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15 July 2026

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CHIEF EXECUTIVE
Doug Wilkinson

Dear Councillor

You are summoned to attend the meeting of the;

STRATEGY AND RESOURCES COMMITTEE

on **THURSDAY 23 JULY 2026** at **7.30 pm**

in the **Council Chamber, Maldon District Council Offices, Princes Road, Maldon.**

Please Note: All meetings will continue to be live streamed on the Council's YouTube channel for those wishing to observe remotely. Public participants wishing to speak remotely at a meeting can continue to do so via Microsoft Teams.

To register your request to speak / attend in person please complete a Public Access form (to be submitted by 12noon on the working day before the Committee meeting). All requests will be considered on a first-come, first-served basis.

A copy of the agenda is attached.

Yours faithfully

Chief Executive

COMMITTEE MEMBERSHIP:

CHAIRPERSON	Councillor A Fittock
VICE-CHAIRPERSON	Councillor M G Bassenger
COUNCILLORS	J R Burrell-Cook S Dodsley J Driver M F L Durham A S Fluker K M H Lagan S J N Morgan U G C Siddall-Norman P L Spenceley

AGENDA
STRATEGY AND RESOURCES COMMITTEE
THURSDAY 23 JULY 2026

1. **Chairperson's Notices**

2. **Apologies for Absence**

3. **Minutes of the Last meeting** (Pages 5 - 122)

   To consider the Minutes of the Strategy and Resources Committee held on 11 June 2026 (copy enclosed).

4. **Disclosure of Interest**

   To disclose the existence and nature of any Disclosable Pecuniary Interests, Other Registrable interests and Non-Registrable Interests relating to items of business on the agenda having regard to paragraph 9 and Appendix B of the Code of Conduct for Members.

   (Members are reminded that they are also required to disclose any such interests as soon as they become aware should the need arise throughout the meeting).

5. **Public Participation**

   To receive the views of members of the public, of which prior notification in writing has been received (no later than noon on the Tuesday prior to the day of the meeting).

   Should you wish to submit a question please complete the online form at: www.maldon.gov.uk/publicparticipation.

6. **Anti-Corruption Policy Suite** (Pages 123 - 182)

   To consider the report of the Director of Finance (copy enclosed).

7. **Friary Fields Property Acquisition** (Pages 183 - 188)

   To consider the report of the Director of Place, Planning and Growth, (copy enclosed, APPENDIX 1 to follow).

8. **SUEZ Depot Expansion Project** (Pages 189 - 208)

   To consider the report of the Director of Neighbourhood Services and Communities (copy enclosed).

9. **Treasury Management Outturn** (Pages 209 - 232)

   To consider the report of the Director of Finance (copy enclosed).

10. **Any other items of business that the Chairperson of the Committee decides are urgent**

NOTICES

Recording of Meeting
Please note that the Council will be recording and publishing on the Council's website any part of this meeting held in open session.

Fire
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MINUTES of
STRATEGY AND RESOURCES COMMITTEE
11 JUNE 2026

PRESENT

Chairperson	Councillor A Fittock
Vice-Chairperson	Councillor M G Bassenger
Councillors	J R Burrell-Cook, J Driver, M F L Durham, A S Fluker, K M H Lagan, S J N Morgan, U G C Siddall-Norman, P L Spenceley and N D Spenceley (Substitute for S Dodsley)

1. CHAIRPERSON'S NOTICES

The Chairperson welcomed everyone to the meeting and went through some general housekeeping arrangements for the meeting.

2. APOLOGIES FOR ABSENCE AND SUBSTITUTION NOTICE

An apology for absence was received from Councillor S Dodsley. In accordance with notice duly given, it was noted that Councillor N D Spenceley was attending as a substitute for Councillor Dodsley.

3. MINUTES OF THE LAST MEETING

RESOLVED that the Minutes of the meeting of the Committee held on 19 March 2026 be approved and confirmed.

4. DISCLOSURE OF INTEREST

There were none.

5. PUBLIC PARTICIPATION

No requests had been received.

6. ESSEX COAST RECREATIONAL DISTURBANCE AVOIDANCE MITIGATION STRATEGY REVIEW

The Committee considered the report of the Director of Place, Planning and Growth providing an update on the review of the Essex Coast Recreational disturbance Avoidance Mitigation Strategy (RAMS) and seeking Members' approval of the final Strategy (attached as Appendix 1 to the report). Members were also asked to consider revoking the existing Supplementary Planning Document (SPD) and replacing it with an updated Technical Advice Note.

It was noted that Natural England had requested the review to ensure the RAMS and its evidence base remained up to date. The updated RAMS included an enhanced mitigation package and a revised tariff reflecting increased housing growth and the need for mitigation to be secured in perpetuity.

Members noted that the tariff would rise from £175.55 to £500 per new dwelling, inclusive of a 5% administration fee, and that the existing RAMS SPD was no longer aligned with the updated strategy. In its place a Technical Advice Note (TAN) would be prepared to guide implementation and delegation to the Director of Place, Planning and Growth was sought to finalise and publish the TAN.

The Committee also noted the extensive mitigation work already undertaken in the Maldon District by Bird Aware Essex, including over 1,442 hours of ranger activity and more than 4,454 public engagements. The updated RAMS retained a flat tariff across Essex, as alternative apportionment methods would have resulted in significantly higher charges for coastal authorities such as Maldon.

Following a detailed presentation of the report by the Planning Policy Manager, the Chairperson moved the recommendations as set out in the report, noting that they would be a recommendation to the Council. This was duly seconded.

A number of comments and questions were raised during the debate that ensued and in response further information was provided by the Planning Policy Manager, including:

- The proposed tariff cost of £500 per dwelling had been calculated taking a number of factors into consideration including the mitigation measures required for the predicted number of new houses in Essex over the 20-year period and then the lifetime of the development. Chelmsford City Council (CCC) was the accountable body and whilst all Essex authorities involved in RAMS collected and then transferred monies to CCC, the spending of monies was done in consultation with the Council mainly through the RAMS Steering Group which the Policy team attend. Members were advised that CCC also managed the Bird Aware branding and delivered the mitigation measures, engagement with Parish Councils, local communities, visitors etc.
- It was confirmed that the new dwelling tariff was a flat rate across any new houses in Essex. Houses within a closer proximity to the coastline paying a higher tariff had been discussed by the RAMS Steering Group but for consistency and ease of collection a flat rate tariff had been agreed. Members were advised that the District benefited as a high proportion of the mitigation measures happened along the Maldon coastline.
- £500 per new house appeared to be an average cost when compared to comparable tariffs nationally and was a figure calculated through a robust method accounting for predicted levels of housing growth and the lifetime of the development.
- As part of the Bird Aware work communications, talks, site visits etc. along the coastline had been taking place. Members were advised that Officers were happy to work with Bird Aware Essex and the RAMS Delivery Manager to engage with parish councillors or Members in respect of this work.

The Chairperson put the recommendations, and these were duly agreed.

RECOMMENDED

(i) that the revised and updated Essex Coast Recreational disturbance Avoidance Mitigation Strategy (RAMS) 2026 and tariff (attached at **APPENDIX 1** to these Minutes) be approved, superseding the current RAMS 2018-2038;

(ii) that the new RAMS tariff of £500 per new dwelling or qualifying unit (index linked and inclusive of a 5% admin fee) be applied to new development from 1 August 2026;

Note: the current fee is £175.55 and benchmarks as low compared to tariffs nationally, while the new fee is mid-range, The new fee includes increased expectations of eligible housing units, and is considered not just for the implementation period, but also for the maintenance period.

(iii) that the adopted Essex Coast RAMS Supplementary Planning Document (SPD) be revoked, noting that its content is no longer aligned with the updated RAMS;

(iv) that Members agree in principle to replace the Essex Coast RAMS SPD with an Essex Coast RAMS Technical Advice Note (TAN), recognising that this will provide a consistent mechanism to guide decision-making for local authorities within the RAMS partnership area;

(v) that authority be delegated to the Director of Place, Planning and Growth, in consultation with Planning Policy Working Group to agree and publish the TAN once drafting is complete.

7. REPLACEMENT OF PAY AND DISPLAY PARKING MACHINES

The Committee considered the report of the Director of Neighbourhood Services and Communities seeking Members' approval to replace the Council's existing pay-and-display parking machines.

The Director of Neighbourhood Services and Communities presented the report advising that the Council's existing pay-and-display machines were no longer sustainable due to age, obsolescence and rising maintenance issues, creating risks to service continuity, customer experience and the Council's £2m annual parking income. It was reported that a replacement programme would provide a modern, reliable and cost-effective solution that aligned with current customer behaviour, with the capital purchase option offering the best long-term value. Evidence showed that customers had already shifted significantly towards cashless payments, meaning the current machines were under-used; therefore, rationalising the number of machines would better match demand, increase income per machine, reduce maintenance costs and do so without materially affecting accessibility.

The Chairperson moved the recommendations set out in the report and this was duly seconded.

In response to questions raised the Director of Neighbourhood Services and Communities advised that the option to pay by cash had been removed from all Council car parks a number of years ago and Officers were not looking to reverse that decision. Pay as you exit would be considered as part of this proposal and the new machines would have functionality to accommodate this should the Council wish to introduce that payment method. In respect of a barrier for exit only, Officers advised that a review of all car parks would be required to ascertain whether this was practical or not.

Councillor J R Burrell-Cook referred to the loss of income from being cashless and proposed that recommendation (i) be amended to include pay on exit as an option. This amendment was duly seconded.

The Director of Finance reminded Members of the discussions that had taken place at the Finance Working Group when considering these proposals. Officers highlighted the need to ensure that the income stream of £2 million was safeguarded along with issues regarding reliability with the current machines.

During the debate that followed, a number of Members commented on the proposal as set out in the report and alternative solutions including the use of Automatic Number Plate Recognition (ANPR) systems and pay as you leave were raised. In response the Senior Car Park and Community Safey Officer provided further information on the options considered and the ongoing need for enforcement officers due to the Council having to issue physical penalty notices.

In response to a question regarding the proposed removal of the car parking machine at the Promenade Park Coach Park, Members were advised that this decision had been made as there had been an unreliable service from the machine and a large proportion of payments were made using the RingGo cashless payment system. It was clarified that parking was free for those users who had a disabled parking permit.

The Chairperson then moved the proposed amendment to recommendation (i) in the name of Councillor Burrell-Cook. Upon a vote being taken this was not agreed. He then put the recommendations set out in the report and upon a vote being taken these were agreed.

RESOLVED

(i) that the replacement of the existing pay and display machines with fit for purpose, modern and updated alternatives be approved;

(ii) that the rationalisation of machine provision from twenty-one (21) to twelve (12), informed by current usage data and reflecting the increasing uptake of parking app payments be approved;

(iii) that the machines are procured via capital purchase (not leased) as the most cost-effective option and that capital funding to the value of £100,000 is approved;

(iv) that the transition toward contactless and, where appropriate, ticketless parking operations be endorsed;

(v) that the intention to align parking systems with wider Mid Essex arrangements be noted.

8. CULTURE AND HERITAGE STRATEGY

The Committee considered the report of the Director of Strategy and Improvement seeking Members' approval to create a Culture and Heritage Strategy (the Strategy) for the Maldon District drawing on information set out in Appendix 1 to the report.

The Director of Strategy and Improvement presented the report and took Members through the extensive engagement, partnership working and evidence gathering which had led to formation of the Strategy. The Strategy would provide a clear and practical framework for protecting and strengthening the district's distinctive cultural, heritage and environmental assets whilst supporting community wellbeing, regenerative tourism and economic resilience. It was noted that the detailed themes had been grouped into five strategic areas which provided a clear overview of where future focus, partnership working and investment would be needed.

If the Committee approved the Strategy a costed Action Plan would be developed to deliver against the Strategy, with external funding to be sought where possible (e.g. Arts Council England, Public Health and Heritage funding). The Action Plan would be presented to the relevant Committee for approval later in the year, proposed for September 2026.

At this point Councillor J R Burrell-Cook declared an interest as Chairperson of Maldon District Tourism Group and worked with Cultural England.

The Chairperson moved the recommendations set out in the report. These were duly seconded.

In response to some comments further information was provided by the Director of Strategy and Improvement, and it was noted that the Council's Corporate Plan stated that the Council would develop a Culture and Heritage Strategy.

The Chairperson put the recommendations to the Committee and upon a vote being taken these were duly agreed.

RESOLVED

(i) That a Culture and Heritage Strategy for the Maldon District be approved, informed from the briefing papers at Appendix 1 to the report;

(ii) that Members acknowledge work will now commence to develop a costed Action Plan to be brought back to the relevant Committee later this calendar year, proposed to be September 2026.

9. PAY POLICY STATEMENT 2026 / 27

The Committee considered the report of the Director of Strategy and Improvement seeking Members' consideration of a Pay Policy Statement (PPS), attached at Appendix 1 to the report.

The Director of Strategy and Improvement introduced the report, advising that in order to meet requirements of the Localism Act 2011 the Council had to publish and annually approve a PPS. A number of changes had been made to the current PPS and these included:

- clarification that payments relating to the administration of elections were outside of current pay policy arrangements.
- removal of Pay Bands A and B in line with the National Joint Council (NJC) 2025 / 26 pay award, and it was noted that any employees aligned to these bands had been transitioned to Pay Band C.
- market supplements had been updated to reflect their increase in line with national agreed pay awards.

- an increase to the Council's pay ratio to 1:4:4.

Members were advised that the NJC Pay Award had yet to be agreed nationally and once agreed the PPS would be updated and staff provided backpay to 1 April 2026, as required. However, it was noted that since publication of the report the Chief Officers pay award to up lift pay by 3.5% had been agreed.

The Chairperson moved the recommendations set out in the report. These were duly seconded and agreed.

RESOLVED

(i) That the Committee notes:

a) the inclusion confirming that payments relating to election duties fall outside the Council's standard pay policy arrangements, reflecting their statutory and distinct nature;

b) the removal of Pay Bands A and B, as required under the National Joint Council (NJC) Pay Award 2025/26, and the consequential transition of affected employees to Grade C with effect from 01 April 2026/27;

c) that Market Supplements will increase in line with nationally agreed pay awards, ensuring consistency and transparency in pay management arrangements;

RECOMMENDED

(ii) that the 2026 / 27 Pay Policy Statement attached at **APPENDIX 2** to these Minutes be approved.

10. BUDGET MONITORING REPORT - PERIOD 12 (31 MARCH 2026)

The Committee considered the report of the Director of Finance providing the final (outturn) financial position for the period year to 31 March 2026 (period 12).

The Director of Finance thanked budget managers for their work and presented the report which provided an update on a number of areas including the following:

- **Revenue Budget Outturn (Period 12)** - The outturn for this budget was an underspend of £133,000 attributable to additional income from investments, car parks and planning activities and further detail was set out in Appendix 1 to the report. Salary underspend had been used to fund interim and temporary staff costs and the overspend in Finance Services was due to prior years' corporate savings being included in these budgets.

- **Significant Changes During the Year** - A number of key developments had been undertaken during the year which included the Local Government Reorganisation proposals, the first year of the new Leisure Services Contract and restructure of staff. The report provided further detail in respect of each key development.

  The Director of Finance advised that the pension strain total figure shown at paragraph 5.4.10 of the report was incorrect and should be £531,000. This was noted.

- **Activity Levels** – The report included a number of charts which provided background information on some of the high-profile areas of activity and therefore key drivers of overall cost.
- **Capital Budget Monitoring - Outturn** – The main project details were set out in Appendix 2 to the report, and the report provided a list of those capital schemes completed during this period.
- **Reserves** – Appendix 3 to the report detailed the movements on Earmarked Reserves for 2025 / 26.
- **General Fund Debtors** – Outstanding debt for general fund activities as at 31 March was £383,811 and detailed in the report along with the work undertaken to collect debts. Details of general debt written off by the Council to the end of March 2026 was set out in the report.
- **Collection Fund** – A table within the report set out the collection fund outturn position and it was noted that a strong collection rate (985) and stable debt position indicated good management of the fund. The Director of Finance highlighted the work being undertaken by the Revenues and Benefits Team, alongside the Finance Team.

It was noted that in line with previous monitoring reports the outturn showed good performance in both revenue budgets and capital investment in line with expectation; debts had reduced, and reserves applied in line with previous decisions.

The Chairperson moved the recommendations as set out in the report. This was duly seconded.

In response to questions raised, the Director of Finance provided the following information:

- The debt written off and as set out in paragraph 7.5.4, related to general debt and therefore excluded the Collection Fund and Non-Domestic Rates, which were addressed separately. The bad debt provision exceeded £1million, and the reduction in the overall level of outstanding debt meant that the bad debt provision could be reduced, which was where the benefit detailed in the report had arisen from.

  In response to a question regarding comparison with the last three years, the Director of Finance advised he did not have that information to hand but would provide it. He emphasised that Council's reduction in overall debt, achieved through collection rather than write-off, was more significant.
- The Director of Finance clarified that figure 4 this the year-on-year comparison of staff full-time equivalents as at April 2025 and April 2026. He noted that the number of posts at Director level had reduced, with the largest increase occurring in pay grades F – H. In relation to redundancy, he advised that new structures had been considered and the Council had sought to limit the impact on individuals, based on the advice it had received.

The Chairperson put the recommendations set out in the report and upon a vote being taken these were duly agreed.

RESOLVED that the Committee:

(iii) notes that the forecast revenue expenditure outturn as at 31 December 2025 is £20k over budget against the net service budget of £14.114m; also that the improved income position in a number of areas means that use of general reserves can be avoided. Further information can be found at section 3 and Appendix 1 to the report along with reasons for significant variances.

(iv) notes the forecast capital expenditure outturn as at 31 December 2025 which is for a total capital programme delivery of £5.654m against revised budget of £6.980m, and the details of schemes completed in the year so far (paragraph 3.3.4 to the report). Further information can be found at Appendix 2 to the report along with reasons for significant variances.

(v) approves the movements in Earmarked Reserves set out in Appendix 3 to the report;

(vi) notes the revenue budget reconciliation between the opening and current budget in Appendix 4 to the report.

11. APPOINTMENT OF REPRESENTATIVES ON OUTSIDE BODIES AND WORKING GROUPS

The Committee considered the report of the Chief Executive to appoint to Outside Bodies and Working Groups of the Strategy and Resources Committee for the ensuing municipal year.

The Chairperson called for nominations to the Outside Bodies and Working Groups detailed.

Following a brief discussion and receipt of nominations the following was agreed.

RESOLVED

(i) That the Committee appoints representatives to the Outside Bodies as listed below, for the ensuing Municipal Year;

Outside Body	**2025 / 26 Representatives**
Maldon Citizens Advice Bureau Liaison	Councillors M F L Durham, S J N Morgan and P L Spenceley
Maldon Museum in the Park Liaison Committee	Councillors J R Burrell-Cook and K M H Lagan

(ii) That the Committee appoints representatives to the Working Group as listed below, for the ensuing Municipal Year;

Working Groups	**2025 / 26 Representatives**
Car Park Fees Annual Review Group	Councillors M G Bassenger, J R Burrell-Cook, J Driver and M F L Durham *Plus Leader and Deputy Leader of the Council's as the Council's representatives on the South Essex Parking Partnership*
Waste Contract Member Working Group	Councillors J R Burrell-Cook, J Driver, M F L Durham, A S Fluker, K M H Lagan and S J N Morgan

There being no other items of business the Chairperson closed the meeting at 9.09 pm.

A FITTOCK
CHAIRPERSON

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FOOTPRINT ECOLOGY

Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS)

Durwyn Liley, Emily Rush & Phil Saunders

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Footprint Ecology is a small, employee-owned, ecological consultancy with an ethical focus. Founded in 2004 and based in Purbeck, Dorset we are catalysts for change, collaborating with organisations that share our commitment to sustainability and social responsibility. We create practical solutions to complex ecological challenges across a diverse portfolio including nature conservation, outdoor recreation and associated strategic planning.

Footprint Contract Reference: 837
Date: 24th April 2026
Version: Final
Recommended Citation: Liley, D., Rush, E., & Saunders, P. (2026). Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). Report by Footprint Ecology.

Summary

This avoidance and mitigation strategy ('the RAMS') sets out the mitigation requirements relating to impacts from recreation and the cumulative effects of new housing and tourism development on the Essex coastline. The strategy covers the internationally important nature conservation sites along the Essex coast, from the Stour Estuary to the Thames Estuary. This section of coast is protected through a range of designations (including Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar listing) that afford strict legal protection. The RAMS ensures the relevant local authorities meet legislative requirements and adequately protect these European sites when permitting development. It enables housing growth while ensuring the exceptional importance of the Essex coast for biodiversity is not undermined.

Residential development brings additional people to live in the area and an increased demand for recreation. In addition, increases in the number of tourists and visitors from further afield adds to the people visiting the coast. Access to the countryside is important to many, it brings economic and health benefits to society and is a legal right yet can be difficult to balance with nature conservation. High levels of recreation can result in impacts to the nature conservation interest for example through trampling damage, disturbance or increased fire risk.

This strategy replaces and updates the original strategy established in 2018. Just under 150,000 new dwellings are now planned within the established Zone of Influence within future plan periods (extending to around 2042).

Mitigation measures, set out in detail within the strategy, comprise SAMM (Strategic Access Management and Monitoring) and cover measures on and around the European sites. These measures are to address the in-combination effects of new development and include increased ranger time, signage, interpretation, screening and changes to parking. Monitoring is incorporated to help target the mitigation to the right locations. The level of mitigation is appropriate to the significant level of growth now anticipated and is secured in-perpetuity.

Off-site infrastructure and SANG ('Suitable Alternative Natural Greenspace') provide additional scope to mitigate the alone impacts of particular development and deflect visitors away from the European sites (for example providing locations that welcome dog walking). Detailed guidance on SANG is however outside the remit of this strategy.

The RAMS will be updated on a rolling basis approximately every 5 years, providing the opportunity to check the mitigation, scale of growth and update any costs. As such the strategy provides a long-term solution to impacts from recreation. By addressing risks up front, the strategy provides a proactive, cross-boundary solution that ensures cumulative impacts of growth across a wide area are taken into account. The strategy ensures necessary resources and costs are identified and provides clarity for developers when bringing forward sites for development within a defined Zone of Influence.

Contents

Maps

Acknowledgements

This strategy has been commissioned by Chelmsford City Council on behalf of a partnership primarily comprising Basildon Borough Council, Braintree District Council, Brentwood Borough Council, Castle Point Borough Council, Chelmsford City Council, Colchester City Council, Maldon District Council, Rochford District Council, Southend-on-Sea City Council, Tendring District Council, Thurrock Borough Council and Uttlesford District Council, alongside Essex County Council, Natural England, Essex Wildlife Trust, and the RSPB. We are grateful to Leanne Brisland for overseeing the commission.
Cover photo © Goldhanger Creek by Footprint Ecology.

