge (strategic inspection). This process of refining our knowledge¹⁶ about individual sites continues but at a much slower rate than when the database was first being collated.

The dataset described above forms the basis of a planning constraint layer. This is used to trigger a planning consultation request for environmental health and the Environment Agency to comment on planning applications which overlay or abut potentially contaminated sites. For some sites, such as petrol stations and landfill

¹⁵ Proprietary digital mapping software produced by ESRI.

¹⁶ And adding them to the database and planning constraint layers.

sites, we have added 'buffers'¹⁷ as the impact of any pollution might extend beyond the site boundary. Over the 2016 – 2019 period of the previous 2015-2020 strategy an average 233 planning applications have been considered by the CLT per year. Where planning conditions relating to contaminated land are appended to planning permissions then environmental health audit the work that is undertaken by consultants to make the site suitable for its proposed use and finally agree the sign-off of the related planning condition. This process involves agreeing the site investigation strategy, reviewing the reports and risk assessment and remediation strategy. It might also involve a site visit and/or meeting with the developer and their consultant.

The legislation also intends that authorities inspect previously developed land where the development was on land with a previously potentially contaminative use. This approach was facilitated by authorities ranking their database sites for inspection such that the perceived highest risk sites would be inspected first and such that some sites may never come forward for pro-active inspection under the regime. CDC completed this work using proprietary software and all sites are risk ranked from 'A' (high risk) to 'E' (low risk).

A number of screened high risk sites have been visited to carry out a preliminary site walkover inspection and more proactive inspection has subsequently been carried out for three sites for which CDC considered there was potential for high risk (see Appendix 2 for details of these detailed inspections).

The database is also a vital resource for answering requests for information made under the Environmental Information Regulation 2004. Such requests are commonly made by persons and businesses either transacting a property or making property portfolio valuations. The database enables CDC to answer these questions so as to help avail persons of useful data with which to make evaluations of risk. Since 2001 CDC has answered 750 of these requests for information.

7. Development Management

Most land affected by contamination is dealt with through the Development Management system.

Contamination in, on or under land can present risks to human health and the wider environment. This can adversely affect or restrict the beneficial use of land and often development presents the best opportunity to successfully deal with these risks. The planning system therefore has a key role to play in facilitating the development of land affected by contamination.

The broad approach, concepts and principles behind land contamination management adopted by the Part 2A regime should be applied to the determination of planning applications. Planners, developers, statutory bodies and the CLT should work together at every stage in the Development Management process to ensure that land contamination issues are properly addressed.

¹⁷ Buffers are effectively indicative zones around the site boundary indicating where the influence of pollution might extend to.

After remediating through the Development Management process, as a minimum standard, land should not be capable of being determined as contaminated land under Part 2A of the EPA 90¹⁸.

In dealing with land contamination via the Development Management system CDC will:

- Use the ArcGIS based planning constraint layers to trigger a consultation request to the Contaminated Land Team (CLT) from the Planning Officer,
- review and update the ArcGIS planning constraint layers as necessary and, as a minimum, annually,
- expect developers and their agents to voluntarily deal with land contamination issues in pre-planning application discussions and before determination of any relevant planning application,
- respond to planning consultations within CDC's internal agreed response times,
- where land contamination issues might prejudice the economic viability of any given permission reserve the right to object to a planning application,
- object to a planning application where it is likely that the implementation of any given permission would be technically unfeasible,
- reserve the right to object to a planning application where insufficient evidence is submitted with the application to determine whether the site can be remediated as a result of the permission,
- recommend, where the CLT considers appropriate, that any consent be conditional of relevant standard planning conditions,
- make a record of planning comments in Uniform,
- where appropriate, the CLT will liaise with the Development Management officer at the EA,
- audit all reports relating to land contamination and provide written commentary to the relevant parties including; the developer, the contaminated land consultant and the Development Management case officer,
- require ongoing reports beyond the time of the delivery of the site where monitoring and/or remediation is ongoing,
- require that reports submitted for consideration by the CLT will be prepared by competent persons¹⁹,
- agree the sign-off/discharge of relevant planning conditions when the work is completed and documented to a satisfactory standard,
- work within the CL Statutory Guidance, related documents and the NPPF,
- seek to achieve the highest standard for the protection of public health whilst not incurring excessive cost for the developer or public funds and
- keep the planning related contaminated land CDC web-pages up to date.

In considering risks from land contamination in relation to any future use or development, CDC assumes that the development will be carried out in accordance with any existing planning permissions. In particular CDC assumes that:

¹⁸ NPPF, paragraph 178, b).

¹⁹ NPPF para 178, c).

- a) That any remediation which is the subject of a condition attached to that planning permission, or is the subject of any planning obligation, will be carried out in accordance with that permission or obligation.

7.1. The Developer's Role

Where a development site is affected by contamination responsibility for securing a safe development rests with the developer and/or landowner²⁰.

The right information is crucial to good decision making and CDC recommends that developers discuss what is required with CDC planners, the CLT and statutory consultees at the pre-planning application stage^{21, 22}. Failure to provide the right information can lead to delays and/or refusal of planning permission.

In order to satisfy the planning authority that risks from contamination will be appropriately addressed through remediation; developers should ensure that they carry out adequate site investigations and risk assessments to inform their remediation strategies. These should all be prepared by competent persons²³. Further guidance on good practice in the management of land contamination can be found in the related documents. After remediation has been carried out, developers are responsible for showing the LPA that they have been successful. This could involve ongoing monitoring and the submission of verification reports.

8. The Environment Agency's Role

The Environment Agency (EA) is a statutory consultee for local plans, certain types of planning applications, and developments requiring an Environmental Impact Assessment (EIA). The Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) sets out the developments for which the Environment Agency is a statutory consultee. The EA is also a statutory consultee for Nationally Significant Infrastructure Projects (applications determined by the Secretary of State rather than LPAs).

The EA has developed guidance for local planning authorities that sets out the types of planning consultations it should be consulted on.

As a statutory consultee the Environment Agency is expected to take a proactive approach, providing advice in a timely manner at all stages in the development process (see NPPF (2019) paragraphs 16 and 40, and the Planning Practice Guidance 'Consultation and pre-decision matters').

The EA's stated main concern when land contamination is being managed under Planning, is to protect the water environment – local authorities deal with human

²⁰ NPPF para 179.

²¹ NPPF para 39, 41 & 43.

²² Often referred to as the 'pre-app stage'.

²³ NPPF Annex 2 defines 'competent persons'.

health issues. By ensuring that developers reduce or remove the risk or consequences of pollution of surface and groundwaters, the planning regime helps achievement of Water Framework Directive objectives.

CL:AIRE has issued guidance to help developers and land owners understand the concerns and requirements of the EA and other authorities. These 'Guiding Principles for Land Contamination' (GPLC²⁴) describe the approaches that developers and land owners are expected to take, what needs to be included in reports for review and the key guidance that can be referred to.

In responding to consultations from LPAs the EA provides recommendations and technical advice on:

- the likely impacts that development on land affected by contamination will have on the immediate and wider water environment;
- the impacts that contaminated water may have on the development;
- proposals for, and the outcome of, investigations and remediation;
- implications of the development for Part 2A contaminated land for which cases where the EA is the enforcing authority (special sites).