1. Introduction

1.1 This strategy sets out the mitigation requirements relating to the impacts from increased recreation (linked to the in-combination effects of housing growth and tourist development across the county) on important nature conservation sites on the Essex coast. It replaces a previous strategy and relates to the 12 relevant Local Planning Authorities (LPAs) that comprise the greater part of the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) Partnership[1]. The RAMS ensures these authorities are adequately protecting the relevant wildlife sites from the impacts of recreation, while mitigating the impacts of new housing in a timely manner. The strategy also provides clarity for developers when bringing forward sites for development within a defined Zone of Influence.

1.2 The Essex coast is of exceptional nature conservation importance, with a suite of sites along the coast that are covered by international designations, which afford strict protection for the biodiversity and habitats present. These sites ('European sites') stretch between the Stour Estuary in the north and the Thames Estuary in the south.

1.3 New housing growth in the various towns and villages near the coast, and tourism development in the area, has the potential to result in more people visiting the designated coastal sites. Increasing recreation use brings particular risks - this strategy addresses those risks, ensuring LPAs meet legislative requirements when permitting relevant development. By addressing risks up front, the strategy provides a proactive, cross-boundary, solution that ensures cumulative impacts of growth are taken into account and that the necessary resources and costs are identified.

1.4 A strategic and plan led approach to protecting sites from the cumulative impact of additional recreation is now widely recognised as being more effective than dealing with such impacts on a development-by-development basis. A strategic approach has been in place for the Essex coast since 2018 and similar approaches have been established around the country (for

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[1] The 12 Local Planning Authorities that make up the majority of the Essex Coast RAMS Partnership include Basildon Borough Council, Braintree District Council, Brentwood Borough Council, Castle Point Borough Council, Chelmsford City Council, Colchester City Council, Maldon District Council, Rochford District Council, Southend-on-Sea City Council, Tendring District Council, Thurrock Borough Council, and Uttlesford District Council. The partnership also includes Essex County Council, Natural England, Essex Wildlife Trust, and the RSPB.

example on the Suffolk Coast, the Dorset Heaths, the Thames Basin Heaths and the Solent).

1.5 Recreation pressure is complex, as the way visitors use a site can change with time and the distribution of the qualifying features can also change. Furthermore, to ensure effectiveness, mitigation needs to include a package of measures that work in an integrated way. For example, educating visitors, reinforcing messages with site-based staff, and providing the right infrastructure to meet visitor needs and influence visitor behaviour could all fit together as part of a mitigation package, but cannot be delivered in a piecemeal way, if implemented by individual developments on a case-by-case basis.

1.6 Collective funding is essential for on-site measures, and these can then in turn be supported by the provision of the right alternative green infrastructure, i.e. a positive step to create more space for recreation and make a meaningful reduction in visits to the European sites. A strategic approach also ensures that mitigation can be secured in a way to maximise benefits for local communities and wildlife, ensuring a positive approach that provides for recreation use and ensures long-term protection for the European sites.

1.7 The original strategic mitigation scheme (which this replaces) was developed in partnership by the relevant LPAs, with input from a number of other organisations (for more information see Place Services / Essex County Council, 2018).

1.8 The strategy established a Zone of Influence (i.e. the zone within which it is deemed that mitigation measures are required) and a series of mitigation measures that work together to provide robust protection for the various European sites. Mitigation measures have been funded by developer contributions. The mitigation included Strategic Access Management and Monitoring measures (‘SAMM’), that were targeted towards the European sites and included measures such as rangers.

1.9 This RAMS document replaces and updates the previous strategy. It has been produced following visitor surveys and a structured programme of workshops and formal meetings involving a wide range of stakeholders. The update is necessary to provide continued protection for the relevant European sites, to account for changing recreational use of the European sites and to ensure the strategy is appropriate to the level of growth coming forward in the respective Local Plans, with mitigation secured in-perpetuity for the duration of the impact.

2. Background and wider context

2.1 This section sets out the background to the relevant legislation and provides wider context in terms of countryside access, nature recovery and changes to planning and local government that may be relevant.

Legislative context

2.2 This strategy has been produced in order to meet particular legislative requirements. European sites are those afforded the highest level of legislative protection for biodiversity. Public bodies, including LPAs, have specific duties in terms of avoiding deterioration of habitats and species for which sites are designated or classified, and stringent tests have to be met before plans and projects can be permitted. Importantly, the combined effects of individual plans or projects must be taken into account. For LPAs, this means that the combined effect of individual development proposals must be assessed collectively for their cumulative impact.

2.3 The designation, protection and restoration of European sites is embedded in the Conservation of Habitats and Species Regulations 2017, as amended, which are commonly referred to as the 'Habitats Regulations'. They include Special Protection Areas (SPAs) classified under the 1979 Birds Directive and Special Areas of Conservation (SACs) designated under the 1992 Habitats Directive. Collectively, these sites are sometimes referred to as Habitats sites. Ramsar sites were afforded the same level of statutory protection in England through the Planning and Infrastructure Act (2025). In this strategy we use the term 'European site' to refer to SACs, SPAs and Ramsar sites.

2.4 European sites are the cornerstone of UK nature conservation policy. They form part of a 'national network' of sites that are afforded the highest degree of protection in domestic policy and law. Public bodies are referred to as 'competent authorities' within the legislation. The duties set out within the Habitats Regulations, in relation to the consideration of plans and projects, are applicable in situations where the competent authority is undertaking or implementing a plan or project, or authorising others to do so.

2.5 The legislation is founded on the 'precautionary principle' and it is necessary to rule out harm, rather than demonstrate impacts. Assessment (Habitats Regulations Assessment) requires consideration of effects either alone or in-combination, and this strategy therefore relates to the cumulative effects of plan-led development across the relevant local planning authority areas.

2.6 The strategy is therefore necessary to allow the LPAs, as competent authorities under the Habitats Regulations, to rule out adverse effects on integrity for relevant European sites, as a result of recreation linked to future housing growth. The strategy is therefore focussed on future risk and being able to have the necessary certainty, under the Habitats Regulations, that harm can be ruled out and impacts not exacerbated by further development.

Planning and Infrastructure Act

2.7 The UK government has set ambitious targets for house building over the current parliament. The Planning and Infrastructure Act (2025) aims to speed up and streamline the delivery of new homes, with a focus on strategic mitigation to enable development. The Act includes provision for a delivery body (Natural England) to be responsible for the production of Environmental Delivery Plans (EDPs), determining standardised levels of environmental mitigation needed for certain types and scales of development in a specific area. Where an EDP exists, developers will have the option to pay into a new 'Nature Restoration Fund', which the delivery body will use to fund appropriate mitigations, including by pooling contributions from multiple developers. It is proposed that contributions to the Nature Restoration Fund will mean that Habitats Regulations Assessments (HRAs) will not need to assess the implications of a particular development in respect to the particular impact pathway the EDP is addressing. The first EDPs will cover issues such as nutrient neutrality but it is possible that they may cover impacts from recreation in certain areas at some point in the future.

2.8 It is important to ensure mechanisms are in place for strategic mitigation to be delivered in the absence of any alternative. As such this RAMS is intended to run as long as necessary to ensure continued mitigation and compliance with the relevant legislation. Regular reviews will be undertaken to ensure the strategy remains aligned with any legislative changes or new regulatory requirements.

Additional context

The importance of access to the countryside and the new England Coast Path

2.9 It is now increasingly recognised that access to the countryside is crucial to the long-term success of nature conservation projects, for example through enforcing pro-environmental behaviours and instilling a greater respect for the world around us (Richardson et al., 2016). Access also brings wider benefits to society that include benefits to mental/physical health (Bragg and Atkins, 2016; Kondo et al., 2020; Lee and Maheswaran, 2011) and economic benefits (Bateman et al., 2014; Dasgupta, 2021; Day, 2020). In recent years there have been shifts in government policy and debate around enhancing access to the countryside.

2.10 Changes include the King Charles III England Coast Path, which will create a continuous walking route around the England Coast. The Marine and Coastal Access Act (2009) provides for the establishment of the England Coast Path and, usually, the right of accesses over the associated coastal margin. The right of Coastal Access includes 'roll back' such that if a section of coast erodes, the path will move back accordingly.

2.11 The King Charles III England Coast Path is being rolled out in sections, with sections 32-40 covering the Essex coast. Some sections are fully open while other sections are approved (or partly approved) but not yet open, with establishment works planned or in progress. The path will ensure a clearly marked National Trail running along the coast and around the estuaries. While it is not for this strategy to provide mitigation for the Coast Path, it is important to understand its context as the path may influence how people access and use different areas of the coast.

Nature Recovery and the LNRS

2.12 Local Nature Recovery Strategies (LNRS) support the establishment of a national Nature Recovery Network (NRN) and aim to identify opportunities and priorities for nature restoration at a local level. Essex's LNRS[2] highlights recreation as a pressure for many habitats and areas. The LNRS also maps areas of particular importance for biodiversity and sets out the priority species and habitats. The LNRS provides context to the RAMS in highlighting the wider importance and role of land outside European sites and collaborative working to facilitate nature recovery.

[2] See https://www.essex.gov.uk/about-council/plans-and-strategies/environment-and-planning/local-nature-recovery-strategy

Devolution

2.13 Greater Essex are part of the Government's Devolution Priority Programme. This involves the establishment of a Mayoral Combined County Authority (MCCA) for the local government areas of Essex County Council, Southend-on-Sea City Council and Thurrock Council. This proposed body would operate above the existing county, unitary, city, district and borough councils across Greater Essex.

2.14 In parallel, the Government is progressing Local Government Reform, which focuses on reshaping the structure of local authorities. Under current proposals, all 15 councils in Essex (including the county council, Southend and Thurrock) would be replaced by 5 unitary authorities.

2.15 In late March 2026, Government confirmed that they are 'minded to' approve a model of five new unitary authorities for Essex to replace the existing local authorities as well as Essex County Council.

2.16 As part of the behind-the-scenes work to align services, systems and ways of working, in preparation for the new unitary authorities coming into existence on 1 April 2028, consideration will need to be given to the future oversight, governance and coordination arrangements of RAMS.

3. Relevant European Sites

3.1 The European sites covered by the strategy are shown in Map 1, with their qualifying features listed in Table 1. This selection is the same as the previous strategy and it can be seen there is one SAC (the Essex Coast SAC), 9 SPAs and 9 Ramsar sites. The SPA and Ramsar sites are similar and the boundaries largely identical, so for simplicity only the SPAs are shown in Map 1. Hamford Water is the one SPA where the boundary is markedly different from the Ramsar of the same name, with the SPA extending to cover a wider area to the east.

3.2 It should be noted that the Stour and Orwell Estuaries SPA/Ramsar sites lies to the north of the area and the Thames Estuary and Marshes SPA/Ramsar to the south and for both these European sites there are areas outside Essex that are not included in the strategy and not shown in Map 1. For the Stour and Orwell Estuaries, the Orwell component and the northern shore of the Stour lies within Suffolk and is covered by the Suffolk RAMS. For the Thames Estuary only the Mucking Flats (near Tilbury) component of the SPA/Ramsar is included. The rest of the SPA/Ramsar lies on the north Kent shore and is covered by Birdwise Kent and a similar mitigation scheme.

3.3 While Map 1 shows the designated site boundaries and Table 1 lists the particular features for each site, it is important to note that many of the qualifying features of the sites will move between sites. Birds may move from one estuary to another and as such the Essex coast potentially functions more as a single unit rather than multiple separate sites. Furthermore there will be areas outside the site boundaries that play a supporting role and will be functionally-linked (see Chapman and Tyldesley, 2016 for definitions and further background). The strategy encompasses such functionally linked land in that the birds using those areas could still be vulnerable to disturbance and mitigation measures may be relevant. These considerations are relevant for both breeding (e.g. Little Tern taking advantage of new areas of shingle) and wintering (e.g. use of fields and grazing marsh by wildfowl and waders).

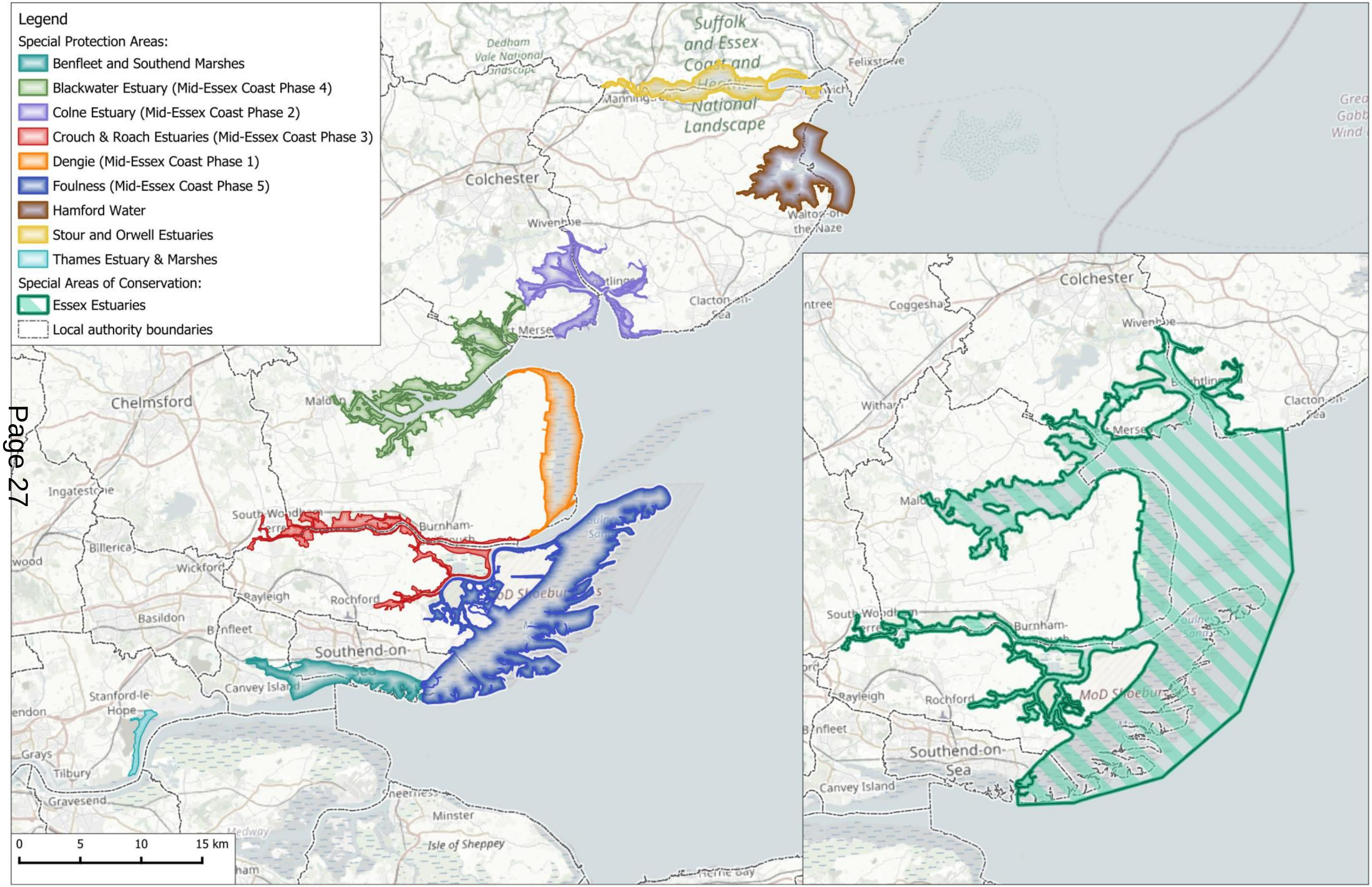
3.4 It is also important to note that there are European sites in the area that are not covered by the RAMS. These include Hamford Water SAC, which qualifies solely for its population of Fisher's Estuarine Moth. This SAC is excluded from further consideration as the moth population (and the Hog's Fennel foodplant upon which it relies) is mostly restricted to islands within Hamford

Water (i.e. within areas largely inaccessible to recreation activity). In line with the previous version of the strategy, Abberton Reservoir SPA/Ramsar and Epping Forest SAC are also excluded.

3.5 Map 2 shows the combined area of the European sites in context with the 12 local planning authorities that collect RAMS contributions and intersect the Zone of Influence.

Map 1: European sites covered by the RAMS. Main map shows SPAs, and inset map (same scale) shows SACs

APPENDIX 1



Map 2: The 12 local authorities within the the RAMS

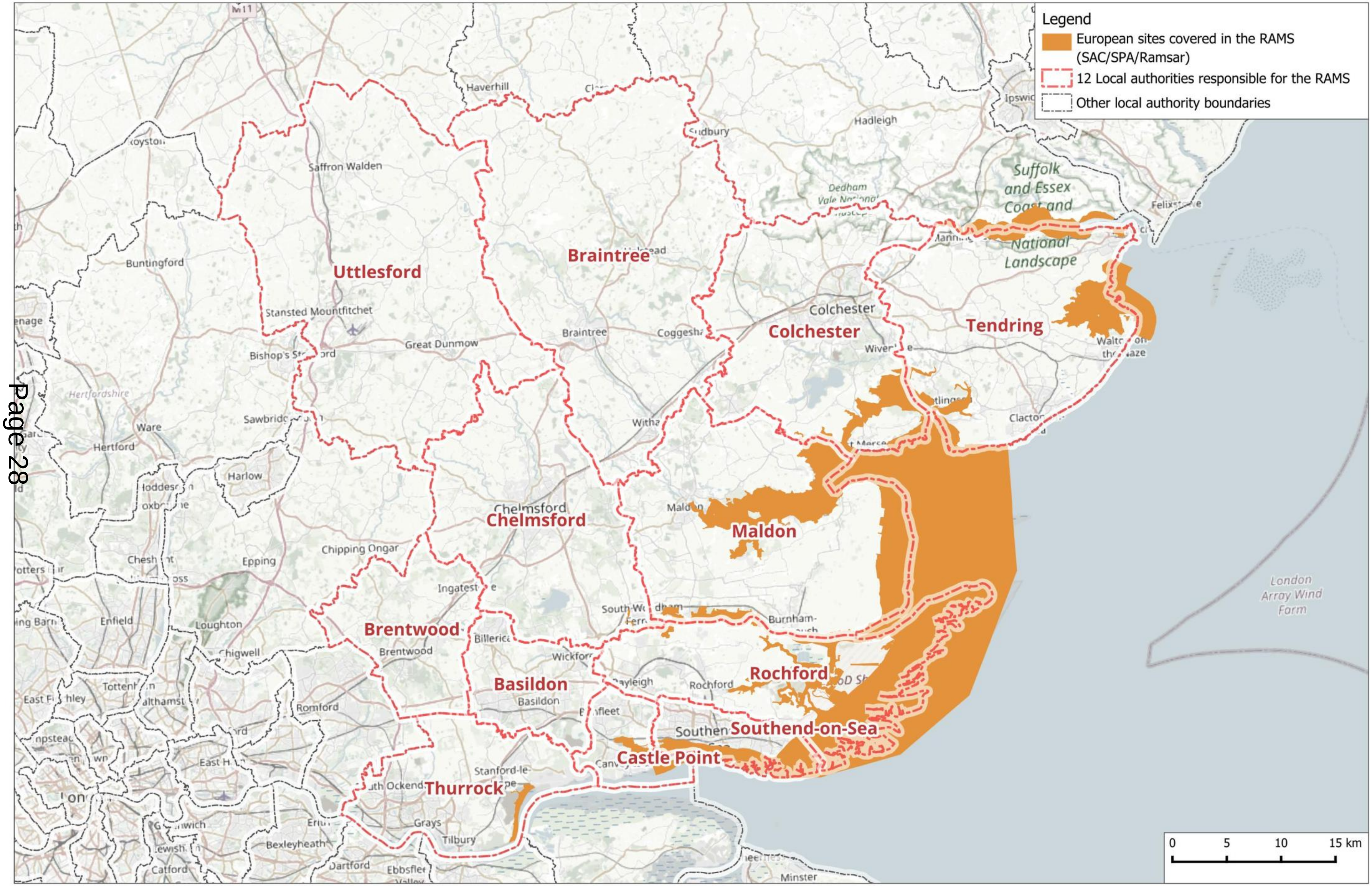


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Table 1: European sites and qualifying features. Links cross-reference to the Natural England designated site page, which provides further background and the relevant conservation objectives, etc. For the waterbird assemblage underscoring refers to non-breeding only, and 'P' refers to passage only for other species.

European site	Habitats						Assemblages			Non-breeding birds														Breeding birds					
	Sandbanks which are slightly covered by sea water all the time	Mudflats and sandflats not covered by seawater at low tide	Salicornia and other annuals colonising mud and sand	Spartina swards	Atlantic salt meadows/saltmarsh	Mediterranean and thermo-Atlantic halophilous scrubs	Waterbird	Wetland invertebrate	Wetland plant	Avocet	Bar-tailed Godwit	Black-tailed Godwit	Dunlin	Grey Plover	Knot	Oystercatcher	Redshank	Ringed Plover	Dark-bellied Brent Goose	Pintail	Shelduck	Teal	Hen Harrier	Avocet	Ringed Plover	Pochard	Common Tern	Little Tern	Sandwich Tern
Essex Estuaries SAC	✓	✓	✓	✓	✓	✓																							
Hamford Water SPA										✓		✓		✓			✓	✓	✓		✓	✓						✓	
Hamford Water Ramsar												✓					✓	✓	✓										
Stour and Orwell Estuaries SPA							✓					✓	✓	✓	✓		✓		✓	✓				✓					
Stour and Orwell Estuaries Ramsar							$\underline{\checkmark}$	✓	✓			✓	✓	✓	✓		✓		✓	✓									
Colne Estuary SPA							✓										✓		✓				✓		✓	✓		✓	
Colne Estuary Ramsar					✓		$\underline{\checkmark}$	✓	✓								✓		✓										
Blackwater Estuary SPA							✓					✓	✓	✓					✓				✓		✓	✓		✓	
Blackwater Estuary Ramsar					✓		$\underline{\checkmark}$	✓	✓			✓	✓	✓					✓										
Dengie SPA							$\underline{\checkmark}$							✓	✓				✓				✓						
Dengie Ramsar					✓		$\underline{\checkmark}$	✓	✓					✓	✓				✓										
Crouch and Roach Estuaries SPA							$\underline{\checkmark}$												✓										

European site	Habitats						Assemblages			Non-breeding birds														Breeding birds					
	Sandbanks which are slightly covered by sea water all the time	Mudflats and sandflats not covered by seawater at low tide	Salicornia and other annuals colonising mud and sand	Spartina swards	Atlantic salt meadows/saltmarsh	Mediterranean and thermo-Atlantic halophilous scrubs	Waterbird	Wetland invertebrate	Wetland plant	Avocet	Bar-tailed Godwit	Black-tailed Godwit	Dunlin	Grey Plover	Knot	Oystercatcher	Redshank	Ringed Plover	Dark-bellied Brent Goose	Pintail	Shelduck	Teal	Hen Harrier	Avocet	Ringed Plover	Pochard	Common Tern	Little Tern	Sandwich Tern
Crouch and Roach Estuaries Ramsar							✓	✓	✓										✓										
Foulness SPA							✓				✓			✓	✓	✓	✓		✓				✓	✓	✓		✓	✓	✓
Foulness Ramsar					✓		✓	✓	✓		✓			✓	✓	✓	✓		✓										
Benfleet and Southend Marshes SPA							✓						✓	✓	✓			✓	✓										
Benfleet and Southend Marshes Ramsar							✓							✓	✓				✓										
Thames Estuary and Marshes SPA							✓			✓		✓	✓	✓	✓		✓	✓					✓						
Thames Estuary and Marshes Ramsar							✓	✓	✓			✓	✓	✓	✓		✓	P											

Recreational use

3.6 Work commissioned by Natural England to inform the England coast path route and HRA work (Panter and Liley, 2016) noted the presence of at least 210 car parks within 1 km of the European sites relevant to the RAMS; these providing around 18,000 parking spaces. They also recorded nearly 2,000km of paths within the same area and mapped 143 jetties, 146 slipways and 40 marinas on the relevant shorelines. As such there are numerous opportunities across a wide area for recreational access.

3.7 Visitor surveys (Rush et al., 2025) commissioned alongside this strategy[3] involved surveys at 26 locations and 1,793 interviews were conducted with visitors. Most interviewees (93%) were visiting directly from home, however 7% were staying away from home, either on holiday (4% of all interviewees) or staying with friends and family in the area (3%).

3.8 The survey results show the main activities to the Essex Coast to be dog walking (45% of interviewees) or walking (35%). Visits were typically relatively short (averaging around 102 minutes in the summer and 75 minutes in the winter) and on average interviewees visited 2.3 times per week.

3.9 Close to home was the most common reason for choosing to visit the coast, reflected by the median distance (home postcode to interview location) of just under 5km. The survey results also highlighted the impacts of local facilities on visitor behaviour. In total, 16% of interviewees gave visiting a café, restaurant or pub as one of the activities they had undertaken (or planned to undertake) on the day interviewed. 4% of interviewees indicated that the presence of a café, restaurant or pub was the specific reason behind the choice of where to visit on the day they were interviewed.

3.10 The average route length was 3km although this differed between activities undertaken on site.

3.11 The results suggest that the Essex Coast was busy all year round, with 60% of interviewees indicating that they tended to visit all year round. For those survey points that were surveyed in both the summer and winter period, there were more people counted during the winter than the summer.

[3] Report available to download on the Footprint Ecology website

3.12 Benfleet and Southend Marshes appeared both the busiest and had the most local cohort of visitors, compared to the Crouch and Roach (quietest) and the Dengie and Hamford Water which each had a wider draw for visitors.

Impacts of recreation

3.13 Drawing from the general literature (Harris, 2023; Liley et al., 2010; e.g. Lowen et al., 2008; Marion et al., 2016), impacts associated with recreation to coastal sites include:

- Damage (trampling and wear);
- Contamination;
- Increased fire risk;
- Disturbance to breeding birds;
- Disturbance to wintering birds;
- Difficulties with land management; and,
- Damage to infrastructure, etc.

3.14 These are considered in turn below. It should also be noted that nutrient enrichment from dog fouling can also pose a particular issue (De Frenne et al., 2022) that is most relevant to low nutrient habitats. In coastal areas such habitats would comprise vegetated shingle or unimproved grassland. These habitats are largely absent from the area covered by the RAMS however, and do not comprise qualifying features of the relevant European Sites; this impact pathway is therefore considered no further.

Damage (trampling and wear)

3.15 Trampling damage relates to footfall and ground pressure from wheels (bikes, buggies etc.). Erosion and wear are also linked to boat use, including the scouring from the bottom of boats as well as the wake from fast moving boats and damage linked to anchors/moorings.

3.16 Mechanical damage to plant tissue causes a loss of vegetation cover, changes in the plant composition of the vegetation and loss of species and a reduction in plant height. Trampling can cause damage to root systems and increase water run-off, soil erosion and compaction with consequences for decomposition, nutrient cycling and water quality. Compaction can also cause a reduction in organic matter, affecting fertility and the water infiltration capacity of the soil. Compaction can also impact on mycorrhizal fungi, affecting plant uptake of nutrients from the soil. Other effects of human trampling include the widening of paths and path erosion, particularly on slopes.

3.17 Particularly sensitive habitats include seagrass beds, saltmarsh (including those dominated by Spartina), Atlantic salt meadow, and halophilous scrub. There may also be knock-on consequences for species – not only birds but also habitat specialist invertebrate species. Species such as the wolf spider *Arctosa fulvolineata*, the striped Horsefly, Big-spotted Cleg, and Ground Lackey moth are reliant upon upper saltmarsh habitats where footfall is most likely.

3.18 Seagrass beds are present within the European sites and recreation is identified as a threat[4]. Saltmarsh and halophilous scrub are also widely distributed within the RAMS area, however given the difficulty in accessing some areas, damage is considered likely to be localised within proximity to urban areas and access infrastructure such as car parks.

3.19 While trampling is not highlighted as a major concern in the Site Improvement Plans (SIPs) for any of the European Sites under discussion, visual appraisal of aerial imagery nevertheless shows that (localised) evidence of such damage is readily apparent (see Figure 1).

[4] See https://www.essexwt.org.uk/what-we-do/protecting-wildlife/projects/seagrass for background.

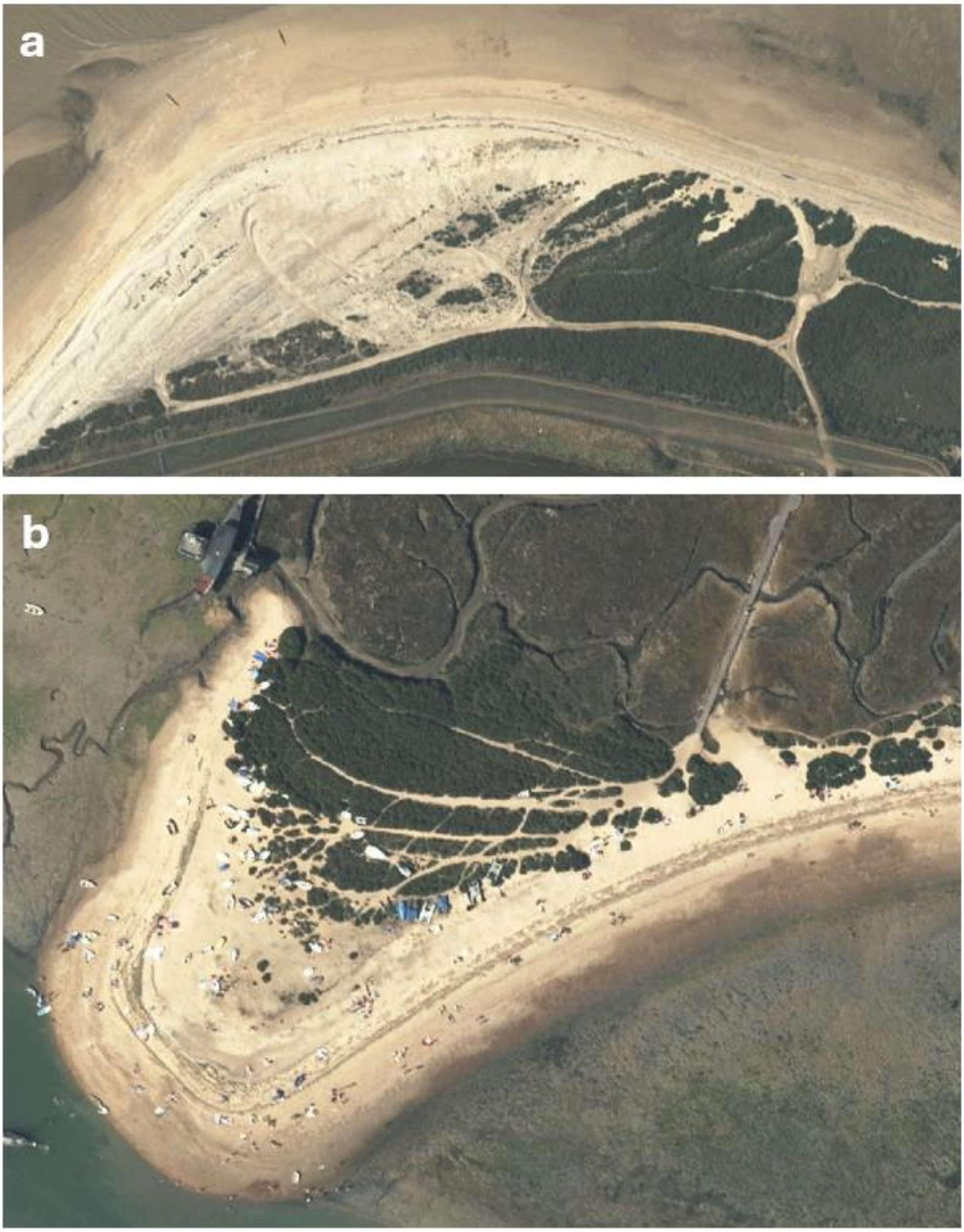


Figure 1: Aerial images depicting examples of trampling damage/wear in areas of halophilous shrub and bordering saltmarsh at: (a) Bradwell-on-Sea (within the Essex Coast SAC/Dengie Ramsar); and (b) West Mersea (within the Essex Coast SAC/Blackwater Estuary Ramsar). Images © National Coastal Monitoring https://coastalmonitoring.org/.

Contamination

3.20 Ponds and small water bodies are often popular with dogs and dog walkers will often seek such features out, particularly in hot weather. Heavy use by dogs leads to turbid water, an impoverished invertebrate flora and a loss of vegetation (Denton and Groome, 2017; Groome et al., 2018).

3.21 Shampoos, wormer, tick and flea treatments are a further concern (Groome et al., 2018; Harris, 2023). There is growing evidence of contamination by pesticides including flea treatments such as fipronil and imidacloprid in watercourses (Perkins et al., 2024, 2021, 2020). Preliminary studies of waterbodies at four locations in the New Forest where dogs are known to regularly enter the water revealed the presence of imidacloprid and at one site levels were nearly double the internationally agreed toxicity threshold for aquatic invertebrates[5]. Testing of waterbodies in sand dune systems in the Sefton Coast area has found similar levels of contamination (Denning et al., 2024).

3.22 Dogs may also act as vectors for non-native invasive plant species, such as New Zealand Pygmyweed *Crassula helmsii* (Groome et al., 2018) and the trampling impacts around the edge of the waterbody may lead to a loss of surrounding vegetation, exacerbating impacts.

3.23 These issues are potentially relevant to aquatic, wetland and coastal habitats (such as ditches and borrow dykes) and the specialist plant and invertebrate species that they support. Such species include the Scarce Emerald Damselfly, which is found across several of the European Sites.

3.24 Contamination is also potentially relevant in terms of litter. While discarded rubbish, waste etc. is unsightly it may not always be directly damaging to the qualifying features. However, discarded fishing line can entangle birds, food waste may encourage predators (such as foxes, gulls etc) and certain products such as plastics are a widespread and recognised concern (Sutherland et al., 2012; Wilcox et al., 2015).

[5] Reported by the BBC: https://www.bbc.co.uk/news/uk-england-hampshire-68400630

Increased fire risk

3.25 Fire incidence is directly associated with recreation use (Anderson, 1986; Miller and Miles, 1984; Tantram et al., 1999) for example through discarded cigarettes, sparks from a campfire, barbeques and even deliberate arson.

3.26 Fires can have major impacts on the soil, vegetation and fauna present, and recovery can take many years. Fire can change water filtration within soils and result in loss of nutrients (Mallik et al., 1984). Burning can also cause erosion through the exposure of soils – charred peat surfaces are particularly vulnerable (e.g. Maltby et al., 1990). Vegetation recovery may depend on the intensity of the fire and whether litter (protecting rootstock. and seeds) is burnt (Alchin, 1997).

3.27 Climate strongly influences wildfire risk and climate change is likely to increase the risks of wildfire and the types of habitat affected (Jolly et al., 2015). The incidence of forest fires globally has doubled since 1984 as a result of global warming (Mansoor et al., 2022). It is likely that wildfire incidence will occur in situations and vegetation communities where it has previously been rare or very limited (anon, 2017) and increasingly site managers will have to take active measures to minimise risks on sites.

3.28 While fire risk is therefore perhaps low for many of the habitats within the sites covered by the RAMS, this may well change. Most at risk will be upper saltmarsh and reedbed areas, particularly where these are relatively dry. A large fire on the Dee Estuary in 2022 destroyed reedbed habitat within the SPA there, and while outside the area covered by the RAMS, highlights that coastal areas can still be vulnerable.

Disturbance to birds

3.29 Disturbance occurs where human activity influences an animal's behaviour or survival. By far the majority of the literature (and there are thousands of studies), focuses on birds (Brawn et al., 2001; Hill et al., 1997; for a general review see Hockin et al., 1992; Lowen et al., 2008; Showler, 2010; Steven et al., 2011; Whitfield et al., 2008). Disturbance can also affect mammals, herptiles (see Edgar, 2002 for a review), and invertebrates.

3.30 Disturbance can have a range of different impacts, potentially affecting distribution, breeding success and health. Impacts can be chronic, for example otherwise suitable nesting habitat being completely avoided (e.g. Liley & Sutherland, 2007) or more short-term in nature, for example birds becoming alert and then resuming the initial activity (Fernandez-Juricic et al., 2001).

3.31 Impacts can also include direct mortality of birds. There are studies showing increased predation rates when birds are disturbed, for example predators taking advantage of the change in behaviour caused by the disturbance (e.g. Brambilla et al., 2004). There are also examples of pet dogs preying on birds, for example both Ringed Plover adults and chicks have been witnessed predated by dogs (Liley et al., 2021; Pienkowski, 1984). Some studies document direct trampling of nests/eggs of ground-nesting species, where the eggs are so well camouflaged people are unaware of the damage they cause (Liley and Sutherland, 2007).

3.32 These impacts from disturbance can result from a wide range of activities. For example Steven *et al.* (2011), in their review of disturbance impacts to birds, listed the following activities and research findings:

- Standing/observing: 15 studies, 14 showing negative effects of disturbance;
- Touring/walking/hiking: 51 studies, 45 showing negative effects of disturbance;
- Running: 6 studies, 6 showing negative effects of disturbance
- Cycling/Mountain bike riding: 3 studies, 3 showing negative effects of disturbance;
- Canoeing: 3 studies, 3 showing negative effects of disturbance; and
- Dog walking: 11 studies, 11 showing negative effects of disturbance.

3.33 It is of course often difficult to separate different types of activities as at many sites multiple activities tend to overlap in space and time and impacts may be cumulative. Nonetheless, dog walking is widely recognised as a particular threat (Bavin et al., 2025; Harris, 2023) that has a disproportionate effect compared to other activities (Banks and Bryant, 2007; Cavalli et al., 2016; Gómez-Serrano, 2021; Lafferty, 2002; Taylor et al., 2007). Dogs are likely to be perceived as a greater threat, will actively chase birds and are able to access areas such as intertidal habitats that people on foot may avoid.

Breeding bird interest

3.34 Breeding birds are vulnerable to disturbance, with good evidence from the UK for a range of relevant species. For example disturbance has been shown to affect population size for Ringed Plover (Liley and Sutherland, 2007) and there are a range of studies showing disturbance effects for Little Tern (Medeiros et al., 2007; Ratcliffe et al., 2008; Rowell, 2020; Tratalos et al., 2021). Disturbance can lead to areas of suitable habitat being avoided entirely. In areas where they do nest, breeding birds are tied to a specific nest location, and there are particular energetic costs associated with egg laying, incubating, and raising chicks which can be exacerbated by disturbance.

3.35 The issues for breeding birds vary. Ringed Plover tend to nest on shingle and gravelly areas close to suitable intertidal foraging habitat. They are also territorial, meaning that territories/nests can be distributed along the beach. Terns are typically colonial nesters, with a more clumped distribution. Little Terns tend to nest in smaller, scattered, colonies spread across a range of beaches – typically the same sandy, open beaches favoured by people visiting the coast for recreation (D. Liley et al., 2023). The single remaining colony on the Essex Coast is at Hamford Water.

3.36 Sandwich Terns, by contrast, tend to nest in a smaller number of much larger, colonies. These colonies are susceptible to individual disturbance events, with the disturbance implicated in the abandonment of multiple colonies around the UK coastline (Brown and Grice, 2005; Tavener, 1965). The species' propensity to nest in a very small number of large colonies, and the potential for rapid abandonment makes it particularly vulnerable to human disturbance (Bourne and Smith, 1974; Garthe and Flore, 2007).

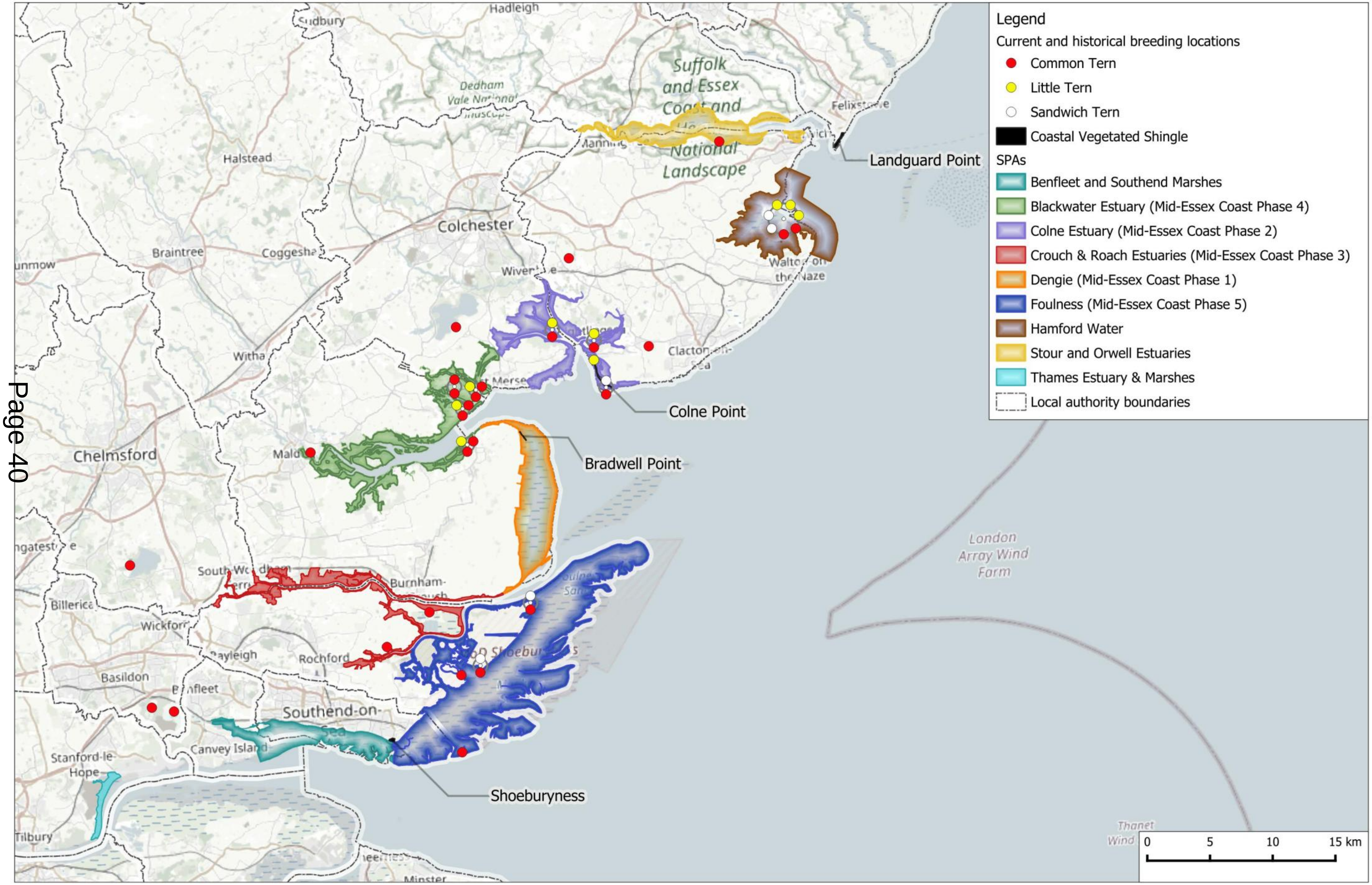
3.37 Common Terns will also nest colonially, with colony size varying across locations. The species will breed coastal shingle, beaches, saltmarsh, and offshore islands making it susceptible to coastal recreation (Brown and Grice, 2005), as well as inland lakes, reservoirs, and gravel pits.

3.38 Avocets breed colonially on a range of shallow, coastal, wetlands, including saltmarshes and saline/brackish lagoons (Brown and Grice, 2005). The majority of saline/brackish lagoons that are used are those created within reserves such as Wallasea Island where protective measures (such as fences) are in place and therefore disturbance is potentially less of a concern. Saltmarsh areas are perhaps more at risk from disturbance for example from dogs off lead or paddleboarders/kayaks accessing from the water. Such disturbance could also potentially affect other breeding waders that use saltmarsh, such as Redshank. Pochard generally breed on a range of sheltered/undisturbed inland waters, surrounded by dense vegetation, although they will also utilise brackish areas on the coast. As a breeding species they are potentially less susceptible to disturbance than the other breeding bird species.

3.39 Map 3 depicts records of breeding terns/tern colonies within Essex since 2000, alongside expanses of coastal vegetated shingle. The latter is shown as a proxy for additional/potential future breeding locations for Ringed Plover and Little Tern in particular. The bird data comes from a range of sources previously synthesised by Panter & Liley (2016), including the Essex Bird Report and Natural England, as well as more recent information from the Seabird Monitoring Programme[6].