The EA will make assessments of the appropriateness and effectiveness of any measures put forward by developers to remediate contamination or any pollution caused from the perspective of protecting the water environment. Where there are technical solutions to resolve issues that would otherwise prevent a grant of planning permission the EA should, where possible, take a 'yes if' approach and explain the steps required to overcome the problems. Developers/land owners are able to obtain pre-application advice (for a charge) under the EA's cost recovery service. Developers/land owners should be directed to contact the EA should they wish to utilise this service.

An Environmental Permit may be needed to undertake certain required remediation activities. Where this occurs the EA should clearly explain to LPAs the issues that, as the regulator, they can control and not duplicate these in the details or conditions in a planning permission unless it is appropriate to do so.

9. Council owned property portfolio

CDC is a property owner of occupied, leased and open-access land, some of which has been subjected to potentially contaminative former uses. CDC has undertaken a review of its former and current land holdings and considers that no detailed inspection of any site is required at the current time.

In 2001 CDC transferred its housing stock to a housing association by a process known as Large Scale Voluntary Transfer (LSVT). Despite transferring the stock any liability arising from land contamination issues remained with CDC in perpetuity (though for clarity CDC does not have liability for contamination introduced after the date of transfer).

²⁴ The guidance can be found here -

https://www.claire.co.uk/home/news/index.php?option=com_content&view=article&id=192&catid=41&Itemid=256

Given CDC's interest in property as described in the above two paragraphs then CDC has a theoretical liability in relation to any claims arising from current occupiers or owners with respect to land both currently or previously owned by CDC or transferred via LSVT. As such CDC has monies in its reserves ring-fenced explicitly to make provision for any such claim or necessary detailed inspection, risk assessment and remediation. In the event that the provision is insufficient then CDC will seek monies from central government and then from submission of a report to the CDC Cabinet. It should be emphasised that the likelihood of such circumstances arising is considered to be small.

10. The Environmental Information Regulations 2004

The Environmental Information Regulations facilitate the public's access to environmental information held by CDC. Under the regulations there is a presumption in favour of disclosure subject to the regulations defined reasons for refusing a request for information.

Requests for environmental information are commonly made by persons transacting properties and by persons evaluating property portfolios.

CDC has a policy of transparency and openness with regards to information that it holds in regard to land contamination. Likewise it seeks to be helpful with regards to assisting persons in gathering and understanding the information and data and associated risk. This is particularly so where persons requesting the information may be very unfamiliar with land contamination as a subject. Nevertheless CDC will only help to provide the context for understanding risk, ultimately it is for the individual to make their own decisions in relation to risk as they perceive it.

CDC charges a fee for the provision of information under the regulations. The price is updated annually and published on CDC's website and fees and charges register.

11. Chichester District

11.1. Geographical setting

Chichester District covers an area of 786 square kilometres and is one of seven district and borough councils within the county of West Sussex on the south coast of England. It is bounded by Hampshire to the west, Surrey to the north, by the districts of Horsham and Arun to the east and by the English Channel to the south. Although there is urban development in the southern part of the district, the northern half is principally rural with a significant area being part of the South Downs National Park.

According to the Census 2011, the total population for the district is around 113,794 and there are an estimated 55,353 households. Approximately half of the population is located towards the south of the district in the city of Chichester or coastal towns of Selsey, Bracklesham Bay and the Witterings or along A27/A259 corridor.

The district is split into different types of landscape by the South Downs which form a ridge running roughly east – west across the middle of the district area. To the south of the Downs lies the Sussex coastal plain which is largely flat and bounded by two natural harbours, Chichester Harbour and Pagham Harbour. To the north of the Downs the land is more hilly and wooded and is crossed by the River Rother which

runs from west to east to join the River Arun which lies on the district's eastern boundary.

11.1.1. Geological and hydrogeological features

The formation of the South Downs dates from around 100 million years ago (the Cretaceous Period) with the formation of the Chalk. More recent deposits were then formed above the Chalk comprising horizontal layers such as the Reading Beds, the London Clay and the Bracklesham Beds. Around 15 million years ago these rocks were lifted into a huge dome known as the Wealden Anticline and due to erosion of the younger rocks, the Chalk became exposed along the ridge of the South Downs with younger rocks and drift deposits present to the north and south.

The Chalk acts as a natural reservoir (an aquifer) and plays an important role in supplying water to the area. Over 80% of public water supplies in the district are supplied by this groundwater reserve. To the north of the South Downs lies the Wealden Greensand Natural Area which is also underlain by an important aquifer, the Lower Greensand.

The Environment Agency Groundwater Protection Policy uses aquifer designations that are consistent with the Water Framework Directive. These designations reflect the importance of aquifers in terms of groundwater as a resource (drinking water supply) but also their role in supporting surface water flows and wetland ecosystems.

Over 50% of the district is underlain by principal aquifers which are abstracted for drinking water and other purposes. There are two main water companies responsible, Portsmouth Water and Southern Water (and a small part of the district is covered by South East Water). There are 20 public water supply abstraction points in the District and the EA has defined Source Protection Zones (SPZ) around these points to give protection to the aquifers.

In addition, secondary aquifers underlie parts of the district. These are permeable layers, capable of supporting water supplies at a local rather than strategic scale and in some cases forming an important source of base flow to rivers.

Groundwater is an extremely important water resource within the district and therefore requires appropriate protection from pollution incidents.

11.2. Hydrology

There are three principal rivers in the District: the Rother, the Ems and the Lavant and many smaller rivers and streams. Water quality is generally of moderate or poor ecological quality with a few stretches of good ecological quality. The chemical status of the sampled rivers within the district is good. Many of the rivers are known as ephemeral ie they flow only for a short time when groundwater levels are high. The main use of the rivers is for angling and both salmonid and cyprinid fish are found on certain stretches of water. In addition there are many natural and man-made ponds and lakes which are widely used for fishing and other forms of recreation/water sports.

Only around a third of the water abstraction points within the district are from surface waters and they are generally used for the following purposes: spray irrigation, process washing and other industrial uses, fish farming and other

agricultural/horticultural purposes. A small minority of the abstractions are used for household purposes which may include drinking.

There are 75 Private Water Supplies that serve a permanent resident population of around 2164 but when temporary events are held (such as the Festival of Speed), the population served swells to over 50,000. Eight supplies are classified as large/commercial supplies where water is used in a way that may impact on the general public such as for domestic use or food production. The sources of water include springs, boreholes, surface water, boreholes and rainwater harvesting. In addition there is a mineral water company which is supplied by an on-site borehole.

Although surface water resources within the district are not generally used for drinking water directly, given the large number of agricultural abstractions and fisheries and private water supplies, there is potential for pollution entering surface waters to enter the food chain and thus any areas of potentially contaminated land near surface water features will need to be assessed carefully.

The district has approximately 70km of coastline of which 25km front the sea, 40km are within Chichester Harbour and the remainder are within Pagham Harbour. The Bathing Waters Directive provides the primary control for long-term coastal water quality where most people are likely to bathe.

The district's location on the coast, the low-lying flood plain, land drains and culverts all provide an increased risk of flooding. Flooding can cause damage, mobilise pollutants and spread existing contamination more widely affecting people and property. Marine pollution incidents may cause contamination along coastal and estuarine areas. Risks from contamination will be considered if any such incidents occur.