[6] https://app.bto.org/seabirds/public/data.jsp

Map 3: Historical (post-2000) and current breeding locations for a selection of the SPA-qualifying bird species, shown alongside relevant European site and local authority boundaries. Areas of coastal vegetated shingle are labelled and shown as a proxy for potential/future Little Tern and Ringed Plover breeding locations. Note that overlapping points are displaced around a central point to aid interpretation



Non-breeding bird interest

3.40 The various estuaries and wetland habitats along the Essex Coast support very large numbers of non-breeding bird species, including waders and wildfowl. The relevant SPAs are classified for a range of species individually and also the wintering waterbird assemblage, reflecting the wide range of species and large numbers of birds that can be present around the whole coastline.

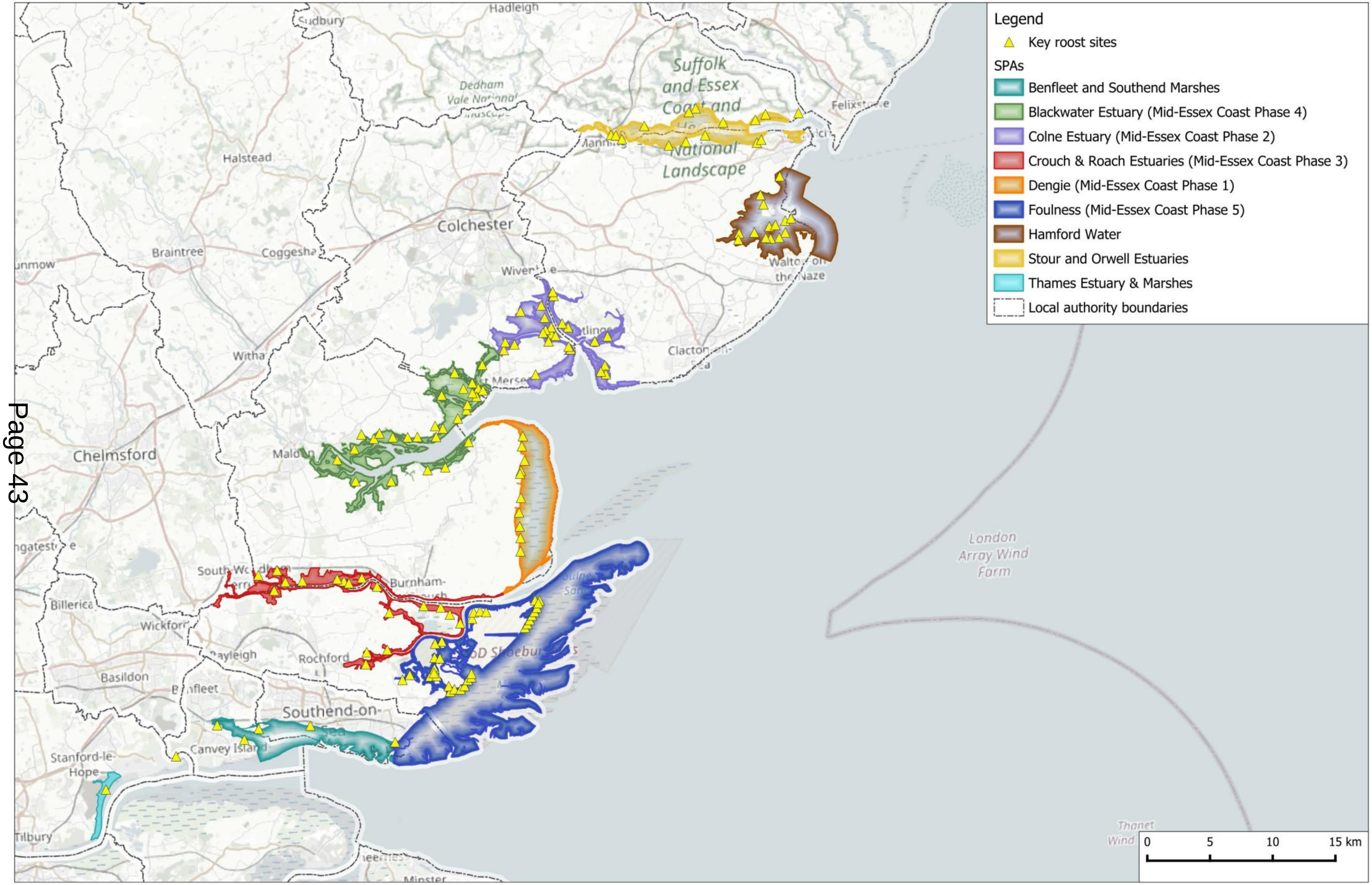
3.41 While overall numbers tend to peak during the winter, the coast is important for these non-breeding species for much of the year, with non-breeding birds present from July through to May. Different species will use different areas at different times of year and numbers fluctuate, and multiple populations from different breeding sites can be involved. For example, the local breeding Ringed Plovers are likely to move to southern areas of the UK and France and be replaced by birds from the Baltic and Scotland over the winter. In May, Ringed Plovers from more northern populations, even as far north as Greenland and Canada may pass through on passage.

3.42 Disturbance for these wintering waterbirds can lead to areas of habitat being avoided (van der Kolk et al., 2022) and there can be energetic costs as a result of repeated flushing, which can be particularly damaging when food supplies or environmental conditions change (Goss-Custard et al., 2006).

3.43 Bird disturbance studies on the Orwell and Stour (Ravenscroft et al., 2008) over three winters found the Orwell to be much busier than the Stour, but birds tended to respond more to the presence of people on the Stour, potentially because the Stour held larger numbers of birds and there were more alternative areas available for the birds to switch to. Shoreline activities caused most disturbance at high tide while those occurring in the estuary caused the most disturbance at low tide. The authors suggested disturbance was having an impact on the populations of birds on the Stour and Orwell Estuaries SPA.

3.44 All intertidal mudflat habitat, when exposed, has the potential to be used by the non-breeding bird interest. Exposure will vary with the tidal cycle. In addition, birds will often gather over high tide and roost sites may support large numbers of birds at a given time. Use of roosts will vary according to prevailing weather conditions, habitat etc. and roosts can be avoided as a result of disturbance (Peters and Otis, 2007; van der Kolk et al., 2022). Map 4 overlays the relevant SPA boundaries with the locations of key wader and waterbird roost sites, as identified in Panter & Liley (2016), with additional information synthesised from the previous Essex RAMS and informed by the RSPB (Place Services / Essex County Council, 2018). These data are not comprehensive but provide an indication of the distribution of roosts and highlight how roost sites are present within all the SPA sites.

Map 4: Key non-breeding wader and waterbird roost sites alongside the relevant European site and local authority boundaries **APPENDIX 1**



Difficulties with land management

3.45 High recreational use can lead to challenges for land managers, with staff time and resources directed towards litter collection, emptying bins, managing parking and dealing with any problems (such as lost pets, gates left open etc.). Furthermore, high levels of recreation use can potentially lead to demand for facilities and infrastructure, creating additional pressure for those managing sites. Local residents can also be a strong voice in opposition to any change, potentially meaning additional consultation and community dialogue required prior to any changes or high-profile interventions.

3.46 Dog attacks on livestock have led to challenges with grazing some sites. Essex Wildlife Trust have stopped grazing sheep at some locations due to dog attacks. Where grazing and dog walking co-exist there is often a need for greater staff presence, extra secure fencing and very clear messaging to visitors with dogs.

Overview and additional context

3.47 The impacts caused by recreational activities are varied, and some impact pathways are more relevant to some features than others. As such, the risks for each European site on the Essex coast are slightly different. Based on the qualifying features for each site and other information available, we summarise which impact pathways are potentially relevant to each European site in Table 2. We have not tried to assign a degree of risk or ranked issues for different sites; a tick in the table simply indicates the potential for risk.

3.48 While we have summarised the risks separately, they also interact, for example a saltmarsh fire would reduce the available habitat for birds, with the potential to exacerbate risks of disturbance. In addition, many of the features are quite mobile and change in distribution over time, this is particularly the case with species such as Little Tern.

Additional context

3.49 Climate change will impact the distribution of the qualifying features, exacerbate risks such as fire incidence, change recreation patterns and fundamentally change the coast and surrounding habitats. Rising sea levels, coastal squeeze and more storm surges lead to a loss of habitat such as saltmarsh than mean there is less space for both recreation and for wildlife.

3.50 Recreation use will shift over time in response to trends, social media and a range of social factors and as such there is some complexity and inevitable uncertainty around the scale of future risk.

3.51 Dog ownership increased markedly during Covid (Morgan et al., 2020). Wild swimming (Bates and Moles, 2022), paddleboarding (Baker et al., 2021), drones (Rebolo-Ifrán et al., 2019) and e-bikes (Rérat, 2021) are becoming increasingly popular while improvements in wetsuit materials and technology can allow people to spend more time in the water, leading to changes in participation in activities such as kite surfing, jet skis, windsurfing and swimming. Tourism trends are also changing, with for example an increase in campervans, mobile homes and short-trip vacations to countryside destinations (e.g. Sommer, 2020). Campervans also provide opportunities for life-style choices with some people choosing to live 'off-grid'.

3.52 Such changes in the types of activity and how recreation takes place may mean people access sites in novel ways, for example paddleboards can be launched anywhere and are easily portable, meaning access to the water may not be focussed around slipways. Changing patterns of access may mean people access the coast at different times of day or different weather conditions, further exacerbating the existing level of recreational disturbance.

Table 2: Summary of risks to the relevant European sites from recreation.

European site	Damage (trampling and wear)	Contamination	Increased fire risk	Disturbance to breeding birds	Disturbance to non-breeding waterbirds	Difficulties with land management	Notes and reasons for ticks where further information necessary
Essex Estuaries SAC	✓		✓			✓	Habitats such as saltmarsh, seagrass and halophilous scrub potentially vulnerable to damage and increased fire risk
Hamford Water SPA				✓	✓	✓	
Hamford Water Ramsar					✓	✓	
Stour and Orwell Estuaries SPA				✓	✓	✓	Breeding Avocet an SPA feature and the supplementary conservation advice indicates Avocet have bred at Cattawade (as well as Trimley on the Orwell)
Stour and Orwell Estuaries Ramsar	✓				✓	✓	Ramsar listing includes a range of saltmarsh plants and eelgrasses potentially vulnerable to trampling
Colne Estuary SPA				✓	✓	✓	
Colne Estuary Ramsar	✓	✓	✓		✓	✓	Wetland invertebrate and plant interest potentially vulnerable to damage, contamination and increased fire risk
Blackwater Estuary SPA				✓	✓	✓	
Blackwater Estuary Ramsar	✓	✓	✓		✓	✓	Wetland invertebrate and plant interest potentially vulnerable to damage, contamination and increased fire risk
Dengie SPA					✓	✓	
Dengie Ramsar	✓	✓	✓		✓	✓	Wetland invertebrate and plant interest potentially vulnerable to damage, contamination and increased fire risk
Crouch and Roach Estuaries SPA					✓	✓	

European site	Damage (trampling and wear)	Contamination	Increased fire risk	Disturbance to breeding birds	Disturbance to non-breeding waterbirds	Difficulties with land management	Notes and reasons for ticks where further information necessary
Crouch and Roach Estuaries Ramsar	✓	✓	✓		✓	✓	Wetland invertebrate and plant interest potentially vulnerable to damage, contamination and increased fire risk
Foulness SPA				✓	✓	✓	
Foulness Ramsar	✓	✓	✓		✓	✓	
Benfleet and Southend Marshes SPA					✓	✓	
Benfleet and Southend Marshes Ramsar					✓	✓	
Thames Estuary and Marshes SPA					✓	✓	
Thames Estuary and Marshes Ramsar	✓	✓	✓		✓	✓	Wetland invertebrate and plant interest potentially vulnerable to damage, contamination and increased fire risk

4. SAMM ('Strategic Access Management and Monitoring')

4.1 SAMM measures form the basis of all strategic mitigation schemes (see Beveridge et al., 2024 for overview). SAMM comprise measures aimed at behaviour change or encouraging responsible access and are targeted at or around the European sites. Measures include signage, interpretation, ranger provision etc and extend to include monitoring linked to mitigation delivery to ensure the mitigation is targeted appropriately.

Mitigation delivery to date

4.2 Developer contributions have been used to fund the mitigation work set out in the original strategy (Place Services / Essex County Council, 2018), which at the time was designed to address impacts from 72,907 dwellings that (at the time) were anticipated to come forward in the period to 2038. The mitigation measures included:

- Recruitment of a full-time Delivery Manager (appointed in 2021) with role to oversee delivery and liaise with stakeholders;
- Adoption of the "Bird Aware" brand originally developed by Bird Aware Solent[7];
- Recruitment of a team of rangers to work on the ground to reduce disturbance by influencing the behaviour of visitors (team size of 4 full-time posts in 2024/25, including a lead ranger)
- Ranger attendance at a variety of prominent local events, raising awareness of Bird Aware Essex Coast and it's guidance;
- Development of initiatives to encourage responsible dog walking and encourage dog owners to go to less sensitive parts of the coast;
- Dedicated Bird Aware Essex Coast website[8] and social media channels, with content around responsible recreation, the ranger team, events, and general awareness raising;
- Production of an informative Bird Aware Essex Coast leaflet, about the habitats and the birds of the coast, that has been distributed widely throughout Essex;
- Habitat based measures, such as interpretation, fencing, waymarking, screening, access and habitat improvement; and,

[7] https://birdaware.org/solent/
[8] https://birdaware.org/essex/

- Institution of a monitoring scheme to track the implementation of mitigation measures and to assess their effectiveness.

4.3 The ranger team has grown over time and coverage across the area is not uniform, with effort targeted by the Bird Aware team. The team has identified at least 85 sites across the coast that require some sort of ranger presence and the level of provision at each is varied according to the ease with which it is possible to intercept and engage with visitors, presence of vulnerable features in areas that people might access, levels of recreation use and then effort is further refined according to tide, weather etc.

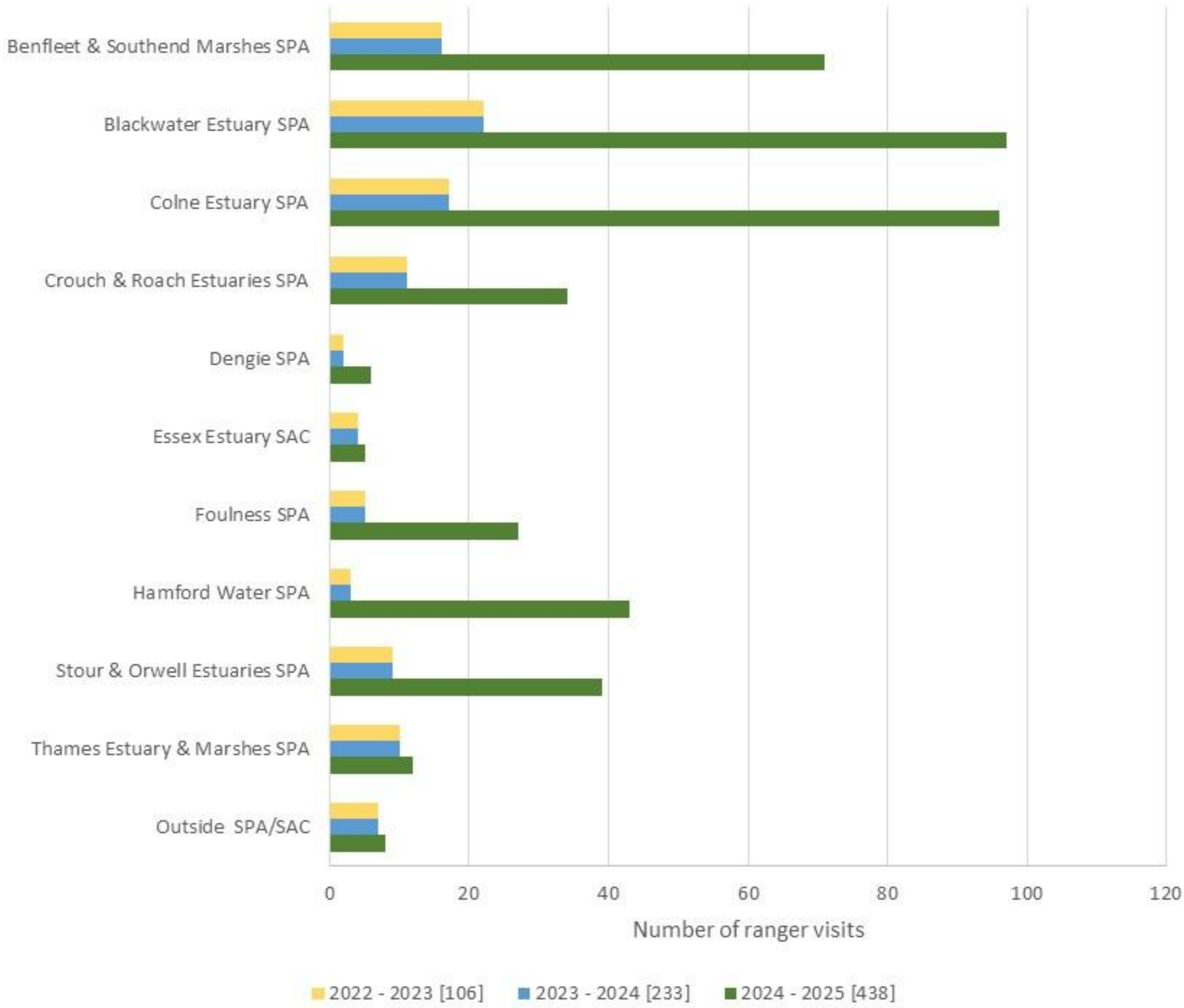


Figure 2: Ranger visits by year and European site. Data extracted from schedule provided by Bird Aware Essex team (note 24/25 data is the number of planned visits rather than actual visits).

SAMM measures in this strategy

4.4 SAMM measures include education, engagement with recreational users to influence their behaviour, raising awareness about the Essex coast and it's biodiversity, access management and monitoring. The measures are focussed around the European sites and extend to cover functionally-linked land in the vicinity. Measures are summarised below and itemised in Table 3 (at the end of this section). The measures have been carefully considered to build on the existing mitigation work achieved to date and further increase the level of mitigation provision to ensure it is sufficient to address the level of housing growth now planned.

Measures relevant to all sites

4.5 The delivery manager will oversee the implementation of the mitigation, with their role having strategic oversight of the mitigation, including the delivery of the strategy and partnership governance. The role ensures the budget and finances are appropriately managed, setting out the financial responsibilities, monitoring financial contributions, financial forecasting, RAMS reserves and in-perpetuity funds etc as appropriate. The delivery manager will also oversee the reporting and provide the point of contact for planning officers, other local authority staff, conservation organisations and other stakeholders etc.

4.6 The ranger team is fundamental to the mitigation delivery. It is proposed to have two ranger teams, one covering sites from the northern side of Blackwater north to the Stour estuary and one covering from the southern side of the Blackwater south to the Thames Estuary. Each team will have 1 lead ranger and 3 coastal rangers. Both teams will be supported by up to 3 seasonal ranger roles which will be flexible on the sites they support based on whether there are beach nesting birds that require specific support during the breeding season, providing flexible ranger support in the winter and for weekend working, and complimented by the dog officer and education and engagement officer roles. The overall ranger team size is therefore 9.5 full-time equivalent (fte) posts (including team leaders and 3 seasonal posts, each of 6 months).

4.7 This will essentially provide the following coverage, although each team will have the flexibility to place ranger resource where it is needed:

- 1 ranger covering the Stour Estuary and Hamford Water – supported by 1 seasonal ranger.

- 1 ranger covering the Colne Estuary – supported by 1 seasonal ranger.
- 2 rangers covering the Blackwater Estuary – supported by 1 seasonal ranger.
- 1 ranger covering Dengie and Crouch and Roach Estuary.
- 1 ranger covering Foulness, Thames Estuary and Southend and Benfleet Marshes – supported by 1 or 2 seasonal rangers.
- 2 lead rangers, one for each team (i.e. 1 for Black-water – Stour and 1 for Blackwater – Thames).

4.8 This team size is necessary as in some locations/times there is a need for two rangers to be out together, due to health & safety concerns, effectiveness or for confidence building. The work is demanding and approaching strangers in relatively remote areas can be difficult; the larger team size ensures team morale and sufficient cover to ensure sickness, holidays etc will not compromise delivery. It may take some time for sufficient contributions to be collected to allow the team to reach this size and as the team builds it may be necessary for a different geographic breakdown.

4.9 The total length of coast covered by the ranger team is nearly 500km[9], giving around 53km per ranger (based team size of 9.5). This is a relatively large area for each staff member to cover and the physical difficulties in moving around the Essex Coast make this even more ambitious. The 500km estimate includes areas such as Foulness that are largely inaccessible to the public and some sections of shoreline are remote and seldom visited. Nonetheless, the extent of ranger coverage remains low or similar compared to other mitigation strategies. For example, the Severn Estuary has a level of provision of around 26km per ranger, the Solent (in 2022) around 36km per ranger and the Northumberland Coast around 37km per ranger (see Liley and Caals, 2024). A strategic review of mitigation provision on the Solent (D Liley et al., 2023) found rangers could speak to around 5-7 groups per hour on-site, depending on how busy the location was and the level of provision equated to around 30 minutes ranger time per new dwelling per winter. This was deemed low in the review.

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[9] this is an approximate figure, derived using the shoreline within SPA boundaries (including islands with land above mean high water mark) and defined as the edge of selected habitats. The measurement reflects the shoreline rather than including any portions at sea or open water. The figure was derived from GIS layers used in the work of Ross *et al.* (2014).

4.10 Alongside the ranger team and delivery manager, the strategy includes provision for four further posts:

- A dog project officer, full time to run dog walker engagement at particular locations and provide resources/engagement material for dog walkers, in-line with projects elsewhere in the country[10]. The role will complement the ranger teams by working as a specialist ranger as required;
- A communications officer (part-time) responsible for leading campaigns (e.g. dogs on leads) and work around specific activities and audiences (e.g. watersports), supporting the delivery manager and ranger team with social media, press releases etc and overseeing the website content.
- An education/community engagement lead (full time) undertaking work with schools, leading site visits/school trips.
- A monitoring and data lead, this being a part time role responsible for overseeing the data collected by the rangers, collating data from other sources (such as bird data) and producing regular reports.

4.11 Specific work areas for the various staff in the team and that apply across the whole geographic area will include:

- Maintain and update updating the Bird Aware Essex website and general information provision raising awareness of the coast, its importance for nature conservation and risks from recreation use.
- Undertake dedicated work on watersports and water-based recreation, raising issues of disturbance and trampling damage to sensitive habitat. Potential to produce generic guidance for whole coast as to where to launch, where to go, how to behave (including speed limits) and this supported on the ground/water with signs and buoys. This should include activities that are growing in popularity such as wild swimming, paddleboarding etc).
- Gather evidence on particular activities and events to provide information that could support/assist enforcement action if the need arises (enforcement by relevant authority/police etc).
- Contact holiday parks (with static caravans, lodges, mobile homes etc) and exploring opportunities for outreach, including interpretation, signage, information on slipways and other information for residents. Potential for an information pack or

[10] such as Dorset Dogs https://www.dorsetdogs.org.uk/, Devon Loves Dogs https://www.devonlovesdogs.co.uk/ and Coast & Country Canines https://coastandcountrycanines.org/

similar to be distributed to residents at key sites and dog-focussed projects.[11]

- Develop work around education resources and work with children to raise awareness of disturbance issues and the wildlife interest of the coast – including education packs, lesson plans and budget to fund children visiting sites.
- Complete the parking audit and use it to identify and prioritise locations where changes necessary (such as formalising parking, reducing parking spaces, need for height restriction barriers or other infrastructure) and inform dialogue/consultation with relevant parties over parking charges, car park design etc;
- Log bird use in nearby areas outside the boundary of European sites where disturbance issues may be relevant, for example fields adjacent to footpaths. This information will provide scope to target rangers or other mitigation to such areas as necessary.
- Undertake dedicated work around wildlife photography to promote best practice. Options could include supporting professional photographers or keen amateurs to act as ambassadors at popular locations, production of a code of conduct, social media and other publicity around the issues.
- Undertake some dedicated awareness raising and communications around drone use.
- Establish a jet ski working group with remit to develop joint working to manage growing issue and oversight of co-ordination/support for measures at a coast wide level.
- Clear messaging around where to walk dogs, sites where dogs are welcomed off lead and effective information and engagement coast wide around dogs. This will mean the dog project officer, rangers, communications officer and education work all highlight issues around dogs off-lead and responsible dog walking.
- Produce of a monitoring strategy (with budget for consultancy input) to ensure data officer has clear guidance and monitoring data are effectively integrated into mitigation delivery.
- Check the condition of relevant people counters and other monitoring equipment, replacing baterries and overseeing repair/replacement as required.
- Collect and review of monitoring data as relevant and to inform mitigation delivery.

[11] The visitor survey results indicated that those staying away from home accounted for a high proportion of visitors at certain locations. Data from other parts of the country indicate those the number of recreational visits made to European sites per unit of accommodation were as high or higher for holiday accommodation when compared to residential units (Panter and Liley, 2017)

- Link up with neighbouring mitigation strategies (Suffolk and North Kent) to ensure no gaps in coverage and consistency of approach where any overlap or work in close proximity. Scope for joint messaging and campaigns on some issues (e.g. around jet skis).
- Link up with other mitigation strategies and visitor management/engagement projects around the country to share best practice, expertise and learn from others.

Measures specific to particular locations

4.12 Alongside the coast-wide measures set out above, there will be a need for a range of site specific and more local projects. These will include (but are not limited to):

- Changes to individual car parks to make them work better, perhaps reducing parking provision in some places or creating new parking in more robust locations;
- Fencing or screening to keep people/dogs on paths;
- Path work to create new routes or improve paths to improve access while ensuring impacts reduced (e.g. creating routes that provide options for people to walk away from the shoreline);
- New/replacement signage;
- New/replacement interpretation;
- Changes to slipways and access points to the water to make them work better or restrict particular types of user (e.g. provision of barriers and gated access);
- Infrastructure to restrict or limit access by off-road vehicles and motorbikes where a persistent problem;
- Funding to support existing work and projects that have responsibilities for visitor management or engagement;
- Zoning or ways to redistribute access, for example creating areas where access is discouraged or not promoted or areas where particular activities are encouraged/promoted such as dedicated spaces for watersports;
- Buoys or other measures to inform those on the water when approaching sensitive locations;
- Support for site based staff/projects involved in managing access, particularly those with a focus on waterbased activities (e.g. around enforcement of speed restrictions on the water);
- Projects with marinas, holiday parks or other locations where high density of users and boat activity in particular locations;
- Projects to improve visitor facilities at sites – particularly those aimed at providing for local recreational use (e.g. dog walking, exercise) – where they can absorb more visitors without recreation

impacts. Examples could include litter bins, viewpoints, dog bins, dog washing stations, off-lead exercising facilities, etc.
- Roost protection measures;
- Breeding bird protection measures (fencing, signage etc).

4.13 Most of these kinds of projects will need to be undertaken by relevant landowners and site managers. Many will be relatively opportunistic in that they might depend on circumstance. For example, flooding or storm events may result in the need to replace infrastructure (fencing, paths etc) and this could provide scope to upgrade some elements. Changes in ownership or in staff may lead to different management options. Other funding sources may lead to new projects and drive change, creating opportunities for additional measures that have a mitigation benefit. One key driver for change will be the Beneficial Use of Dredged Sediments (BUDS) and also managed realignments which will create new areas of habitat that have potential to draw birds and people.

4.14 It is therefore not possible to define a complete list of local projects within this strategy that can be relied on as mitigation. Appendix 1 provides an overview of local project ideas and opportunities around the Essex coast. These are indicative ideas only that were generated during a series of workshops in September 2025, with locally based staff (from a range of organisations) working around the Essex coast, including Bird Aware Essex staff. The appendix is not exhaustive and some of the projects and ideas may not necessarily be feasible or work as mitigation.

4.15 As the ranger team spends time on the ground and the project builds momentum with partners, the project list can be refined and specific proposals developed. The strategy provides funding on an annual basis for locally based projects. This funding will provide the flexibility and scope to allow relevant stakeholders and organisations to be able to bid for funds for small scale projects that have a clear mitigation benefit and fit with the strategy. Equally it will be possible for the Bird Aware Essex team to work with local parties on the ground to assist in developing ideas and implementing work on the ground.

4.16 The governance and detail of any such funding to stakeholders would need to be set out and agreed by the RAMS Steering Group and Project Board to ensure funds are appropriately authorised. This will also ensure that the funding does provide mitigation benefit and ensure good geographic coverage. Strategic oversight will also ensure necessary monitoring is in place.

Evolution of SAMM and monitoring

4.17 The SAMM measures are able to shift and adapt with time, which is essential given likely changes at the sites, for example with respect to climate change. Ranger time can be focussed as appropriate and project funds can be directed to where they are needed through the locally-based projects. Engagement, for example through social media, provides further opportunity to reinforce messaging and influence behaviour in a targeted and dynamic way.

4.18 Monitoring will play an important role in supporting the strategy and mitigation delivery (ensuring mitigation is sufficient and keeping pace with housing growth). Data will be important to highlight changes in access, pick-up emerging trends and flag where new issues emerge. Mitigation delivery in terms of ranger time, levels of engagement and some ecological data will be important to inform future updates to the strategy. Some monitoring data will be useful to show how measures have worked, providing case studies and examples of successful interventions and best practice for others to adopt. Sharing these successes will be important to capacity building and the long-term success of the mitigation. Given the wide range of sites, range of issues and types of access, consistent and systematic data gathering will be a challenge. A monitoring strategy is therefore necessary (and costed within the SAMM measures) to ensure monitoring is integrated into mitigation delivery and the right data are collected to inform action on the ground.

4.19 Looking to the future, working with volunteers provides an opportunity to expand the work of the ranger team. Volunteers could act as ambassadors and potentially undertake tasks such as showing people birds, handing out information and so on. Some other bird disturbance mitigation projects involve extensive use of volunteers (e.g. Plovers in Peril on the Norfolk coast), where volunteers help with both engagement and with monitoring. By involving volunteers in monitoring there is the potential to raise understanding and appreciation of the bird interest among local people, which can then feed through into the engagement with other visitors.

4.20 There are also some clear risks to working with volunteers; influencing people's behaviour is difficult and the ranger team are carefully selected and receive considerable training. Any volunteer network would require considerable effort to build, maintain and support, with training, rotas, equipment, transport and similar – meaning a need for greater staff input (e.g. a volunteer coordinator) to make sure it works. There may be a need to vet volunteers to minimise risks of reputational damage. As such, the potential use and role of volunteers requires careful review, consideration and resourcing. Volunteers certainly do not provide a cheap panacea and alternative to dedicated rangers. As such it is best that the ranger team is the focus in the short term and the role of volunteers is reviewed, with the scope to incorporate them into the mitigation delivery in the medium term.

4.21 Close working with relevant stakeholders and other mitigation schemes around the country will also be important. This will ensure the Bird Aware Essex team are aware of local issues, familiar with best practice, aware of the latest research, able to learn from others and share information across organisations.

Table 3: Overview of SAMM measures

Mitigation measure	Description	Justification	Notes
Delivery Manager	Full time post managing ranger team and providing overall steer for mitigation delivery and link to partners, stakeholders, planners etc. Role also proving strategic links and wider policy work/liaison	Manager post key to ensuring smooth delivery and oversight of implementation	Already established and post extended to cover in-perpetuity
Ranger team leaders (2 posts)	Ranger team leader post with responsibility for co-ordinating team, oversight of rotas, ensuring cover for holidays, sickness etc., health & safety oversight, transport logistics etc. Two posts to allow for a northern team and southern team.	Rangers are a cornerstone of the mitigation. Leaders necessary to ensure coverage and co-ordinate work	Ranger team already established. Expansion necessary
Rangers (6 full-time, 3 seasonal)	Ranger team expanded and key function is patrolling on the European sites and directly engaging with visitors to those sites.	Rangers are a cornerstone of the mitigation.	Ranger team already established. Expansion necessary
Vehicles and other resources for rangers	Running costs for vehicle and any other travel costs, plus resources to cover equipment needed by team (trail cameras for nest monitoring, temporary signage etc.)	Budget required for transport and operational work. A dedicated vehicle has benefit in providing additional branding.	Bird Aware Essex branding necessary to ensure vehicle is eye-catching
Dog project staffing costs	1 post, fte	Staff costs to build project. Dog walkers main user group to influence and one with biggest impact	Post would be a dog specialist ranger post
Dog project resources	Running costs for events etc	Budget required for transport and operational work	
Communications Officer staffing costs	Mitigation relies on effective behaviour change through communication of key messages - focused, specialist work on	Budget required for operational work, targeted comms planning, campaigns,	

Mitigation measure	Description	Justification	Notes
	social media, press, newsletters. Running campaigns relating to wildlife photography, drones, watersports etc.	social media, newsletter and promotional/networking opportunities.	
Comms costs	Costs to cover resources for comms post in terms of campaign material, images, expenses etc	Comms work may need to buy in specialist design and support, for example graphics, images etc. Budget also covers campaign launches, printing and updates to the website	
Production of monitoring strategy & monitoring support	Consultancy support to work with the BA team and stakeholders to design monitoring programme and recording to cover data collection by ranger team, other relevant data (e.g. volunteer surveys), reporting protocols and report production	Will ensure monitoring is conducted efficiently and data available to feed into mitigation delivery	
Monitoring and data staffing costs	Budget for dedicated staff member to implement monitoring strategy, potentially covering targeted ecological monitoring, regular vehicle counts across area, automated counters, data collection by rangers while on site etc	Data important to help hone mitigation, target resources and pick up any changes/emerging trends	Will cover resources to collate data from a range of different sources, including surveys and automated counters.
Monitoring resources	Budget to cover commission of specific surveys where needed (e.g. vehicle counts) and purchase of equipment (automated visitor counters) etc. Dependent on monitoring straetgy	Data important to help hone mitigation, target resources and pick up any changes/emerging trends	
Visitor survey	Visitor survey to cover all European sites and surrounding GI (SANGs etc) at 5 year intervals	Provides data on changing use patterns, demographics, visitor numbers and visitor origins.	Repeat surveys of a selection of locations in line with work undertaken in 2024. Details to be set out in monitoring strategy

Mitigation measure	Description	Justification	Notes
Education/community engagement officer	Full-time post undertaking work with schools including schools visits and attending events	Education lead able to go into schools and community events (fetes etc), working directly with children in local communities to raise awareness with young people	
Resources for schools and events	Budget to cover resources for education work	Education/community engagement officer will need props and resources when visiting schools etc	
Engagement material for holiday parks etc.	Project targeting holiday parks, caravan sites etc with resources to develop material such as packs, leaflets, signage designs etc.	Wide range of holiday parks around coast, many providing cabins etc available for use all year round. Some with slip ways, boat storage etc.	Project could initially start by working with small group of sites to understand what might work. Potential for incentives such as help gaining environmental certifications or accreditation alongside promotion of wildlife around coast, responsible access etc.
Site-specific projects	Flexible funding for range of local and site specific projects	Workshops identified a wide range of possible projects that would have significant mitigation benefit but need to be subject to more detailed proposals and costings	Potential to create a small project fund to help deliver mitigation. Delivery manager and Bird Aware team would work with local partners to develop ideas and suggest opportunities

5. Off-site green infrastructure & SANG

5.1 Off-site green infrastructure and Suitable Alternative Natural Greenspaces (SANG) relate to additional greenspace, aimed at deflecting visitors away from the European sites (for example providing locations that welcome dog walking). These are widely used around the country to provide mitigation alongside SAMM measures and are positive measures in that they provide additional space for recreation. In many areas, such as around Ashdown Forest, the Exe Estuary, the Dorset Heaths and the Thames Basin Heaths SANGs have become popular destinations in their own right providing a popular and well-used resource for local communities. SANG, where applicable, can also fulfil a range of other functions, including biodiversity net gain and flood management.

5.2 There is a growing evidence base on the effectiveness of SANGs in coastal locations (e.g. Caals, Panter and Liley, 2022) and looking ahead there is a need to provide greater clarity about the level of SANG provision required from different developments in Essex and clear guidance on what SANG should look like and how it should work.

5.3 Development proposals within the Zone of Influence are required to contribute to the Essex Coast RAMS to address the in combination recreational impacts arising from growth across the region. However, applicants should also be aware that some schemes may give rise to alone impacts on designated European sites that are not fully addressed through the strategic RAMS measures. Where project level assessment identifies the potential for significant effects in isolation, additional, bespoke mitigation may be necessary to ensure compliance with the Habitats Regulations. In such cases, the provision of Suitable Alternative Natural Greenspace (SANG) or other targeted mitigation should be considered to avoid adverse effects on site integrity.

5.4 Broadly, developments that are 500+ dwellings are most likely to have alone impacts on the European sites, however development proposals for far fewer dwellings in close proximity to the designated site boundary will also pose particular risks. Any development that has impacts alone may be required to provide additional mitigation through the provision of SANG and will need to consult with Natural England.

5.5 Additional information about SANGs in Essex will be set out in an additional planning guidance note that will supplement this strategy. The additional guidance will cover the role of SANG in addition to a RAMS contribution, when SANGs might be required and how SANGs fit with the RAMS. Developers should consult this guide in addition to this strategy to ensure they are meeting their planning obligations.

6. Implementation

Types of development covered

6.1 This strategy applies to any future development that results in a net increase in residential units (i.e. Use Class C3) located within the identified Zone of Influence (ZOI).

6.2 Although primarily focussed on C3 residential development, this strategy also applies to other residential or overnight accommodation, that may give rise to recreational impacts on European Sites and therefore trigger Likely Significant Effects (LSEs). Table 4 lists the development types where LSEs are expected, or may be expected.

6.3 For the development types listed in Table 4, this strategy provides a consistent and effective mechanism to secure mitigation for in-combination recreational impacts arising from net new development within the ZOI. Where appropriate, and supported by project level HRA, the RAMS tariff may also be applied to other forms of development beyond C3 dwellings, to ensure recreational impacts are fully addressed.

6.4 Developments not listed in the table, but which may also trigger likely significant effects include, but are not limited to:

- Hotels (C1) – including boarding and guest houses;
- Tourism attractions (F1, Sui Generis).

Table 4: Relevant types of development

Use Type/Class	Likely Significant Effect	Mitigation requirements
Dwelling Houses (C3) including live work units *This applies to net new dwellings and excludes like for like replacement dwellings.*	Yes	Contribution per dwelling
Houses in Multiple Occupation (C4/Sui Generis)	Yes	Contribution per bedroom (based on C3 per dwelling contribution)*
Residential Institutions (C2/C2A) Sheltered accommodation, extra-care, nursing homes, hospitals and secure institutions.	Possibly, will be considered on a case-by-case basis dependant on mobility/independence of residents and proximity to European Sites. This generally excludes high dependency and end of life care.	Contribution per dwelling or justified reduced rate based on bedspaces (2.46 bedspaces = 1 dwelling)
Residential Institutions (C2/ Sui Generis) Schools, colleges or training centres and Student Accommodation	Possibly, will be considered on a case-by-case basis. If a training centre or college has associated adult accommodation where residents/occupants can visit the European Sites.	Contribution based on bedspaces (2.46 bedspaces = 1 dwelling)*
Gypsy and Traveller Pitches / Plots (Sui Generis) Net new temporary or permanent pitches	Yes	Contribution per pitch/plot
Caravan, chalet, touring and static holiday sites (Sui Generis)	Likely LSE, especially where located within 1.5 km of the coast	Contribution per unit/pitch (equivalent to per-dwelling rate)

* Some Local Planning Authorities apply a discounted rate, and it is advised to check with local guidance and the Supplementary Planning Guidance for more information

6.6 While residential development represents the primary source of recreational pressure, other land uses can also create significant impacts on European sites - particularly those involving overnight accommodation, high visitor turnover, or public recreational use. Any type of new overnight accommodation within 1.5 km (approximately a 15 minute walk) of the Essex coast, for example, is likely to give rise to recreational disturbance and therefore require mitigation.

6.7 For C3 residential development, contributions will be calculated on a per-unit basis. However, this approach may not be directly applicable to other forms of development, such as tourist accommodation or visitor attractions.

6.8 For development types not falling within the standard per dwelling tariff model, the potential for LSEs must be assessed through project level

Habitats Regulations Assessment (HRA) and advice sought from Natural England where necessary, and any required mitigation confirmed through appropriate assessment. Where recreational impacts cannot be ruled out, the RAMS tariff may be used as an appropriate and proportionate mitigation measure for 'in-combination' impacts, including for hotels, holiday parks, other overnight accommodation and tourist attractions. Proposals that are deemed to have 'alone' impacts will require additional bespoke mitigation. In such cases, payment of the RAMS tariff covers residual impacts.

6.9 Project-level HRA for tourist attraction and hotel related proposals will need to take into account both the type of use and its proximity to European sites. For example, a business focused hotel in Chelmsford city centre is unlikely to generate the same recreational pressure as dog friendly holiday accommodation located adjacent to a designated site. Each proposal will therefore need to be assessed on a case-by-case basis to determine whether LSEs are likely and whether additional mitigation is required to address 'alone' impacts.

6.10 Further detail on development types covered and the application of tariffs and bedspace calculations will be provided within Supplementary Planning Guidance. Developers should refer to this guidance, alongside the Essex Coast RAMS, to ensure all planning obligations and HRA requirements are fully met.

Zone of Influence and the area covered by the strategy

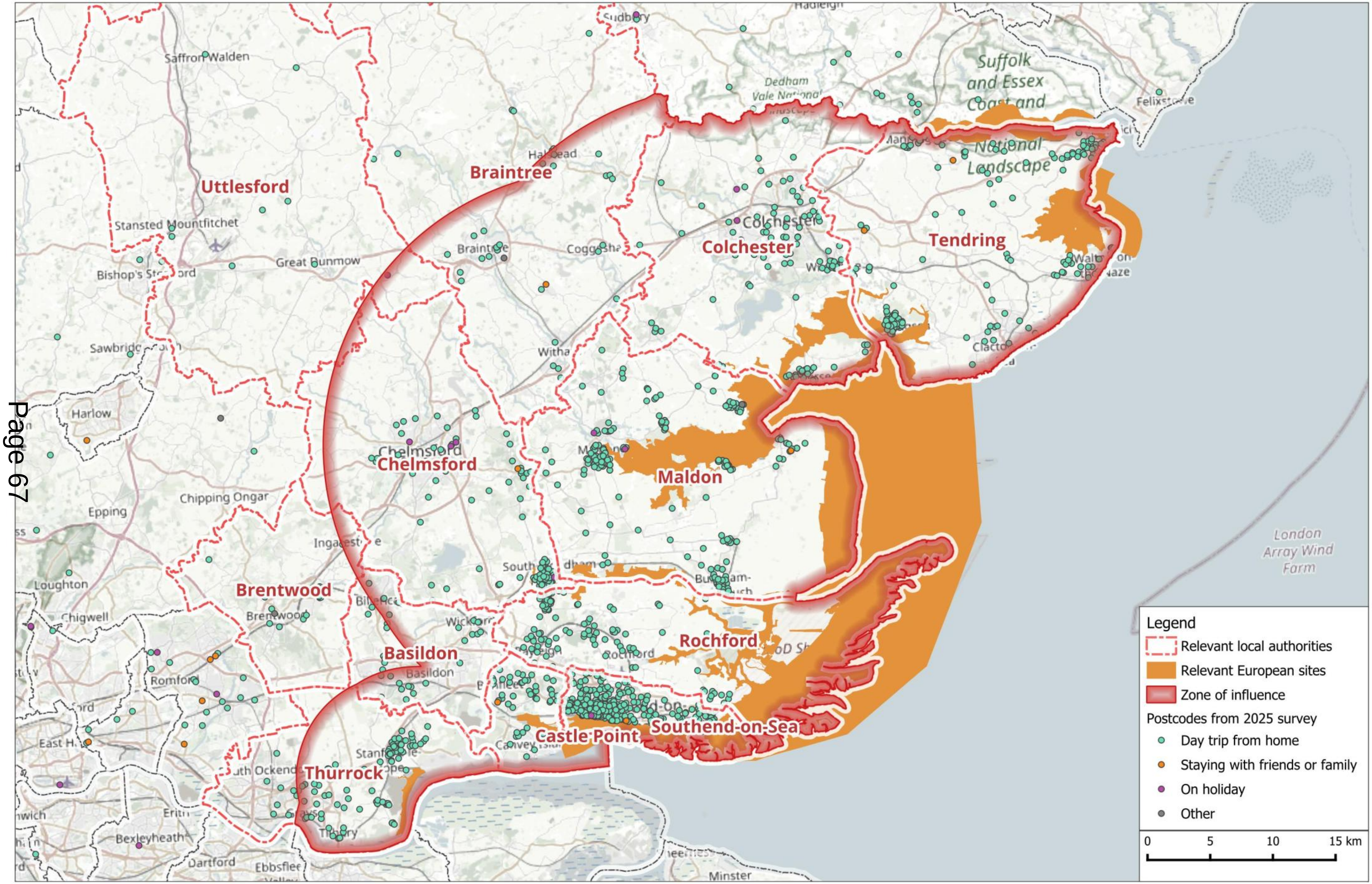
6.11 The Zone of Influence is shown in Map 5. This is the established Zone of Influence, which was originally derived separately for each SPA and then merged, with values for each separate SPA ranging from 4.5 to 22km (see Table 4.4 in Place Services / Essex County Council, 2018). Recent postcode data from the 2025 visitor survey (Rush et al., 2025) is included on the map for context and demonstrates that the zone works to capture the majority of visitors and remains fit for purpose.