11.3. Areas of Special Interest and Ecology

The district contains an exceptional range of natural habitats and natural areas which includes sites that are of national and international importance for nature conservation. The council has published its Local Biodiversity Action Plan (LBAP) which brings together the Council's planned activities to protect our local biodiversity. The Council's LBAP links to the Sussex Biodiversity Action Plan which in turn delivers the UK Biodiversity Action Plan.

A summary of the number of sites represented in the district is given below, and further information about what constitutes harm to such receptors is provided in Table 1 of the Statutory Guidance:

- Sites of Special Scientific Interest - 40
- National Nature Reserves/Local Reserves – 9 Local and 2 national
- Special Areas of Conservation – 7 sites
- Special Protection Areas - 3
- RAMSAR sites - 2
- National Parks -1

Ecological value will be taken into consideration when sites are investigated, developed and remediated.

11.4. Built environment and protected properties

The South Downs were among the first parts of Britain to be colonised and there are around 200 Scheduled Ancient Monuments, over 3000 Listed Buildings and 85 Conservation Areas within the District. Further information is available by consulting the Historic Environment Record (HER) which is a summary of known historic assets within the district.

Where contamination leads to significant harm to a property, particularly a scheduled Ancient Monument, then an assessment should be carried out to establish if a significant pollutant linkage has resulted (as detailed in Table 2 of the Statutory Guidance).

11.5. Historical and industrial development

The historic and current land use patterns that have occurred across the district will have influenced the likelihood and pattern of contamination present.

Industrial activities carried out by early settlers (eg Romans and Saxons) included iron making carried out in the northern (Wealden) area. This industry had a great demand for wood so forestry and coppicing were other key rural industries. Settled areas required construction materials for house building so quarrying for stone, sand, clay and gravel also occurred along with the manufacture of bricks, pottery and tiles. The fertile southern part of the district has been used for farming and in many areas this land use continues. Along the south coast, trades such as ship and boat building, paper making and printing were prevalent. There are a number of former and existing military sites within the district, some of which have since been redeveloped. Since the mid-19th century and the construction of railways, tourism has become a growth industry.

The main current employment sectors in the district are public administration, education and health. "Distribution, hotels and restaurants" and "banking, finance and insurance" are other important employment sectors. The economy is diverse with boat building to the south of the district, Princes packaging plant in the centre of the city, Rolls Royce Headquarters at Goodwood, cement batching plants, brickworks and an inshore oilfield. On the fertile plains to the south of the Downs, arable crop farming and intensive salad/vegetable production employ a high number of workers.

The growth in population, particularly in the last 100 years has meant a large demand for domestic waste disposal sites which in turn have been provided by vacant minerals sites, particularly in the Chichester area. In the rural areas where mains gas is not always readily available, a significant number of people rely on heating oil which is generally stored in above ground tanks. Spillages and leaks from such systems are known to have caused localised pollution.

Key potential sources of contamination within the district are those associated with former and existing landfill sites. Many landfill sites were operated prior to the Control of Pollution Act 1974 which introduced regulatory controls on such sites.

Sites such as former gas works and other utilities, petrol stations/garages, railways and transport depots, military sites, scrap yards and sewage/waste water treatment

works are considered likely to be contaminated and will require site investigation and possibly remediation prior to redevelopment.

12. Responding to requests for information

CDC acts in accordance with the requirements of the following statutes and regulations in making environmental information available to the public:

- Local Government (Access to Information) Act 1985
- Data Protection Act 1998
- Human Rights Act 2000
- Freedom of Information Act 2000
- Environmental Information Regulations 2004
- Openness of Local Government Bodies Regulations 2014

We operate with a presumption in favour of disclosure subject to the relevant tests and exclusions of the above legislation.

CDC holds a public register for land remediated under the Part 2A regime which is available on-line.

We charge for our responses made under the Environmental Information Regulations 2004. Our charges are published on the CDC website and updated annually.

13. Risk Communication

CDC is mindful of the technical nature and legal complexity of the subject of 'land contamination'. As such the council will seek to communicate in language that reflects the knowledge set of the audience.

Likewise land contamination issues can relate to the potential for serious harm to humans and other receptors. It can also potentially cause blight on property values. As such CDC seeks to be sensitive in its communications using language that, whilst accurately conveying the detail of any relevant situation, will be sensitive to the recipients and does not cause property blight.

14. Strategy Review

Annual progress will be reported through the Covalent reporting software. This Strategy will be reviewed in 2025²⁵.

²⁵ Or earlier if circumstances dictate.

Appendix 1

Table 1: Part 2A Inspections²⁶ carried out by CDC (since 2001.)

Site name	Inspection summary
Thorney Island military base	The site was sprayed ²⁷ with DDT (carried in used engine oil and benzene) from 1934 to the 1970's. This was by way of tackling the mosquito problem which affected the operability of the RAF base there at that time. There was also unlicensed landfilling of waste and land-reclamation behind the sea wall in order that mosquito breeding habitat was removed. The investigation was managed by a partnership between the EA, CDC and the MoD. As DDT ²⁸ had not been assessed in the UK before then the work involved Detailed Quantitative Human Health Risk Assessment (DQRA). The work resulted in some small scale remediation of residential properties and the sailing club and The site was then signed off as fit for use with some minor restrictions in 2008.
Pitsham Wood housing development	This housing development was built on an old landfill in the early 1970's. CDC had received complaints from a resident which suggested the possibility of landfill gas ingress into the properties. CDC accessed DEFRA contaminated land grant monies to commission an investigation of the properties considered likely to be most affected. Residents of the development were engaged and consultants took soil samples and measured gas levels across the site. A DQRA subsequently signed the site off as fit for use (with no remediation).
Florence Road allotments	The allotments were built on an old landfill site. Working in partnership with Chichester City Council a contaminated land investigation was carried out in 2005. A QRA established that some sites were a risk to human health and were decommissioned in perpetuity. A public meeting informed the allotment holders of the findings and actions.
Pebble Beach, Caravan Park	This caravan park is located at the site of the former Selsey Gas Works site. During some minor site works CDC received a query from a caravan/chalet owner about the soil quality. CDC procured a consultant to carry out a land

²⁶ The DEFRA grant enabling pro-active site inspection ceased in 2017.

²⁷ DDT was applied to the land by 'aerial dusting' and by hand from back-pumps.

²⁸ And its breakdown products DDD and DDE.

	quality investigation and risk assessment. Some minor remedial works were recommended and the site discharged as fit for its current use.
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Appendix 2:

Consultees:

Key partner organisations:
Chichester Harbour Conservancy
Council for the Protection of Rural England
DEFRA
English Heritage
Natural England
Environment Agency
Food Standards Agency
Health and Safety Executive
Local government:
Arun District Council
East Hampshire District Council
Havant Borough Council
Horsham District Council
Waverley Borough Council
West Sussex County Council
National Park:
Southdowns National Park
Community Groups:
Chambers of Commerce
Transition Chichester
Major landowners:
Goodwood Estates
Crown Estates
Portsmouth Water
Southern Water
Thames Water

Appendix 3: Glossary of terms:

ArcGIS	A proprietary digital mapping software.
CDC	Chichester District Council.
CL	Contaminated Land.
Class A Person	A person who knowingly caused or permitted a pollutant linkage.
Class B Person	The owner or occupier of land on which a pollutant linkage exists.
CLT	Contaminated Land Officer.
DECC	Department of Energy and Climate Change.
DEFRA	Department of Food and Rural Affairs.
DQRA	Detailed Quantified Human Health Risk Assessment.
EA	The Environment Agency.
EPA 90	Environmental Protection Act 1990.
LPA	Local Planning Authority.
NPPF ²⁹	National Planning Policy Framework.
Orphan Linkage	A linkage where no Class A or Class B person can be found.
QRA	Quantified Human Health Risk Assessment.
SDNP	South Downs National Park.
Special Site	Sites defined in the guidance and legislation where the EA will be the lead agency and enforcing authority.
Statutory Guidance	Environmental Protection Act 1990 Part 2A, Contaminated Land Statutory Guidance, DEFRA, April 2012.
Uniform	CDC's property database.
Strategic inspection	Collecting information to make a broad assessment of land within an authority's area and then identifying priority land for more detailed consideration and/or inspection.
Detailed inspection	Carrying out a detailed inspection of a particular piece of land to obtain information on ground conditions and carrying out the risk assessments which support decisions under the Part2A regime relevant to that land.

²⁹ All references to the NPPF in this document refer to the NPPF February 2019.

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Determination of Taxbase 2021-22
Appendix 1

	Band@	Band A	Band B	Band C	Band D	Band E	Band F	Band G	Band H	Total
Chargeable properties *	4.3	2,317.4	5,164.8	12,914.8	10,804.8	7,976.3	5,524.3	5,318.0	1,156.5	51,180.9
Band D equivalents	2.4	1,544.9	4,017.0	11,479.8	11,086.6	9,748.8	7,979.5	8,863.3	2,313.0	57,035.3
Additional 50% income for prescribed classes A & B (Second Homes) as Band D equivalents**	0	194.7	91	212.4	262.5	259.7	271.6	352.5	166	1,810.4
Additional Income for Empty Homes Premium										147.5
Taxbase deduction for Council Tax Reduction										-4,464.1
Total Taxbase for the Chichester District for 2021-22										54,529.1
Adjusted for assumed collection rate of 99%										53,983.8

Note;- All calculations are subject to roundings

Notes

* Includes adjustments for Crown Property and property with restricted planning permission. Adjusted for roundings

**For calculation purposes

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Determination of Taxbase 2021/22

Appendix 2

Parish	Basic Taxbase Second Homes 50%	Second Homes additional 50%	Basic Taxbase for 2020-21	Additional income from Empty Homes Premium	Taxbase deduction for Council Tax Support	Total Taxbase	Adjusted for assumed collection rate of 99%
Appledram	91.9	4.1	96.0	0.0	-6.1	89.9	89.0
Barlavington	53.1	3.1	56.2	0.0	-2.0	54.2	53.7
Bepton	147.5	5.9	153.4	2.2	-0.9	154.7	153.2
Bignor	68.3	6.8	75.1	0.0	-2.8	72.3	71.6
Birdham	854.5	38.9	893.4	0.0	-47.5	845.9	837.4
Bosham	1,617.8	115.2	1,733.0	0.0	-86.9	1,646.1	1,629.6
Boxgrove	503.0	12.1	515.1	0.0	-49.8	465.3	460.6
Bury	367.8	14.4	382.2	2.0	-18.2	366.0	362.3
Chichester City	12,339.8	226.9	12,566.7	39.2	-1,337.7	11,268.2	11,155.5
Chidham & Hanbrook	1,061.4	12.3	1,073.7	2.7	-74.9	1,001.5	991.5
Cocking	232.8	3.8	236.6	0.0	-15.1	221.5	219.3
Compton	221.0	11.0	232.0	0.0	-5.9	226.1	223.8
Donnington	1,070.6	10.2	1,080.8	1.2	-44.4	1,037.6	1,027.2
Duncton	229.6	8.3	237.9	0.0	-6.9	231.0	228.7
Earnley	291.6	60.0	351.6	0.0	-10.1	341.5	338.1
Eartham	48.6	4.1	52.7	0.0	-3.0	49.7	49.2
Easebourne	1,126.7	23.2	1,149.9	15.3	-67.6	1,097.6	1,086.6
East Dean	118.9	7.3	126.2	0.0	-13.4	112.8	111.7
East Lavington	118.8	7.1	125.9	3.2	-2.6	126.5	125.2
E.Wittering & Bracklesham	2,303.3	144.2	2,447.5	2.0	-257.7	2,191.8	2,169.9
Ebernoe	130.6	6.4	137.0	0.0	-1.0	136.0	134.6
Elsted & Treyford	161.1	9.2	170.3	6.7	-7.6	169.4	167.7
Fernhurst	1,406.1	22.1	1,428.2	1.0	-80.0	1,349.2	1,335.7
Fishbourne	1,143.9	8.3	1,152.2	0.0	-68.0	1,084.2	1,073.4
Fittleworth	543.3	15.1	558.4	0.8	-20.9	538.3	532.9
Funtington	838.4	21.7	860.1	0.0	-32.2	827.9	819.6
Graffham	325.5	14.2	339.7	8.1	-14.0	333.8	330.5
Harting	740.5	26.7	767.2	0.0	-47.5	719.7	712.5
Heyshott	162.7	11.6	174.3	0.0	-9.2	165.1	163.4
Hunston	493.3	4.6	497.9	0.0	-74.0	423.9	419.7
Kirdford	517.0	15.1	532.1	1.4	-28.4	505.1	500.0
Lavant	757.2	16.0	773.2	0.0	-78.7	694.5	687.6
Linch	42.3	2.5	44.8	0.0	0.0	44.8	44.4