HRA matters and other assessment considerations

6.12 This strategy does not replace the requirement for HRA in relation to recreational impacts at plan or project level. Instead, it provides a mechanism to provide mitigation to support appropriate assessment and addresses the cumulative effects of recreation across a wide area. For most development types and locations, conformity with the strategy will potentially allow a conclusion of no adverse effect on site integrity in respect of recreational pressure. In some cases, the strategic mitigation delivered through the RAMS may not however be sufficient. Developments in particularly sensitive locations—such as those immediately adjacent to European sites—may require additional, bespoke mitigation measures beyond the RAMS tariff. These will need to be identified and secured through project level HRA. As such the strategy does not remove the need to consider whether individual developments may also give rise to impacts alone.

6.13 It should also be noted that the strategy does not address other potential impact pathways, such as air quality or water quality, which must be considered separately where relevant to European sites. It should also be noted that recreation impacts to SSSI features may not necessarily be covered by the mitigation strategy (if those features are not qualifying features of the European sites). These may warrant separate consideration and mitigation in their own right.

Map 5: Zone of Influence and interviewee postcodes from visitor survey



Scale of future development

6.14 Around 148,309 new dwellings have been estimated as coming forward in future local authority plans and requiring mitigation. This total is broken down by authority in Table 5. The estimates take into account each authority's local plan housing requirement and discounts a proportion of the homes which are unlikely to make a fee contribution to the RAMS. This step removes homes which are already permitted or would be complete by the base date (April 2026). To keep the calculation simple, no discount was made for non-qualifying types of residential or lapse rates. Full details of how the different totals have been derived are provided in Appendix 2.

6.15 The estimates are therefore intended as an approximate guide and derived as a snapshot at a particular point in time. They may not necessarily be an accurate representation of future development. They are however sufficient to determine the scale of mitigation likely to be required and therefore to allow a tariff to be set.

6.16 In 2025 there were approximately 609,786[12] residential dwellings within the Zone of Influence shown in Map 5. The estimate of 148,309 new dwellings would therefore represent a 24% increase in the amount of housing within the Zone of Influence.

Table 5: Summary of housing growth potentially requiring mitigation, by authority (see Appendix 2 for further details). Note stage of plan preparation reflects a snapshot at the time of writing

LPA	Stage of Plan Preparation	Plan Period	Potential housing requiring mitigation
Basildon	Reg 18 Local Plan	2023-2043	21,667
Braintree	Reg 18 Local Plan Review – March 2026	2026-2041	11,493
Brentwood	Adopted 2022, Call for sites - Reg 18 2026	2026-2042	3,060
Castle Point	Plan was submitted for Examination in January 2026	2026-2043	5,457
Chelmsford	Reg 19 Local Plan Review, Submission 2026	2022-2041	19,755
Colchester	Reg 18 Local Plan Review - December 25	2026-2042	16,435
Maldon	Exploring options to transition into the new plan-making system in 2026	2023-2043	9,521
Rochford	Reg 18 consultation February – March 2026	2023/24 - 2042/43	12,456

[12] Total extracted from national postcode data and relates to the residential delivery points per postcode within the Zone of Influence.

LPA	Stage of Plan Preparation	Plan Period	Potential housing requiring mitigation
Southend	Preferred Approach Consultation 2025, Reg 18 summer 2025	2025-2050	25,444
Tendring	Reg 18 Preferred Options consultation	2025 – 2042	12,851
Thurrock	Local Plan Initial Proposals, Reg 19 2026	2024-2044	10,170
Uttlesford	Full Council in March 2026 to be invited to adopt the Local Plan	2021-2041	0
Total			**148,309**

Costs per new dwelling

6.17 The total cost of SAMM measures is estimated to be £72,594,500 (see Appendix 3 for details). Per dwelling costs are set out below, calculated using the housing growth figures from Table 5. Costs for SAMM will be adjusted to take into account any reserves held by the partnership at the point at which the new strategy supersedes the previous one, giving a cost per new dwelling of £475.70.

Total cost SAMM:	£72,594,500
Approx. RAMS monies held by accountable body[13]:	£2,043,416.31
Estimate of number of houses needing mitigation:	148,309
Cost per new dwelling:	£475.70

6.18 The tariff will be further adjusted on an annual basis to take into account RPI Index linked inflation, any administrative costs and any other adjustments necessary. Housing growth will also be monitored and taken into account as part of future adjustments.

[13] This figure includes RAMS tariff held by the Accountable Body, and the interest accrued on held funds to date

Long term delivery and in-perpetuity costs

6.19 Mitigation is secured for the duration of the impact, and it is assumed the implementation of the mitigation will run for as long as it is required, with money set aside to provide long-term stability and in-perpetuity delivery. The strategy will operate on a rolling basis into the future, adjusting as necessary to changing levels of house building and impacts arising. The inclusion of in-perpetuity costs is one of the factors behind the increase in tariff compared to the previous strategy.

6.20 Some measures in this strategy are short-term, one-off measures while others need to run for many years, often extending well outside the Plan period. Changes to access infrastructure, the provision of any SANGs (which are secured indefinitely) alongside the increased awareness raising and education work should ensure that the need and annual cost for SAMM can decrease with time. As behaviour change (such as responsible dog ownership) is more widely accepted, high levels of ranger time may no longer be so relevant. It will be important for regular review and revision of costs as necessary to adjust the amount set aside for long term funding of mitigation measures. As such, SAMM is unlikely to need to be constant over time. The measures have been costed for in perpetuity (taken to be a minimum of 80 years, see Appendix 3). Costs and timing can however be reviewed and adjusted on a 5 yearly basis, allowing resources to be targeted different as necessary. Where measures are short-term or one-off, such as small infrastructure projects, it is anticipated that further short-term or one-off measures in different locations around the coast would come forward in later years of the strategy and the costs are therefore spread over an 80 year period.

Governance

6.21 There is already an established approach to the governance and implementation of the Essex Coast RAMS via the Essex Coast RAMS Partnership, which consists of local authorities, Essex County Council, conservation organisations, landowners and statutory bodies. The partnership is governed by a project board and the RAMS steering group whose activities are underpinned by a Partnership Agreement. The Essex Coastal Forum (ECF) a members led forum that discuss and recommend action on coastal issues provides democratic oversight on the project. In addition, one of the partner authorities is nominated as the Accountable

Body for the project and are responsible for holding the RAMS funds from developments that have commenced across Essex and for providing the financial procedures and protocols in its management. They also act as the Lead Institution and employ the RAMS Delivery Manager and project rangers, the 'Bird Aware Essex Team', who are responsible for co-ordinating and delivering the mitigation on the ground.

6.22 Figure 3 sets out the governance roles and arrangements of the Essex Coast RAMS implementation and its Partnership.

6.23 There is flexibility in the structure to allow for additional working groups to be established to support the implementation of the Essex coast RAMS, such as the RAMS Delivery and Technical Group, a group of landowners and land managers, technical and specialist people that provide relevant coastal expertise, knowledge, experience and on the ground direction / support to the Bird Aware Essex Coast team.

6.24 It will be important, looking forward, that there is flexibility and regular review as to how the contributions are spent and to assess the scope and nature of any necessary future mitigation projects. It will be essential that the mitigation delivery can respond to change and shifting priorities. There is uncertainty as to how priorities might need to change in the future, and such uncertainty can only be addressed through good monitoring, adaptive mitigation and regular review.

6.25 The need for flexibility will relate to the changing coastline and the impact of extreme weather events which could affect the qualifying features, visitor behaviour and the coastline itself. The King Charles III England Coast Path will also provide new opportunities for access and may change how people use the coast. Changes in housing delivery may affect how much mitigation revenue is collected and the scale of mitigation required.

6.26 Certain elements within the mitigation package have the scope to adapt and flex as conditions and priorities change. Furthermore, it is possible that additional opportunities may arise, for example as a result of changing land ownership. It is important therefore that the governance is responsive enough to enable developer contributions to be shifted to different components of the strategy easily. Annual reviews of budgets and the ability for the Delivery Manager to adjust finances as appropriate will be key.

6.27 The partnership also highlight the importance of the various delivery partners, for example site managers and other staff in the RSPB, Essex

Wildlife Trust, the National Trust, Essex County Council and Natural England. It is essential for the RAMS Delivery Manager to work with such organisations on the Essex coast RAMS delivery.

6.28 Additional flexibility could be accommodated within the structure for relevant stakeholders and organisations to bid for small amounts of money for particular projects that have a clear mitigation benefit and fit with the strategy. The governance and detail of such an arrangement would need to be set out and agreed by the RAMS Steering Group and Project Board to ensure proper governance arrangements are put in place beforehand.

Review and timing

6.29 The strategy will operate indefinitely on a rolling basis, with this version running to around 2031. The strategy has, however, been written in the context of local plans and the likely levels of growth to around 2045. The strategy will need to be reviewed and updated approximately every 5 years, with these reviews checking housing numbers, delivery, costs and mitigation priorities. The reviews will inform the 1 year and 5-year business plan that underpins the work of the partnership and their staff.

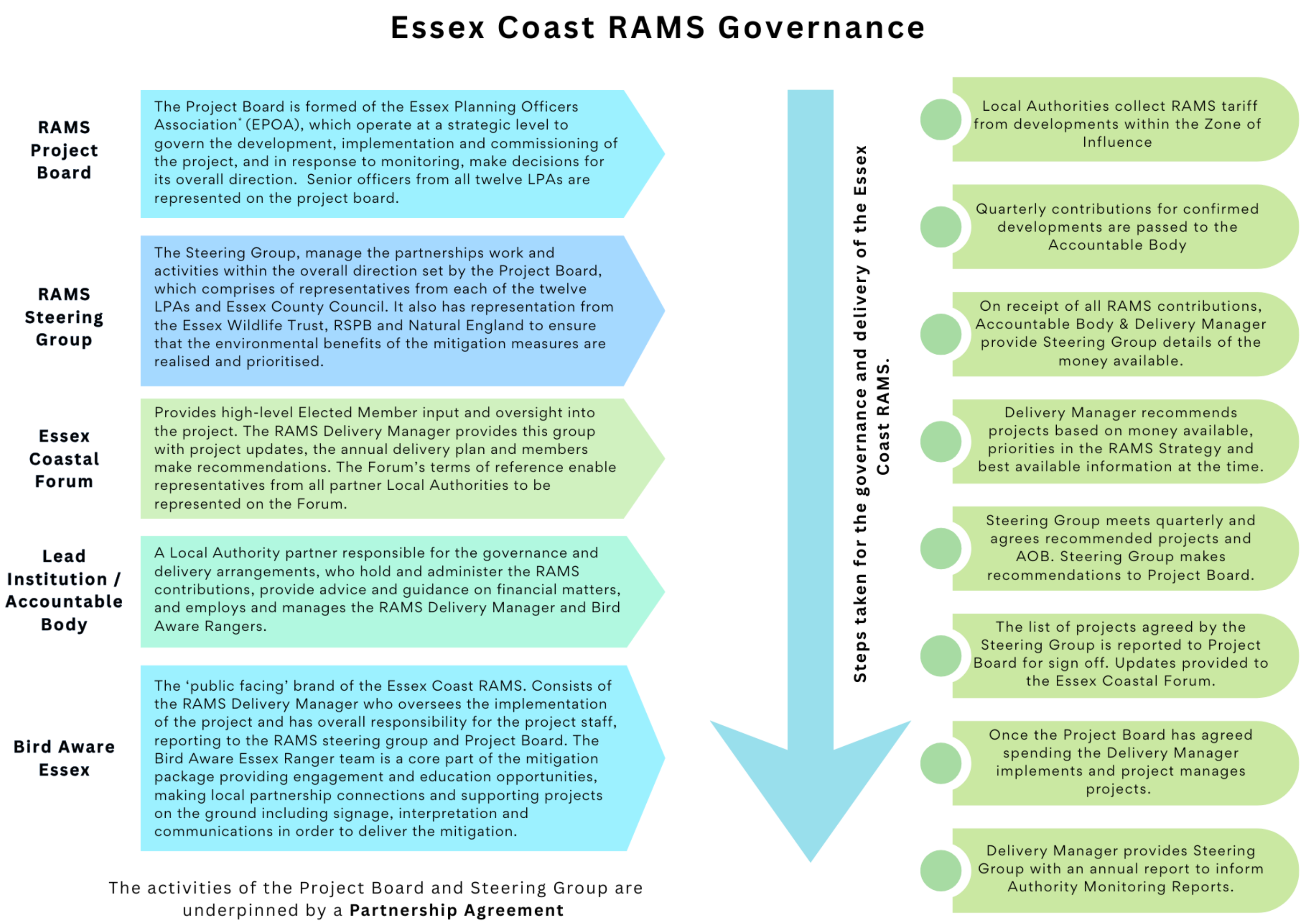


Figure 3: Summary of governance structure

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Glossary

Competent authority: A body authorising, permitting or giving consent. This can include a public body that decides to give a licence, permit, consent or other permission for work to happen, adopt a plan or carry out work for itself,; a statutory undertaker carrying out its work; a minister or department of government, or anyone holding public office, such as a planning inspector, ombudsman or commissioner.

EiP: Examination in Public. the final independent assessment of a local council's development plan before it can be formally adopted.

European site: A site protected by the Conservation of Habitats and Species Regulations 2017 as amended (known as the Habitats Regulations).

Green infrastructure: A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

Habitats Site: Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.

HRA: Habitats Regulations Assessment. A legal assessment process conducted by a competent authority to determine if a plan or project will adversely affect the integrity of a protected European site

LNRS: Local Nature Recovery Strategy. A statutory system of 48 spatial strategies covering the entire region of England, designed to reverse biodiversity decline.

Local plan: A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community, under the Town and Country Planning (Local Planning) (England) Regulations 2012. A local plan can consist of either strategic or nonstrategic policies, or a combination of the two.

MCCA: Mayoral Combined County Authority

RAMS: Recreational disturbance Avoidance and Mitigation Strategy

Ramsar site: Wetlands of international importance, designated under the 1971 Ramsar Convention.

Reg 18: Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 is the initial statutory stage of public consultation in the local plan-making process.

Reg 19: Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 defines the pre-submission stage of a Local Plan, where the final proposed plan is published for public consultation before submission to the Secretary of State.

SAC: Special Area of Conservation. Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.

SANG: Suitable Alternative Natural Greenspace. New or enhanced greenspace, aimed at deflecting visitors away from the European sites and creating more space for recreation

SAMM: Strategic Access Management and Monitoring measures. Mitigation measures targeting behaviour change and visitor management measures on and around a European site.

SPA: Special Protection Area. Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.

SSSI: Site of Special Scientific Interest. Sites designated by Natural England under the Wildlife and Countryside Act 1981.

Sui Generis: buildings that do not fall within any particular use class for the purposes of planning permission

Zone of Influence: Area within which likely significant effects are triggered by new development and mitigation therefore required.

Appendix 1: Potential opportunities for site specific projects and opportunities

Potential opportunities for more site-specific projects were identified in a series of workshops hosted in September 2025. Opportunities are listed below and the numbers cross-reference to the corresponding map (see Maps 6 - 9 at the end of this Appendix). The opportunities listed are not intended to be exhaustive and neither do they reflect any specific commitment or firm proposal for any location. Many are suggestions only and will require further work by partners and Bird Aware Essex before the level of mitigation benefit can be confirmed.

Stour Estuary and Hamford Water

1 - Scope for ranger focus and engagement at launch points (note that point falls within Suffolk and has already been identified as a potential Suffolk Coast RAMS project location by Wildlife Wise).

2 - Potential to monitor EWT Hogmarsh Island for water users and disturbance.

3 - Scope for ranger focus and engagement on the Manningtree seawall – busy location used by dog walkers. Additional scope for signage & engagement in the nearby library and town, including installation of a leaflet box.

4 - Potential to enhance existing signage near Mistley at Manningtree Beach bathing area and engage with water-based activities in this area. Note that Wildlife Wise have also identified this location as a launch site for paddleboards and kayaks within the Suffolk Coast RAMS and have suggested the implementation of a range of signage/interpretation and/or guidance.

5 - Scope for continued ranger focus and engagement at Hopping point and where Mistley Walls road runs parallel to the estuary. The Mistley walls frontage towards Manningtree (from point 4) is a key engagement location, with dog focussed engagement also warranted here.

6 - Scope for engagement with pop-up camp site.

7 - Scope for ranger focus and engagement at private access/launch point. Raised by NE that they are concerned about disturbance from watercraft. Note that Wildlife Wise have also identified this location as a launch site for windsurfers and paddleboards within the Suffolk Coast RAMS and have suggested the implementation of a range of signage/interpretation and/or guidance.

8 & 9 - Scope for screening installation and signage between the two points to protect small roost, although note steps for beach hut access. Clarification of land ownership along this stretch of beach would also be beneficial. A people counter is already in place at Wrabness but may need upgrading at some point.

10 - Scope for ranger focus and engagement with land/business owners and holidaymakers/beach hut occupiers between Stone Point and Wrabness Point. Note also identified as such by Wildlife Wise in the Suffolk Coast RAMS.

11 - Potential to increase ranger coverage and update interpretation signage at Wrabness Nature Reserve, working with EWT. Also scope to undertake bird disturbance study to inform mitigation.

12 - Scope for engagement/promotional material targeting holidaymakers Wrabness Community Shop (by station): opportunity to engage with tourists/promotional material.

13 - Scope for (infrequent) dog-focussed pop-up events at Stour Woods. Site is part of a circular walking route, has a public car park, and is currently leafleted. Maybe also SANG potential (although note SSSI status).

14 - Potentially update RSPB signage at Copperas Creek and target ranger focus/engagement with kayakers and small boat users.

15 - Scope for engagement with seal boat trip operators running from Ha'penny Pier and with those undertaking the ferry crossing. The latter would benefit from a joined-up approach with Wildlife Wise on the Suffolk coast and the National Landscapes team.

16 - Scope for engagement with training providers on boating lake.

17 - Scope for ranger focus and engagement at public launch ramp used by jet skis.

18 - Scope for ranger focus, engagement, and increased signage at West End Lane car park (main access point).

19 - Compensatory habitat creation (via BUDS[14]?) already planned near Dovercourt. Comprises a good launch point and would benefit from increased ranger focus/engagement.

20 - Potential to install/update existing signage, carry out engagement, and install screening at Dovercourt Holiday Park, targeting unofficial access routes across

[14] Beneficial Use of Dredged Sediment project

saltmarsh. Note current concerns around Planning Consent conditions placed on the caravan site not being adhered too.

21 - Already a proposed compensatory habitat location and location of a new (lowered below seawall) Public Right of Way around inland of site. Also scope for signage and temporary (breeding season) fencing between points 18 and 19, which would require permission from the wildfowlers.

22 - Scope for continued ranger focus and engagement, or ideally signage and closing of access, at breeding/roost locations at the sensitive Irlam's Beach. Note that this is a very controversial area linked to proposed compensatory habitat at Bathside Bay.

23 - Scope for long-term support for water-based engagement/presence at Hamford Water, building on existing relationships, which would require boat access (currently provided via Tendring water officer)

24 - Scope for ranger focus and engagement at Beaumont Quay car park; sea wall facilitates access to rest of the coast.

25 - Potential to monitor EWT Skipper Island for water users and disturbance: an important roost site.

26 - Scope to ensure longevity of safe roost areas on Horsey Island via the use of BUDS.

27 - Potential ranger support/funding for summer wardens at Horsey Island Little Tern colony and ranger focus/engagement in winter at the important high tide roost.

28 - Scope for ranger focus and engagement (and signage?) at Stone Point.

29 - Scope to ensure longevity of safe roosting and breeding areas at Stone Point via the use of BUDS.

30 - Potential for fencing and engagement around entire spit area to protect breeding birds whilst maintaining access for local people.

31 - The Naze: key area for engagement across the day (car park, three cafes, etc). Also scope to work with schools or education groups and EWT, potentially including production of a dedicated education pack.

32 - Scope for engagement/ranger focus at Titchmarsh Marina, including with seal boat trip operators.

33 - Scope for engagement/ranger focus/signage at key access points for kite surfers along Island Lane and paralleling Quay Lane in Kirkby-le-Soken.

Blackwater and Colne Estuaries

34 & 35 - Circular walk around Howlands Marsh NR - currently inaccessible and protected for birds but with new UK Coast Path this area will be accessible during the summer. Will also include St Osyth Creek – scope to benefit from better engagement with Bird Aware ranger presence from the beginning. Shrangri-la Caravan Park is now designated for homes so potential for increased disturbance in this area – would benefit from advance signage and liaison with Essex Highways re: access. Also, an important opportunity to undertake monitoring before housing is built/progressed and before the coast path is opened, to measure the impact of both and target subsequent management.

36 - Designated water ski area up Brightlingsea Creek (past Cindery Island) towards Flag Creek; scope for engagement with private club.

37 - Colne Point seawall/Lee-over-Sands; disturbance from antisocial behaviour, quad bikes, and scramblers on the nature reserve. Suggestion that concrete bollards are being installed by resident's group, but Bird Aware influence may also be needed in the future.

38 - Brightlingsea Creek; Share our Shore signs have been effective here and closed one of the desire lines (would be great to replicate elsewhere) alongside ranger provision. Colchester City Council has jurisdiction on the River Colne rather than the Brightlingsea Harbour Master (who only manages Brightlingsea Creek).

39 - Scope for engagement with the caravan parks.

40 - Disturbance by people walking across to Sandy Point; a very popular area with watersports. The creek is silting up, giving bridging access from Point clear – a future concern calling for wider discussion and engagement with landowners to de-silt or identify other options to manage access. Scope to continue ranger presence on site for detailed beach-nesting bird monitoring, visitor engagement, and recreational disturbance reductions.

41 - Sandy Point (Colne Point) has the largest Ringed Plover and beach-nesting Oystercatcher populations – previous Bird Aware presence/signage at Point Clear was effective. The site is nearly joining up with Point Clear as a result of sediment deposition. Scope to continue the Share Our Shores project, with seasonal support, volunteers during the breeding season, better signage, improved fencing, and disturbance monitoring. Site would also potentially benefit from the zonation of seasonal access.