Determination of Taxbase 2021/22

Appendix 2

Parish	Basic Taxbase Second Homes 50%	Second Homes additional 50%	Basic Taxbase for 2020-21	Additional income from Empty Homes Premium	Taxbase deduction for Council Tax Support	Total Taxbase	Adjusted for assumed collection rate of 99%
Linchmere	1,072.7	10.9	1,083.6	1.2	-33.6	1,051.2	1,040.7
Lodsworth	375.2	20.0	395.2	6.2	-6.0	395.4	391.4
Loxwood	839.8	9.5	849.3	0.0	-35.1	814.2	806.1
Lurgashall	335.9	22.3	358.2	5.0	-10.7	352.5	349.0
Marden	54.5	4.1	58.6	0.0	-2.1	56.5	55.9
Midhurst Town	2,491.4	31.1	2,522.5	0.0	-242.9	2,279.6	2,256.8
Milland	477.3	23.6	500.9	0.0	-10.5	490.4	485.5
North Mundham	644.0	14.1	658.1	0.0	-49.9	608.2	602.1
Northchapel	357.5	3.6	361.1	0.0	-34.2	326.9	323.6
Oving	667.0	12.1	679.1	6.0	-50.5	634.6	628.3
Petworth	1,399.7	35.4	1,435.1	16.4	-134.3	1,317.2	1,304.0
Plaistow & Ifold	1,140.6	14.2	1,154.8	0.0	-21.3	1,133.5	1,122.2
Rogate	809.5	20.3	829.8	0.0	-35.0	794.8	786.9
Selsey Town	4,688.9	213.2	4,902.1	6.1	-513.9	4,394.3	4,350.4
Sidlesham	630.7	25.0	655.7	0.0	-43.0	612.7	606.6
Singleton	256.9	14.3	271.2	0.0	-17.5	253.7	251.2
Southbourne	2,867.9	39.3	2,907.2	5.6	-224.0	2,688.8	2,661.9
Stedham with Iping	442.8	16.5	459.3	1.2	-26.6	433.9	429.6
Stopham	50.6	1.0	51.6	0.0	-3.1	48.5	48.0
Stoughton	339.0	14.6	353.6	0.0	-13.4	340.2	336.8
Sutton	116.0	11.1	127.1	0.0	-1.8	125.3	124.0
Tangmere	1,250.0	7.0	1,257.0	0.0	-143.0	1,114.0	1,102.9
Tillington	302.3	15.3	317.6	0.0	-16.8	300.8	297.8
Trotton with Chithurst	161.3	1.9	163.2	0.0	-8.5	154.7	153.2
Upwaltham	15.5	0.0	15.5	0.0	0.0	15.5	15.3
West Dean	217.6	10.4	228.0	2.3	-14.4	215.9	213.7
West Itchenor	350.1	52.8	402.9	6.0	-2.3	406.6	402.5
West Lavington	162.5	3.6	166.1	0.0	-5.2	160.9	159.3
West Thorney	229.4	0.0	229.4	0.0	0.0	229.4	227.1
West Wittering	1,652.9	227.2	1,880.1	2.4	-84.7	1,797.8	1,779.8
Westbourne	1,024.3	16.8	1,041.1	0.0	-89.4	951.7	942.2
Westhampnett	598.6	5.9	604.5	1.7	-35.4	570.8	565.1
Wisborough Green	789.5	18.3	807.8	1.6	-33.3	776.1	768.3
Woolbeding with Redford	94.5	2.6	97.1	0.0	-6.7	90.4	89.5
Totals	57,035.3	1,810.4	58,845.7	147.5	-4,464.1	54,529.1	53,983.8

Chichester District Council

Homelessness Prevention and Relief Policy

1. Introduction

This document sets out the general principles for providing funding under the Chichester District Council Homelessness Prevention and Relief Policy (HPRP)

This policy supports and is to be read alongside the Council's Discretionary Housing Payment Policy (DHP) and the service level agreement with Stonepillow for the provision of furniture packs under the Crisis Furniture Support Project. It should also sit alongside the Council's Debt Recovery Policy. The Council's Allocations Scheme will also be relevant in cases which revolve around access to the Housing Register.

It is also supported as part of the Council's Community and Housing Covid Recovery Plan.

2. Aims

To provide flexible, bespoke, financial assistance via the HPRP to prevent or relieve homelessness for residents with whom the Council (or its key partners) is actively working.

Based on the principle that the policy is drafted so that it is broad enough to be applicable to almost any situation which may arise and to allow the budget holder/approver to exercise judgement in relation to specific cases.

3. Objectives

The objectives of the policy are:

- To help with housing related debts which **prevent** people moving into a suitable home, to free up short stay accommodation and/or to reduce costs to the council
- To assist those who are **not eligible** for Discretionary Housing Payments (DHP) eg for rent in advance and tenancy deposits
- To provide financial assistance to **access** housing eg payment of incentives, removal/relocation costs or where a landlord will not accept the Council's deposit bond scheme provided via the Homefinder Service.
- To provide other financial assistance to **retain** housing eg landlord payments to meet arrears or bolster deposits.
- To **reduce** costs to the Council eg on an invest to save basis
- To **enable** a flexible, bespoke, 'what matters is what works' approach on a person centred basis

4. Priority groups for assistance

- Residents moving out of nightly paid accommodation eg B and B or Westward House
- Rough sleepers actively working with the Rough Sleeper Team and/or partner agencies such as Stonepillow
- Anyone coming to the council under the Homelessness Reduction Act who is actively working and co-operating with the housing advice team

5. Other considerations

- That those being helped are in genuine financial hardship and are actively working with the council's services (eg housing, housing benefit, rough sleeper) and its partner agencies eg debt and money advice services to resolve their situation.
- Applicants will need to agree to providing evidence of income/savings, debts and/or agree to a credit search, and in addition to be claiming all the income and welfare benefits they are entitled to.
- For access to the Housing Register, once financial issues have been resolved, applicants would then need to be eligible (ie have no other factors rendering them ineligible for the Housing Register)
- It is in our interest to make sure that people can move on from hostel, specialist or supported housing and the policy will be part of the tool box giving officers the ability to unblock obstacles to getting people rehoused where there is seems to be appropriate as part of a long term solution.
- Funding made under this policy must not generate unintended consequences eg where a resident deliberately makes no payments or does not attempt to address housing related debts in the belief that the council will make these payments for them. Agreements can be made under this scheme to meet a proportion of the debts on the basis the resident/friend/relative/guarantor meets the remainder.
- There is no upper limit on any total award under this policy although in general it would not be expected to often exceed £5,000. The invest to save assessment will work very differently for different types of applicant so a payment to prevent or relieve homelessness for a family of ten would be very different to that for a single person. Discretion rests with the budget holder/approver.
- An assessment will need to be made where housing related debts could be resolved via this policy but the applicant still has one or more secondary debts eg loans, council tax arrears.
- A case by case view will be needed if the applicant has prioritised non-essential expenditure over rent, mortgage and/or service charges.

6. Recommendations, approval and budget holder

- The budget holder is the Housing Options Manager and they or the Divisional Manager for Housing will approve applications.
- Recommendations and requests under this scheme can be made by any officer in Housing Services or a support worker from a partner organisation working with the same client group for example Stonepillow
- Payments are made to the creditor rather than direct to the resident. Those organisations, individuals or landlords who will be in receipt of a grant under this policy may already be known to the Council and set up as creditors. Those that aren't will complete a new supplier form (or the on line e-form when launched) to confirm their details including banking details. The grant requisitioner will complete a payment request form with sufficient supporting documentation to evidence and justify the request. This will then be reviewed and authorised as appropriate by those delegated to approve payments under the policy.

7. Monitoring and record keeping

- Accurate records must be kept for all decisions and payments made under the scheme to ensure a valid audit trail.

8. Review

- The scheme will be reviewed on an annual basis or at the point the budget reduces to below £10,000, whichever is the sooner.
- An assessment will be made of the outcomes, impact and effectiveness of the policy particularly where it can be demonstrated that the 'spend to save' principle has been achieved and whether there is a need to identify further funding.

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Project Documentation - Initial Project Proposal Document

Project: Future Customer Services face-to-face delivery

Author: Kerry Standing, Divisional Manager – Revenues, Benefits and Customer Services

1. Project Description

This report sets out details of proposals to remodel access arrangements for services provided by the Customer Services Centre (CSC) which supports residents and promotes online service delivery and efficiencies. The changes include moving away from a tradition face to face service whereby residents queue up and receive tickets to a modern offering which includes floor walkers who meet and greet residents and visitors, assisting those using self-service PCs, signposting and responding to enquiries.

This model is similar to that of banks and frees up staff capacity to support the most vulnerable residents helping to educate and encourage residents who are able to use on line services. The changes directly support and build on work undertaken to date to make it easier for residents to access Council services and information through digital channels. Additionally these proposals help to better manage customer demand and support individuals to become more resilient.

In scope:

The Customer Services Centre at East Pallant House

Out of scope:

East Pallant House office space and building

This project meets an identified need in the Council’s Organisational Recovery plan. Specifically in relation to supporting on line service delivery for residents who may not be able to transact with the Council on line or where an initial level or ongoing level of support is required to help and assist residents in using the Councils on line services. Additionally by adopting this operating model there are potential savings of approximately £55k per annum which can be achieved subject to a restructure.

The Covid-19 pandemic has drastically changed the way residents are contacting the Council. Prior to Covid-19 the Council had seen some in roads into residents using online services but nothing to the extent of what we have experienced since Covid-19.

We now have the potential to transform our Customer Service Centre into a modern service delivery model for the future.

Customer services by channel data

Channel	01/04/19 - 31/07/19	01/04/20 - 31/07/20
Telephone calls (presented)	53,921	44,805
Face-to-face	9,489	132
Website	192,511	282,000
Total	255,921	328,074

If the CSC was re-opened as it operated pre Covid-19 we will lose all the momentum gained over the past 6 months. Residents have shown that where they need to they will use online services and we now need to capitalise on this.

2. Outcomes to be Achieved

- < A newly re-modelled CSC with prominent and improved signage promoting digital channels and on line payments;
- < Prominent floor walkers (fully trained Customer Service Officers) who meet and greet residents and visitors, signpost and offer help and advice;
- < Appointments offered for enquiries that cannot be resolved on line or via telephone, particularly where the customer is identified as vulnerable and unable to use on-line facilities with assistance;
- < Identification and understanding of what further needs to be done to include and support vulnerable residents who are unable to transact with the Council on line;
- < By implementing this proposal a saving of £55k per annum can be delivered after initial project costs and the timing is subject to a restructure.

3. Timescales

Action required	Delivery date
Consultation and engagement at Organisational Recovery Group	28 August 2020
Proposals drawn up for reconfigured Customer Service Centre and associated costs determined	9 September 2020
IPPD and proposals taken to SLT	9 September 2020
Report to Overview and Scrutiny taken and approval sought	November 2020
Report to Cabinet taken and approval sought	December 2020
Re-modelling of the Customer Service Centre takes place	December 2020 / January 2021
Re-configured Customer Service Centre opens	January 2021
Staffing restructure	Autumn 2021

4. Project Costs and Resources

Costs (£)		Source
One-Off	Signage, IT equipment and building works TBC estimated at £10k	Operational budget
Revenue		
Savings	£55k (subject to a restructure)	
Services engaged with and involved in the project delivery	Revenues, Benefits and Customer Services Housing Licensing Planning Parking Facilities Information Technology Health & Safety	

	Human Resources for restructure purposes
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5. Benefits vs. Cost

Year	Out	In	Balance	Payback
1	£10,000	£0	-£10,000	
2	£0,000	£00,000	£0,000	
3	£0,000	£55,000	£45,000	Savings from 2022/23
4	£0,000	£55,000	£90,000	
5	£0,000	£55,000	£145,000	
5 Year Total			£145,000	

6. Identify Risks

Risks	Mitigating actions
Project not delivered on time	Project management delivery approach used and regular project meetings to take place to track and monitor project delivery, remove blockages and barriers.
Project not delivered within agreed budget	Project costs coming out of the operational budget for Revenues, Benefits and Customer Services and all costs monitored to ensure project delivered within budget.
Residents do not buy into new service operating model	Publicity of the new service model will be promoted in advance of the reconfigured CSC opening. Success stories will be promoted and residents will be welcomed upon arrival, supported and educated as far as is reasonably practicable to use the Councils online services. Learn from feedback received and implement improvements.
Officers do not buy into new service operating model	Managers engaging with officers from the beginning right through the project process and involve them in service design. Managers are open to ideas, challenges and questions and use ideas and feedback to form ultimate re-design.

7. Appendix

A. Customer Services survey

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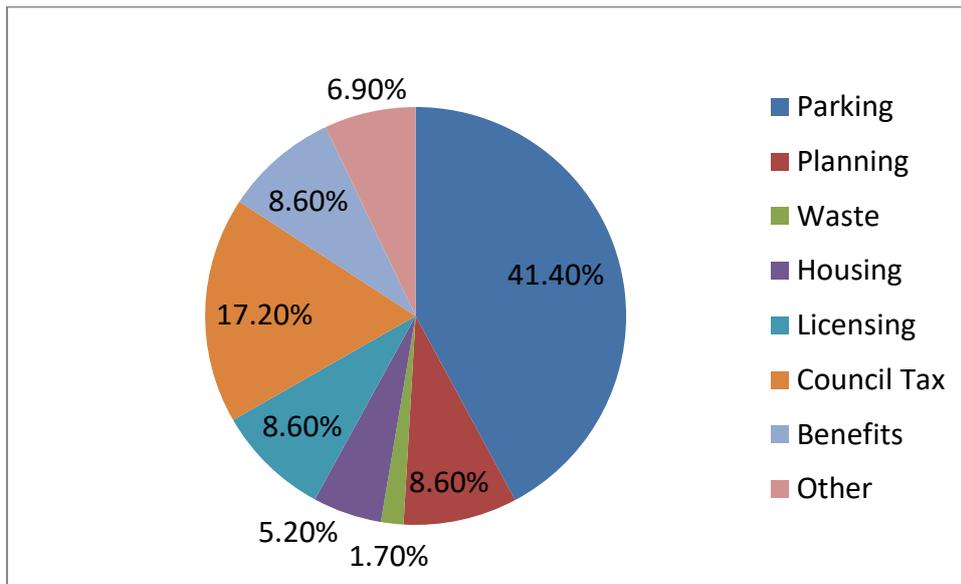
Appendix 2 - Customer Services survey results

A Customer Services survey was initiated in August 2020 to obtain feedback from residents following their experience with the Council.

A total of 59 customers have been asked for their feedback to date. This has been completed via residents over the telephone or through an online service which has been emailed to them. This survey continues throughout October and November 2020.

Below is a summary of the reasons in which residents have contacted the Council.

Table 1 – Residents who contacted the Council by service type



Results to date are positive with the following highlights: -

Table 2 – Residents response to “when we answered your enquiry, were officers friendly and approachable?”