42 - Popular location for people to drop anchor and access the beaches, swim, etc. Existing signs advise not to stray to other areas, but need to be more obvious. Scope for 'interactive maps' – directing people to good places/encouraged for activities and identifying areas to avoid.

43 - Scope to work with the harbour master around speed restrictions and enforcement on the water. Could include buoys and engagement on the water, alongside potential resourcing of enforcement teams.

44 - Ferry Landing; watersports access point, although many people also access from the adjacent holiday park. Potential for summer signage about nesting birds and/or temporary fencing on the spit guiding walkers along a particular route to avoid nesting birds.

45 - Desire line here down to the salting/shoreline by existing sign. Opportunity to close it off.

46 - Scope to update signage by railway line (replace damaged Natural England signs).

47 - Scope to update signage in this area.

48 - Place services grant fund in place to excavate a Tudor fort – would benefit from discussion around timing and reducing disturbance. EA are also doing repairs in this area. Opportunity for future engagement, either when the works are finished or whilst it's happening (could include a story trail linked in with Bird aware, engagement alongside the Country Park, and signage across the site). Scope also for improved paths and dog-focussed engagement.

49 - Scope for targeted engagement with commercial dog walkers at Cudmore Grove Country Park. The second car park is also used by dog walkers and could benefit from engagement and signage (potentially including a community noticeboard). Also potential to identify circular routes to draw people away from certain areas at different times of year around Cudmore Grove Country Park, deflecting them from the beach/sea wall.

50 - Scope for engagement with the caravan park. Also, a launch point, so potential to target watersports too.

51 - Arlesford Lodge; water and beach access points, beach access would benefit from increased signage and ranger presence.

52 - Scope to increase buoys and signage (e.g. speed limited) for boats and other watercraft near Arlesford Creek, potentially working with the Harbour Master, as most of the disturbance in this area is water-based.

53 - Wivenhoe down to Arlesford Creek; launch points and jet ski's – scope for increased signage and ranger presence.

54 - Potential for signage and engagement at footpath by Wivenhoe Sailing Club.

55 - Potential for signage and engagement at moorings at Rowhedge.

56 - Potential for signage for jet skis/watercraft at managed realignment at Fingringhoe Wick EWT Reserve.

57 - Pyefleet Channel; seals loafing at the saltmarsh at this point (towards the Strood), with boats travelling to see them from Brightlingsea and elsewhere – scope for water-based engagement (limited onshore access).

58 - Waldegraves Farm Caravan Park; water sports launch point. Scope for signage, as well as engagement with the caravan park and watersports community.

59 - Shingle island located 200m offshore from Waldegraves Holiday Park is important for waders and gulls, terns, etc. It's currently a handy point to paddle out to from the holiday park. Scope to reduce landing and disturbance to the birds using the island via engagement and signage.

60 - Drones and kite surfers launch from West Mersea and cause disturbance around Old Hall Marshes and Tollesbury Wick; scope for engagement. Also scope to add bird information to Bathing Water signage at West Mersea Beach.

61 - Tom & Teds dog walking area on the Strood greenspace; scope for engagement with dog walkers/owners.

62 & 72 - (Route runs between) Feldy Marshes; there will be increased access via the coast path when it opens, running all the way to Salcott - opportunity for engagement. Would potentially be beneficial to include Bird Aware messaging on coast path signage/interpretation.

63 - Hammerhead Jetty is owned by Colchester City Council and is a public launch point; scope for engagement/signage.

64 - West Mersea Yacht Club owns/operates the moorings; opportunity for engagement/communications.

65- Packing Shed Marsh Trust; scope to provide continued support and engagement opportunities (note that this would require water-based access).

66 - Cob Marshes; good population of breeding waders and winter roost site. Scope for continued support and engagement opportunities.

67 - Old Hall Marshes; scope to extend and continue the work already being undertaken by Bird Aware (potentially with additional volunteer support), with planned work for next autumn. Seasonal ranger roles work well, but accessibility routes need to be considered. The combination of Share our Shores messaging, habitat creation, and the work of Bird Aware have all led to increases in on-site Ringed Plover activity and lowered levels of disturbance. Note that access across the site may require the use of an off-road vehicle, with associated time/costs associated with purchase/hire and staff training (one off cost per ranger renewed every 3 years).

68 - Copt Hall (National Trust); scope for Bird Aware Essex Coast to work with the Trust, potentially via signage and dog-focussed engagement in the site car park.

69 - Scope for engagement along seawall. Would potentially be beneficial to include Bird Aware messaging on coast path signage/interpretation. Potential to support current and future BUDS island creation in this area and provide dedicated ranger time.

70 - Disturbance from boats landing, anglers, low helicopters. Opportunity for a water-based ranger (or water-based access for the Bird Aware Essex Coast team) and scope to identify refuge areas. All islands within the Blackwater (e.g. Little Cob, Great Cob, etc.) have many roosting/wintering birds and monitoring would be beneficial here. A new BUDS location is also planned in the vicinity, with advance engagement with water users (concerning the importance of the new habitat for birds and requests not to land there) potentially also proving beneficial.

71 - Abbotts Hall Farm Nature Reserve will have an access point resulting from the opening of the UK Coast Path. It's likely that there will be no dog access into the farm, but the coast path will allow dogs – scope for ranger presence and visitor management, including signage and interpretation. A people counter is already in place here but may need upgrading at some point.

73 - Kayaks, stand-up paddleboards, and drones visit Old Hall Creek, although it's unclear where they are launching from. The whole area is important for birds, as it's usually relatively quiet. Also scope for engagement in the nearby Tollesbury Marina.

74 - Lauriston Farm and Goldhanger Creek area: potentially key location for engagement with both landowners and site users, and also important for birds. Scope for signage and targeted engagement with dog walkers on sea wall, with some potential scope for screening (although at a difficult location).

75 - Goldhanger pub; scope for engagement and important for birds.

76 - Osea Seawall also an important roost site towards Goldhanger, with scope for ranger stationing and patrols.

77 - Possible launch point; scope for ranger present and signage, etc.

78 - Osea Road Caravan Park & Heybridge Basin; scope for engagement at both. Note that the park is being extended which may lead to an increase in people accessing the seawall and estuary – need to consider future engagement.

79 - New BUDS project by roost at Northey Island. Would benefit from working alongside the National Trust to undertake monitoring and/or engagement with people on the water, with potential to enforce no landings.

80 - Planned enlargement at Osea Caravan Park; may affect Osea Island roost.

81 - Heybridge Basin and Gravel Pits likely comprise functionally linked land; scope for engagement with landowners about usage (although noted to be potentially contentious) and update of existing interpretation materials.

82 - Maldon Council funds the role of River Bailiff on the Blackwater. Scope for Bird Aware to support the service, which would be beneficial in the event of BUDS-related habitat creation.

83 - Promenade Park: key engagement location with potential for improved interpretation and dog-focused engagement.

84 - Northey Causeway; scope for renewed engagement and signage (although issues with vandalism) on access to the causeway, in partnership with the National Trust. Focus on Promenade Park also, as the main access point towards the causeway.

85 - Maylandsea is a popular site for boat and watercraft launches; scope for engagement. A people counter is already in place here but may need upgrading at some point.

86 - Steeple Point; popular for boat launching and watercraft – scope for engagement. Jet ski access from the slipway is also an issue which may benefit from targeted interventions, including partnering with the caravan park and council, alongside enforcement.

87 - St Lawrence supports intertidal seagrass (an SAC feature) subject to restoration activities; opportunity to ensure ongoing protection.

88 - Caravan park is subject to ongoing restoration works and will likely be busier in the future – would benefit from comms links, engagement, and partnership working. The location is an important access point for water-based activities , with scope for targeted visitor and landowner engagement.

89 - The slipway near the caravan park is likely to be more frequently used in the future. Also scope for engagement at rejuvenating saltmarsh area alongside Promenade Way.

90 - Opportunity for engagement with marina.

91 - Scope for engagement with Outdoor Essex at Bradwell Marina, alongside signage for paddlecraft at slipways, etc.

Dengie & Crouch and Roach Estuaries

92 - Scope for signage/ranger point at public car park near Bradwell Power Station.

93 - Opportunity to check for antisocial behaviour (e.g. off-road bikes), install barriers, or support landowners/liaise with police.

94 - Scope for signage to deter people walking out to the wader roost. Protection also of breeding birds, potentially including temporary fencing. Some monitoring along this stretch may also prove beneficial to allow for adaptive management/adjustment of the site-based approach.

95 - Potential for engagement with the Church of England and community settlement to the north re: info about birds/disturbance at St Peter's Chapel, with scope to install signage at the latter.

96 - Scope to install a new people counter at St Peter's Chapel car park and update the existing signage.

97 - Scope to reduce promotion/deter cyclists along the Dengie coastline – cyclists are not legally allowed along sea wall/public footpaths in this area already.

98 - Shell Bank; nesting site for Little Tern – scope for signage and additional monitoring.

99 - Potential paddlecraft launch point; scope for engagement with the landowner, alongside possible ranger presence and signage.

100 - Potential to work with local websites/operators to promote certain routes (hiking is currently promoted near Montsale).

101 - Potential paddlecraft launch point & angling location; scope to engage with the landowner, alongside possible ranger deployment and signage.

102 - Scope to engage with local landowners about access to the east of Burnham-on-Crouch.

103 - Scope for engagement with the new owners of the Wallasea Island foot ferry (potentially signage/info on ferry).

104 - Riverside Park; scope for engagement with dog walkers, with an aspiration to keep use within the park and off the intertidal area – possible SANG potential also.

105 - Scope for engagement with yacht clubs/marina at Burnham-on-Crouch.

106 - Creeksea launch area with road access; potential engagement point/liaison with landowners.

107 - Marina south of Althorne station; scope for community engagement and leafleting/engagement with visitors to the Crouch vineyards.

108 - Scope for engagement with the Bridgemarsh Island Trust (wildfowlers) and Crouch Harbour Master re: jet skis in the creeks.

109 - Blue House Farm; scope for providing information for dog walkers, including keeping out of waterbodies, reedbeds, and important bird areas.

110 - Blue House Farm; scope to engage in monitoring of low tide access, in terms of disturbance risk. Would also likely prove useful at a couple of other locations along the Crouch.

111 - Blue House Farm; potential to support grazing and lambing and roll out engagement alongside robust fencing to target dog attacks and related disturbance. Also scope for volunteer involvement seasonal support potential.

112 - Scope for engagement with yacht haven/marina/sailing club near Stow Creek.

113 - Stow Creek high tide roost; potential to maintain a watching brief.

114 - Potential for interpretation boards and bird hide in the future at Marsh Farm Country Park along footpath near the roost area.

115 - Opportunity to protect islands around wader roost (Clements Green Creek – Marsh Farm Country Park).

116 - Scope to institute speed restrictions/signage around Clements Green Creek for water-based access.

117 - Kayak/paddleboard launch point directly from housing near to Clements Green Creek; scope for engagement/signage.

118 - Opportunities for fencing to protect fields from access at Marsh Farm Country Park, particularly during winter months.

119 - Scope to support Marsh Farm Country Park with engagement and signage, particularly around dogs.

120 - Scope for (ongoing) engagement with local community and the Town Council at South Woodham Ferrers.

121 - Potential to engage with the Harbour Master/water police/community to reduce issues with jet skis.

122 - Scope for engagement alongside greenspace area.

123 - Two yacht clubs and water ski club at South Woodham Ferrers; potential engagement opportunity.

124 - Scope for engagement with Eyott Sailing Club.

125 - Woodham Fen wader roost; opportunity to reinstate people counter. A pressure point with Open Access, which adds to its vulnerability. Scope to support EWT here, potentially including increased ranger focus and access infrastructure.

126 - Scope for engagement with Hayes Country Park; residential access directly to the sea wall.

127 - West of Hullbridge and Kendal Park; opportunity to discourage dog access onto the saltmarsh via signage, screening, and engagement.

128 - Hullbridge; potential to upgrade people counter in Kendal Park. Also scope for engagement, signage, and interpretation.

129 – Scope for engagement at jet ski launch site near Hullbridge.

130 - Scope for engagement with the caravan park.

131 - East of Brandy Hole; key area for potential monitoring, as access may change in the future. Also, a (potentially occasional) jet ski launch point, which requires monitoring to confirm.

132 - East of Hullbridge; low levels of use from kayaks etc. Scope to maintain a watching brief.

133 - Lion Creek; narrow with a high risk of disturbance. Scope for ranger provision, screening, and/or signage to reduce disturbance here.

134 - Opportunity to run pop-ups at Wallasea Island with the RSPB, as necessary.

135 - Purdeys Industrial Estate; scope for ranger presence/engagement. There is a large boatyard here that may contain residential and visiting pleasure boats

Benfleet & Southend Marshes, Thames Estuary and Marshes, & Foulness

136 - Likely changes in access to Potton Island (MOD disposing of it); opportunity to maintain a watching brief.

137 - Likely changes in access to Rushley Island (MOD disposing of it); opportunity to maintain a watching brief. Scope to provide site-specific engagement and signage around seagrass with respect to trampling and mooring damage.

138 - Wakering Stairs; roosting waders, but recreational access to the saltmarsh - potential location for Ranger engagement, signage and leaflets. Scope to provide site-specific engagement and signage around seagrass with respect to trampling and mooring damage. There are popular guided walking tours to Foulness island via the Broomway from Wakering Stairs. Also note need for continued engagement with MOD over protection of Foulness SPA.

139 - Scope for engagement with kite surfing community on mudflats by East Beach. Scope to provide site-specific engagement and signage around seagrass with respect to trampling and mooring damage.

140 - Opportunity to produce a visitor management strategy for East Beach and Gunners Park, including focus on dog walkers, kite surfing, bait digging, and cockle digging, whilst ensuring engagement with local stakeholders (such as Coastwatch and Southend Association of Voluntary Services). Scope to provide site-specific engagement and signage around seagrass with respect to trampling and mooring damage.

141 - Increase in tourism (possibly from London) at East Beach via the train station; scope for engagement at the station and with other travel providers (e.g. C2C) and the bus stops around the site.

142 - Opportunity to enhance marker buoys around the accessible area of East Beach.

143 - Scope for additional resources, in terms of council (Bird Aware?) presence along Southend Foreshore.

144 - Near Gog’s Berth; scope for jetty engagement with bait diggers, alongside signage and access management.

145 - Scope for engagement with Thorpe Bay Yacht Club.

146 - The car park behind Uncle Tom's Cabin is a key access point and engagement location, including with the members of the kite surfing club and beach hut group.

147 - Opportunities for engagement with organised events (fireworks in winter, runs in summer (e.g. RNLI September fun run), etc).

148 - Mullberry Harbour; running and other groups run over sea grass at low tide, accessing from Thorpe Bay Beach.

149 - Scope to stop the trampling of Eel Grass beds; potential to institute a voluntary non-anchoring zone?

150 - Southend Pier; huge scope for visitor engagement.

151 - Scope for discussions with commercial watersport providers around the entire Southend area.

152 - Scope for engagement with watersports enthusiasts and updated interpretation along Southend foreshore.

153 - Chalkwell/Leigh-on-sea area: scope for general ranger-led engagement and updating of signage, particularly at water sports launch points near café.

154 - Opportunity to support messaging and resources concerning dogs entering the water at Two Tree Island.

155 - Scope to collect data from the foraging community about their access and what they are gathering, with people accessing the saltmarsh. Also scope for signage.

156 - Two Tree Island; opportunity to provide better protection for the borrow dyke, with dogs and people currently entering the water.

157 - Two Tree Island; potential to institute a voluntary non-anchoring zone to protect the sea grass, alongside engagement and provision of better mooring options that don't damage the seabed.

158 - Scope to support EWT and the local authority with signage identifying Two Tree Island as a nature reserve before people access it.

159 - Scope for a redesign of parking to influence visitor movements, alongside a targeted reduction in antisocial behaviour.

160 - Scope for engagement, awareness raising, and signage at Two Tree Island.

161 - Scope for engagement with model aircraft operators flying at Two Tree Island.

162 - Potential to create a visitor management strategy for Two Tree Island.

163 - Scope for a redesign of parking to influence visitor movements, alongside a targeted reduction in antisocial behaviour.

164 - Paddlecraft, swimming and water entry point on slipway; opportunity for guidance, engagement, and signage.

165 - Canvey Point; access point to historical roost site. Opportunity to limit access, allow roost to re-establish, and carry out monitoring. The area down towards the seawall at the bottom of the point is also busy and has potential for engagement.

166 - Scope for improved signage and engagement (including leaflet boxes) at Canvey Heights Country Park.

167 - Jet skis and motorcraft an issue at Hadley Ray Creek; scope to work with the marine police to find the launch point.

168 - Scope for a watching brief, make sure the barriers to the lagoon are effective. Monty's Lookout also comprises a potentially useful engagement location.

169 - Hadleigh Country Park; scope for engagement with paddleboarders and also potential to create circular routes and SANG.

170 - Opportunity for information board (long walks from here to Two Tree Island). A people counter is already in place here but may need upgrading at some point.

171 - Opportunity for signage on community buildings and businesses near Thorney Bay.

172 - Scope for engagement and ranger focus at Thorney Bay.

173 - Scope for engagement with dog walkers and cyclists at Bowers Marsh, alongside installation of a people counter. A key roosting and feeding area at which it may be possible to provide support to the RSPB.

174 - Jet skis activity linked to Hadley Ray Creek; opportunity for speeding restrictions and limiting use.

175 - Slipway for jet skis at Wat Tyler Park; scope for engagement and signage.

176 - Bikes accessing seawall at Fobbing; opportunity to support actions to stop antisocial behaviour.

177 - Bikes accessing seawall at Fobbing; opportunity to support actions to stop antisocial behaviour.

178 - Functionally linked land near Great Garlands Farm; opportunity to protect it from development.

179 - Standford Wharf; scope to restrict off-road vehicle access and raise awareness around nature conservation issues, support improved or additional signage across the site and at access points, and to jointly identify engagement opportunities with the landowner.

180 - Scope to introduce more barriers at Stanford-le-Hope Marshes.

181 - Stanford Wharf; scope to restrict off-road vehicle access and raise awareness around nature conservation issues, support improved or additional signage across the site and at access points, and to jointly identify engagement opportunities with the landowner.

182 - Illegal fishing occurs on the spit onto Mucking Flats; opportunity to control antisocial behaviour.

183 - Thameside Nature Reserve Car Park; potential engagement point for rangers. The second car park at the entrance to the reserve connects with the walking route from Coalhouse Fort and would potentially benefit from engagement, signage, etc.

184 - Opportunity to maintain a watching brief for bird use as the landfill near Mucking Flats is decommissioned.

185 - Scope to support reductions in antisocial behaviour (fires, etc.) near the lake.

186 - Scope to create, promote, and maintain a circular route between Coalhouse Fort and Thameside.

187 - Lagoon; opportunity for engagement and signage.

188 - Scope for ranger focus at Coalhouse Fort, with potential for signage (although issues with permissions due to sensitive nature of the site). Also, a potential engagement location here (in association with the public car park), with on-site facilities, café, etc. and potential scope for dog-focussed activities. Important to note that Council Ranger resources have been reduced on site.

Additional sites and opportunities added after workshop

189 – Hullbridge, potential for signage at access point to the PROW (Dengie & Crouch and Roach Estuaries).

190 – Scope for engagement at Kingsman Point, Brandy Hole Yacht Club and Riverside Café (Dengie & Crouch and Roach Estuaries).

191 - Potential for signage at access point to the PROW to the river, potential for engagement with South Fambridge residents (Dengie & Crouch and Roach Estuaries).

192 - Signage and leaflets at Riverside Village (Dengie & Crouch and Roach Estuaries).

193 - Baltic Wharf Industry Estate and Essex Marina - increased monitoring and potential for engagement here (Dengie & Crouch and Roach Estuaries). Note - There is also a large boatyard here and may contain residential and visiting pleasure boats.

194 – Scope for engagement at Eastend, Paglesham. Visitors to local pub likely to travel down the River Roach (Dengie & Crouch and Roach).

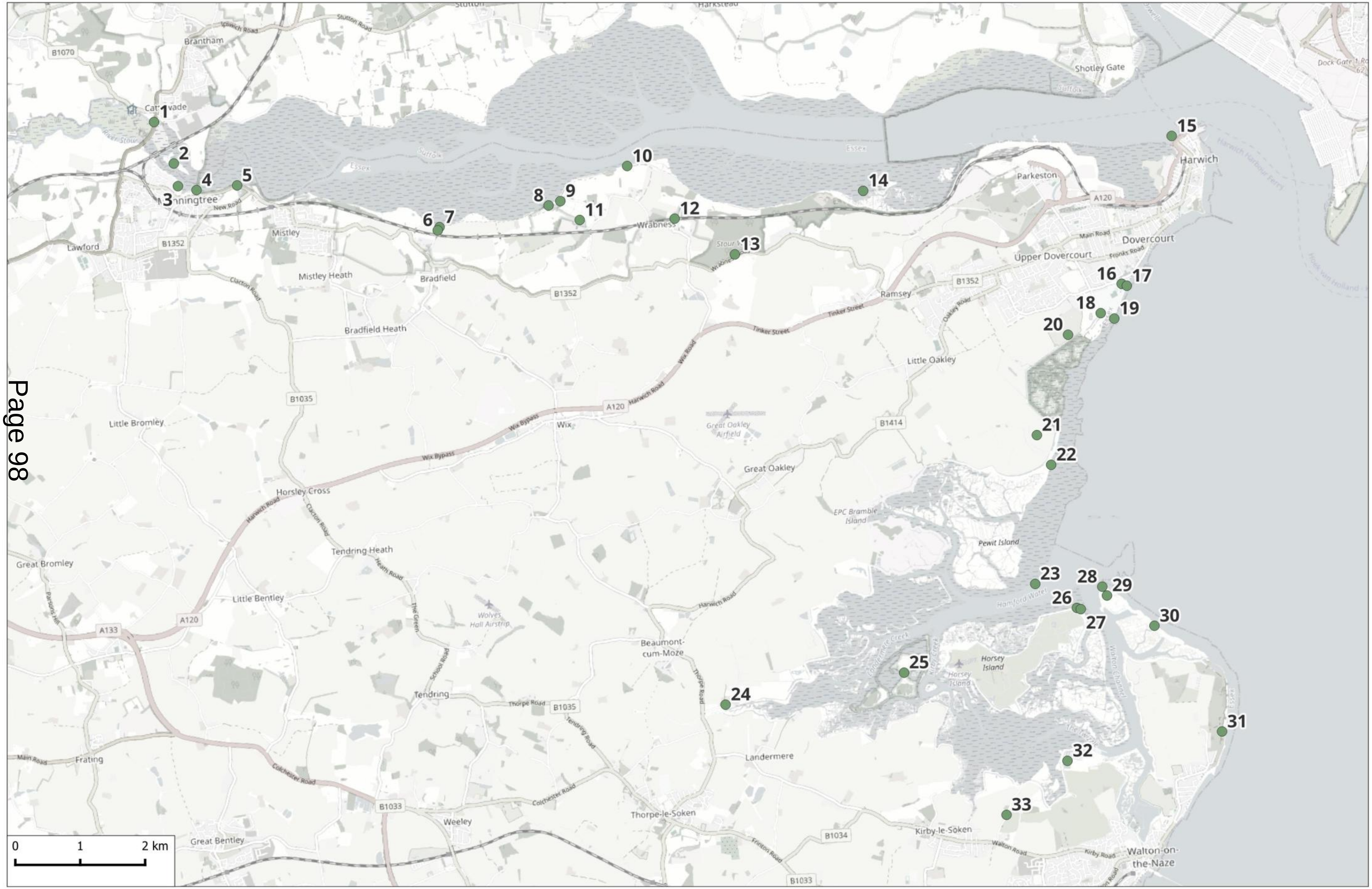
195 - Scope for engagement at Churchend, Paglesham. Visitors to local pub likely to travel down the River Roach (Dengie & Crouch and Roach).