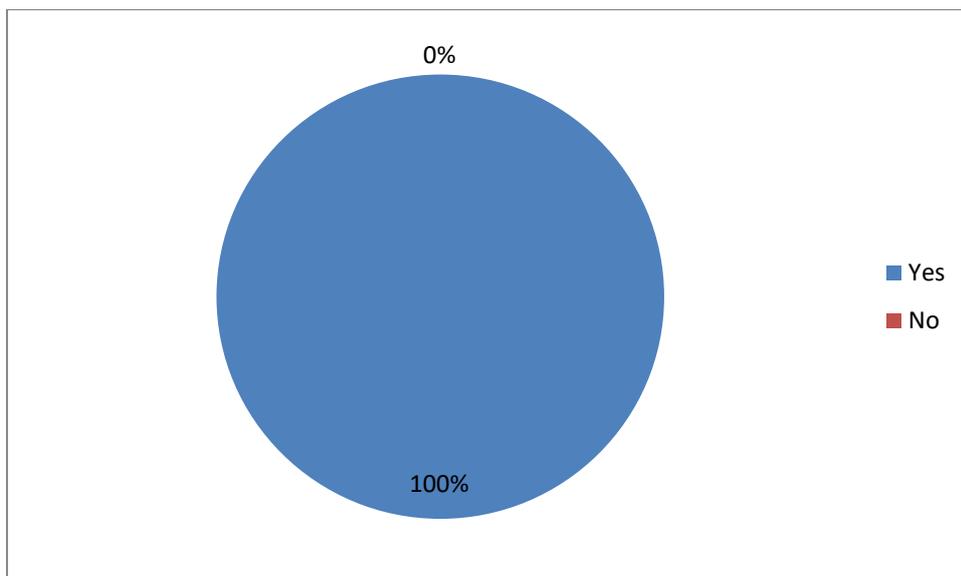


Table 3 – Residents confirmation as to whether they have used the Council’s website and online services

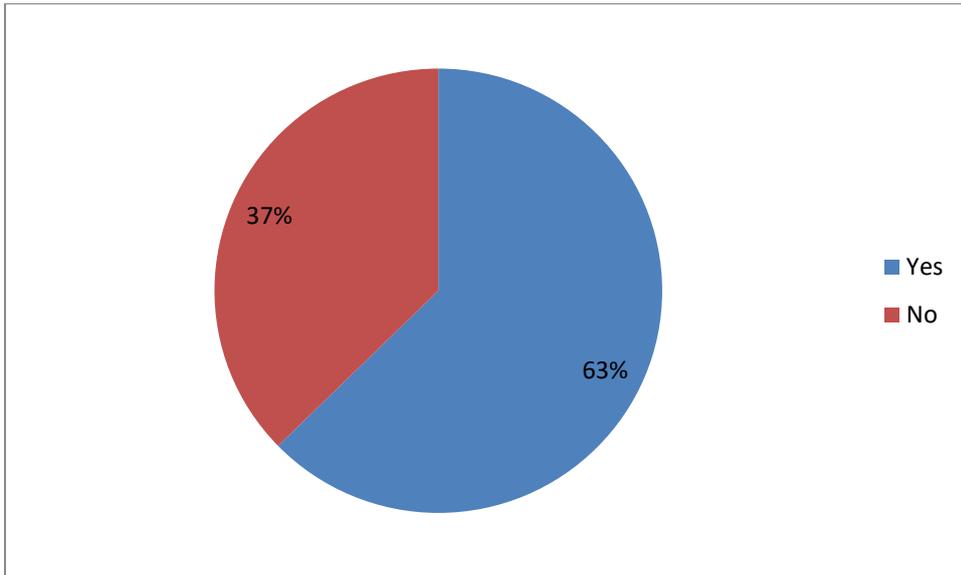


Table 4 – Residents response to “if you normally visit East Pallant House regarding your enquiry, were you satisfied with the service you received by telephone/online instead?”

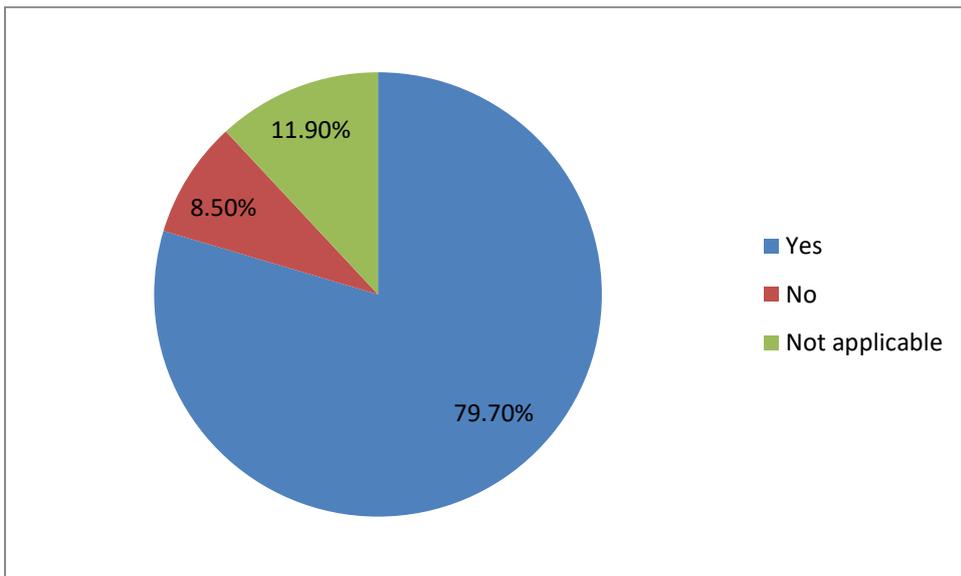
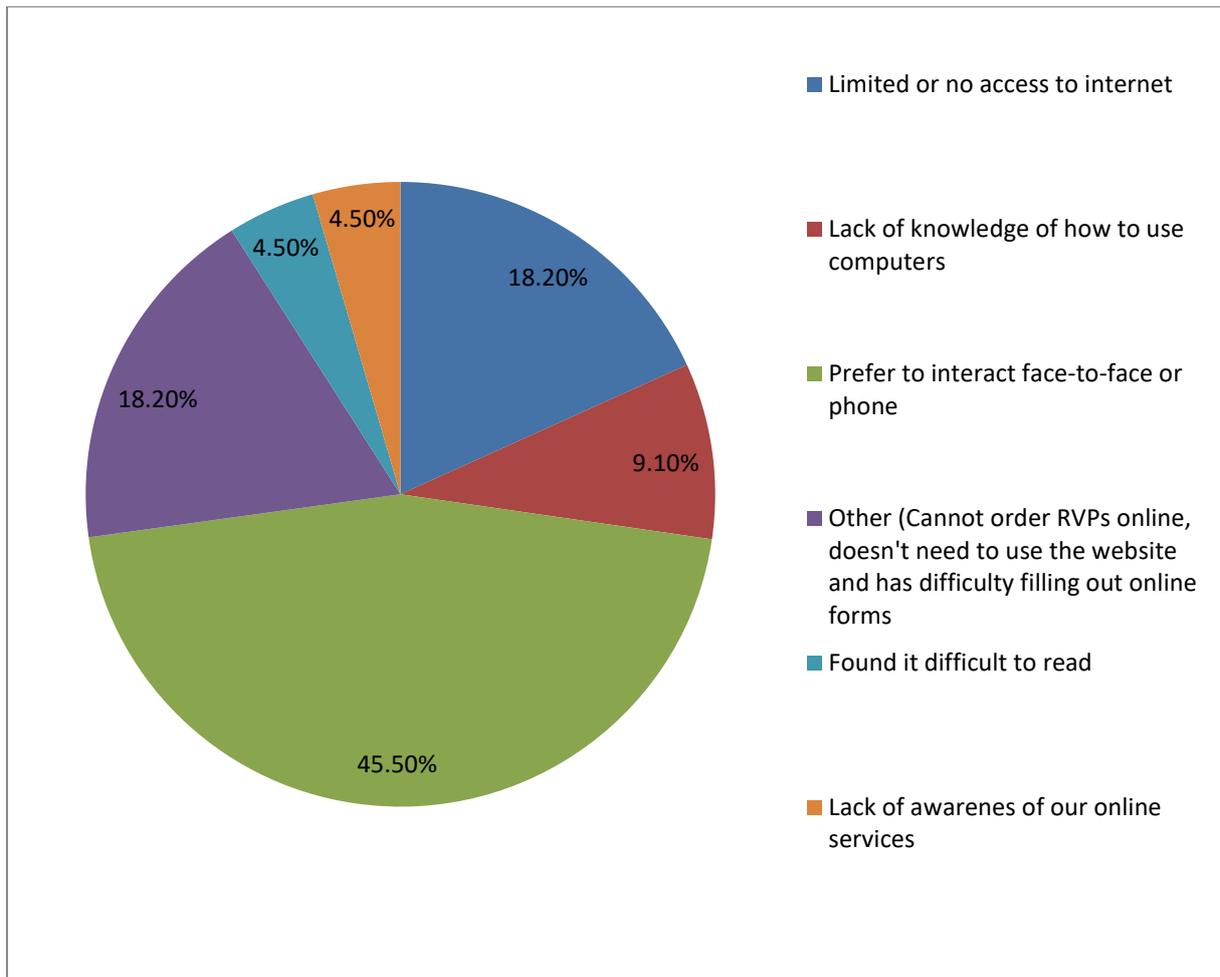


Table 5 - Reasons for not using the Council's website and online services



Reasons for not being satisfied include: -

- A little bit longer with e-mailing documents than telephoning, but otherwise all gone well;
- missed coming in;
- disappointed that she cannot have a larger bin therefore having to purchase excess waste sacks;
- a bit long-winded and made it more complicated than necessary;
- can't get on line;
- Have left several messages for call back from Housing Officer and not returned. Really miss not being able to come into offices to speak with someone face to face.

As part of the survey residents were asked what improvements could be made to support them when using the Council's online services. The following responses were received and work is underway to make improvements: -

- I would like to suggest click and collect system perhaps, when you order online and can collect from somewhere, but I understand that may be more complex to organize at the moment.
- An option to purchase Visitors Permits when you login to your council tax account would be nice
- Not able to purchase excess waste sacks online - it would help.
- Re proof of address for parking as more things are digitalised so harder to provide
- The only thing that would make life easier would be If we could buy more than 5 RVP's at 1 time
- could be easier to download information
- Making possible to purchase visitors permits online.
- RVPs on line or more info to say that you can't get them on line and to call
- Couldn't find information about how to get RVPs on the website so that could be clearer
- Amend direct debit mandate was hidden on the website so if I had seen this straight away would not have telephoned
- Make the student disregard more visible as it was quiet buried on the website and completed wrong form applying to pay the CT.
- Don't want to use online because of difficulty filling out forms.

Equality Impact Assessments - Guidance for services

We have a legal duty to undertake equality impact assessments for race, disability and gender at the start of any new projects or policies, major changes in service delivery or any potential removal of services. Assessing the equality impact is something that most of us do without thinking about it, for example consideration of how people access any service that we provide or ensuring that certain groups do not face any barriers to what we are providing is often part of our everyday consideration. This thought process must however be documented as we may need to show it as evidence.

There are three possible impacts to consider as part of the assessment:

A positive impact

Where a policy, service or project improves equality of opportunity. For example providing an interpretation service for people where English is not their first language will enable them to understand and use our services

A negative or adverse impact

Where the policy, service or project disadvantages one or more of the equality groups. For example an event held with no induction loop facility would have a negative impact on some attendees with hearing impairments.

A neutral impact

Where a policy, service or project has similar impact upon equality groups whether they belong to an equality group or not.

How to carry out an Equality Impact Assessment

For each policy or project that you are assessing you should think about all of the strands of equality and consider the areas of:

- **Accessibility**
 - Physical Facility Audit
 - Transport issues
 - Cost
 - Activity (involvement)
 - Equipment

- **Staff Training**
 - Disability Awareness
 - Equalities / Diversity
 - Service Specific

- **Monitoring**
 - Data Collection
 - Evaluation
 - Feedback and resulting adjustments in service delivery

- **Consultation**
 - In accordance with consultation strategy and guidance
 - Various appropriate methods of consultation

- **Communication**
 - Link and knowledge exchange with internal equalities team
 - Various methods of communicating where appropriate
 - Plain English
 - Information Distribution
 - In accordance with new Communication Strategy

Initial questions

Are monitoring stats available? How could monitoring be collected in future?

Any good practice examples available on diversity in this subject area?

What are the main activities of the policy and areas of work that it will involve?

Who are the main beneficiaries of the policy?

List any changes that you may be expecting to make to the policy over the next year

Documentation of Equality Impact Assessment

Name of Policy, service, project, decision; **Future Customer Services delivery**

a) Does the policy affect men and women in different ways?

You should consider any impact both men or women.

	Positive impact	Negative impact	Neutral	Reason
Gender	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposed changes will not affect men and women in different ways.

b) Does the policy affect people from different racial groups?

You should consider the impact on all racial groups, this includes gypsies and travellers.

	Positive impact	Negative impact	Neutral	Reason
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	It is anticipated that the proposed changes will not affect people from different racial groups.

c) How will the policy impact on people with disabilities, e.g. if information about Council Tax benefits are not made available in large print or alternative formats, access to such benefits might be denied to people with a visual impairment or learning disability.

You should consider those with impairments such as mobility, sight, hearing, learning disabilities and mental health issues.

	Positive impact	Negative impact	Neutral	Reason
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Some vulnerable residents accessing our face to face service could potentially be affected. However, as the current service offer for such residents will continue, no adverse impact is currently anticipated. The proposed changes still enable customers to get help and support from Customer Services Officers who are trained to support customers with disabilities. This includes but is not limited to: printing off documents in large fonts, seeking help for customers via the Royal National Institute for Blind and British Deaf Association, helping with access needs.</p> <p>Additionally there will be improved signage on TV display equipment to allow for signage and messaging which is beneficial to customers with a visual/ hearing impairment. There is also access available to the translation services where required to support residents who require this.</p>

d)

	Positive impact	Negative impact	Neutral	Reason
Any other equality impact (all other Protected Characteristics)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Age: Customers of pensionable age who are unable to access and use online services this proposal seeks to provide additional assistance as required.</p> <p>Disability / long term health conditions: People with mobility difficulties will be supported and provided with seating and / or space for their wheel chair to make them as comfortable as possible.</p> <p>I have considered all other protected characteristics and it appears to me that this would be at best a neutral impact. The other protected characteristics refer to sexual orientation, sex, gender reassignment, race, religion and marriage and civil partnerships.</p>

Overall impact Low Medium High

Actions to be taken as a result of this impact assessment

- Equalities and diversity monitoring to take place once the Customer Service Centre is re-opened to enable improved analysis in future
- Refresher training for Customer Services Officers to include but not limited to Mental Health Awareness and Disability Awareness. Courses to date have been attended but it is important to refresh skills. All officers have also attended Personal Safety training. As further training needs are identified, appropriate training will be arranged and provided.
- A register to be compiled which records officers who can speak additional languages and be available to assist customers when visiting the Customer Services Centre or when contacting us by telephone.

Any other comments

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