196 - Scope for monitoring at Stannets Creek Reservoir (Dengie & Crouch and Roach).

197 - Scope for ranger presence/engagement and signage/leaflets at Barling Magna Wildlife Reserve (Dengie & Crouch and Roach).

198 – Scope for engagement at Little Wakering / Barling (Dengie & Crouch and Roach).

Map 6: Stour and Orwell Estuaries & Hamford Water workshop output (note the Orwell Estuary is dealt with under the Suffolk RAMS) **APPENDIX 1**



Page 98

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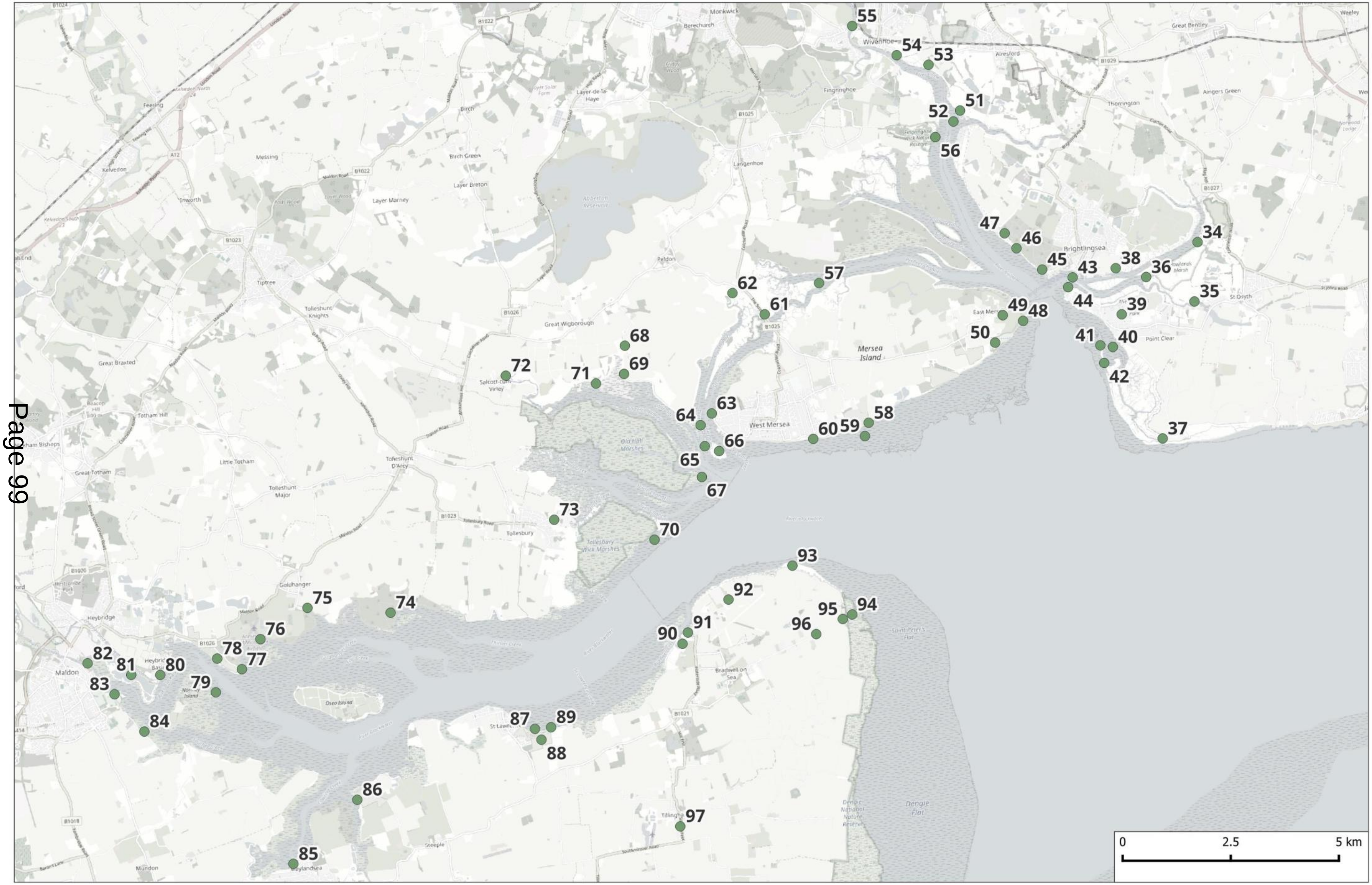
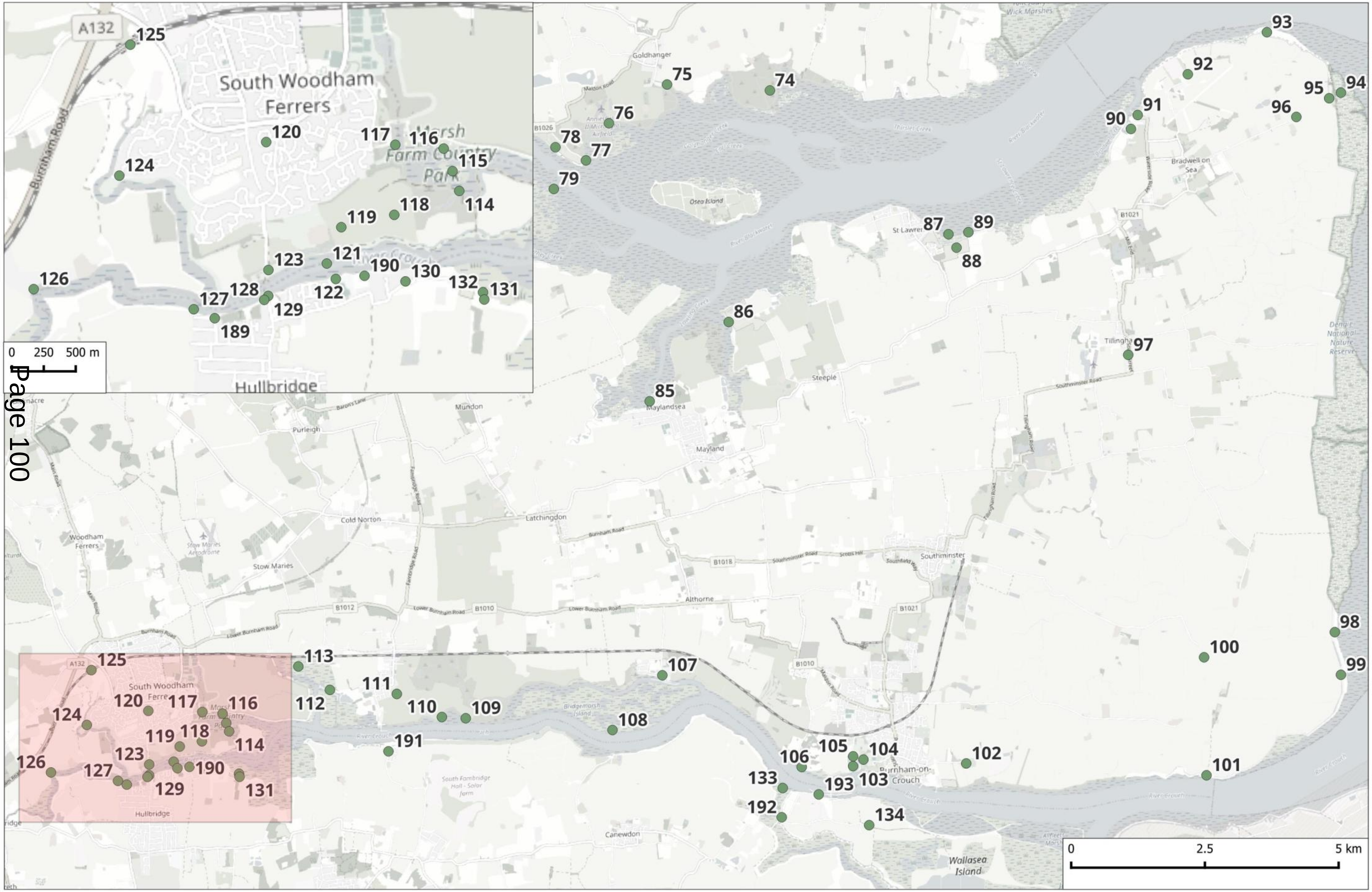
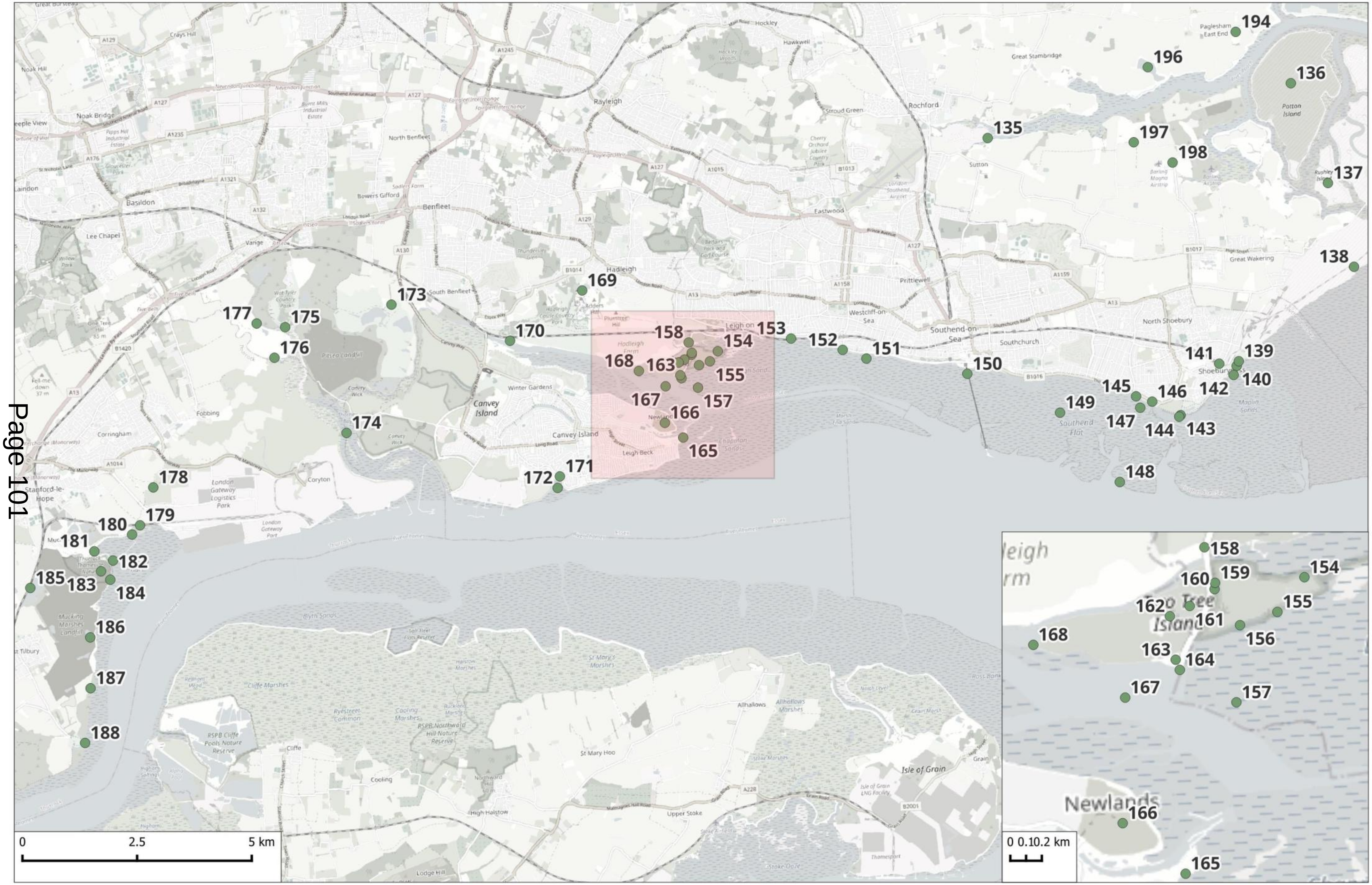
Map 7: Blackwater and Colne Estuaries workshop output



Map 8: Crouch and Roach Estuary & Dengie workshop output (inset refers to red shaded area on main map) - note that point 135 is shown on Map 9 (Benfleet and Southend Marshes, Thames Estuary and Marshes, & Foulness workshop output)



Map 9: Benfleet and Southend Marshes, Thames Estuary and Marshes, & Foulness workshop output (inset refers to red shaded area on main map) - note that point 135 is an output from the Crouch and Roach Estuary & Dengie workshop **APPENDIX 1**



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Appendix 2: Estimates of housing growth potentially requiring mitigation

This appendix provides background on how the figures in Table 5 were derived. Notes on each column are provided after the table.

The basic formula applied for each authority is: (Local Plan Housing Requirement - Sites with PP and Completions) × % in RAMS ZOI

A	B	C	D	E	F	G	H	I
LPA	Stage of Plan Preparation	Plan Period	SM/Published Target per year	Housing Requirement for Plan Period (stated/calculated)	Sites with PP (April 2026)	and completions before 2026	% in RAMS ZOI	Result (E - F - G) * H
Basildon	Reg 18 Local Plan	2023-2043	1,400	28,005	3,342	589	90	21,667
Braintree	Reg 18 Local Plan Review – March 2026	2026-2042	1,115	17,840	5,070	0	90	11,493
Brentwood	Adopted 2022, Call for sites - reg 18 2026	2026-2042	456	7,752	1,632	0	50	3,060
Castle Point	Plan was submitted for Examination in January 2026	2026-2043	701	6,196	739	0	100	5,457
Chelmsford	Reg 19 Local Plan Review, Submission 2026	2022-2041	1,437	24,915	2,510	2650	100	19,755
Colchester	Reg 18 Local Plan Review - December 25	2026-2042	1,300	20,800	4,365	0	100	16,435
Maldon	Exploring options to transition into the new plan-making system in 2026	2023-2043	583	11,660	1,736	403	100	9,521
Rochford	Reg 18 consultation February – March 2026	2023/24 - 2042/43	689	14,469	2,013	0	100	12,456
Southend	Preferred Approach Consultation 2025, reg 18 summer 2025	2025-2050	1,181	29,525	4,081	0	100	25,444
Tendring	Reg 18 Preferred Options consultation	2025 – 2042	1,063	18,071	4,541	679	100	12,851
Thurrock	Local Plan Initial Proposals, reg 19 2026	2024-2044	1,077	21,540	1,200	0	50	10,170
Uttlesford	Full Council in March 2026 to be invited to adopt the Local Plan.	2021-2041	785	13,500	9,247	0	Minimal	0

Notes

B. Stage of Plan Preparation: The further away an LPA is from publishing a Local Plan (Regulation 18 or 19), the less certainty.

C. Plan period: while the plan period ends circa 2041 for most LPAs, there is one exception (Southend) which extends 10 years beyond until 2050.

E: Housing requirement figure (column D): In agreement with Natural England, the preferred approach was sourced from the Local Plan housing target. In some cases, a published figure is not available so a Standard Method calculation (annual SM x 15) is used. The final figure was confirmed with the LPA in most cases, with the exception of Thurrock.

- Additional note: Some LPAs will have published figures which are below SM, this means there could be some additional uncertainty until the Local Plan is examined. Some LPAs have stepped trajectories, meaning that delivery of housing is later in the plan period, for simplicity no adjustment was made to account for this.

F: Sites with planning permission: as of April 2026.

- Additional note: for simplicity no discount is made for lapse rates.

G: Completions that occurred before 2026: This cannot yet be calculated but an adjustment can be made later.

H: RAMS Zone of Influence (ZOI) Adjustment: percentage of the LPA’s area within the RAMS ZOI.

- Student, care homes and specialist housing are accounted for in accordance with the Local Plan for simplicity. It is understood that each LPA will deliver these forms of housing which may attract a discount RAMS rate.

I: Result: Final Calculation

- (Local Plan Housing Requirement - Sites with PP and Completions) × % in RAMS ZOI

- (E - (F + G)) * H
- For Uttlesford, only a tiny area is within the Zone of Influence and no growth is anticipated within this area.

Appendix 3: SAMM costs

The table below summarises the mitigation measures as set out in the strategy and the relevant costs for each. These have been used to calculate the overall cost of mitigation. Costs are estimates only and intended to provide the overall level to set tariff, costs to be reviewed and updated as strategy implemented, and budgets adjusted according to housing growth. Where staff posts are referred to, 'fte' refers to full-time equivalent.

Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
Delivery Manager		£69,800	80	£5,584,000	£48000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc).
Ranger team leaders (2 posts)		£104,500	80	£8,360,000	2 fte posts, each with £35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, personal equipment etc).
Rangers (6 full-time, 3 seasonal)		£341,250	80	£27,300,000	7.5 fte, each with £30000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, personal equipment etc).
Vehicles and other resources for rangers		£55,000	80	£4,400,000	4 vehicles, costed at: £450 per month to lease per vehicle, £1500 for livery, £2000 p.a. insurance, 15000 miles p.a. at 0.25p per mile running costs/charging. £2000 annual budget for team equipment. Rounded up to £55,000 to cover sundries (including parking charges) and personal mileage (some of which will still be required).
Dog project staffing costs		£52,250	80	£4,180,000	£35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc). Costed in-perpetuity
Dog project resources		£8,000	80	£640,000	Travel costs at 5000 miles p.a. and 0.45p per mile. Assumes use of own vehicle or wider project vehicles. Additional costs of £5000 to cover resources and equipment. Rounded up to cover sundry expenses, parking etc.
Communications Officer staffing costs		£31,350	80	£2,508,000	£35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc). Costed in-perpetuity, part time (0.6 fte).
Comms costs		£11,000	80	£880,000	Costs provide budget for printing, design, image sourcing, events etc as required.
Production of monitoring strategy & monitoring support	£17,500			£17,500	Initial budget to cover commission of a monitoring strategy and support to ranger team and delivery officer to ensure robust monitoring protocol and recording forms
Monitoring and data staffing costs		£28,625	80	£2,290,000	£35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc). Part time (0.5 fte). Costed in-perpetuity

Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
Monitoring resources		£15,000	80	£1,200,000	Indicative budget providing resources for purchasing and replacing equipment and commissioning surveys. Costs likely to vary between years and will be set out in monitoring strategy
Visitor survey		£35,000	16	£560,000	Cost allows for 16 repeat surveys - potentially one survey every 5 years for 80 years.
Education/community engagement officer		£52,250	80	£4,180,000	£35000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs (training, equipment etc). Costed in-perpetuity
Resources for schools and events		£6,000	80	£480,000	Indicative budget providing resources to get material printed, develop school packs, teaching resources etc. Budget small but should be possible to work with other mitigation projects to borrow content, ideas and material etc
Engagement material for holiday parks etc.	£15,000			£15,000	One off cost to cover bringing in specialist help to contact parks and develop material. Delivery and further work as necessary by comms post.
Site specific projects		£125,000	80	£10,000,000	There are 9 SPA/Ramsar sites and the budget therefore provides around £13,888 per annum per site. This is an indicative sum intended as a guide only, potentially sufficient to fund 1-3 small projects at each site. No requirement to ensure projects at each site each year and scope to deliver larger one-off projects at a single location if substantial mitigation benefit. Annual budget with scope for amount to flex between years depending on housing delivery and available funds. Projects such as creating new routes/paths or changes to car parks likely to be one-off and simply require money in a single year. 80 year time period provides scope for scattering of small projects around coast in a given year.

APPENDIX 2

Pay Policy Statement 2026/27

MALDON

DISTRICT COUNCIL

Document Control Sheet

Document title	Pay Policy Statement
Summary of purpose	Compliance with Localism Act
Prepared by	Resources Specialist Services Manager
Status	Final
Version number	14
Approved by	Strategy and Resources (S&R) Committee 13.04.25 & Council 03.04.25 Amended by delegated authority 13.10.25 S&R Committee & Council 2026.
Approval date	03 April 2025 (Council) Reviewed May 2024 in line with restructure at Tier 1. Approved Council 29 May 2024. Updated Feb 25 to align pay award 24/25, Salary Sacrifice added, structural updates, inclusion of how pay is calculated, pay ratio, market supplements, overtime and irregular hours in line with WTD (01.01.24 Amendment), removal of SCP P from NJC Payline. Reviewed August 2025 amended the new Payline in line with NJC and JNC pay award. Reviewed October 2025 in line with Transforming Together Phase 1 Senior Leadership Team changes. Reviewed April 2026
Date of implementation	3 April 2026
Review frequency	Annual (or as necessary before then)
Next review date	To apply agreed NJC and JNC pay awards during 26/27 And 01 April 2027 (annually)
Circulation	All staff & Members
Published on the Council's website	Yes

Validity Statement

This document is due for review by the date shown above, after which it may become invalid.

Pay Policy Statement

Introduction

This Statement has been written to meet the statutory requirements of the Localism Act 2011 (the Act), Chapter 8 (Pay Accountability) Section 18 (1) and to aid transparency in respect of Maldon District Council's policy regarding pay to all staff.

The Council seeks to be able to recruit and retain employees in a way which is competitive and fair.

1. General policy

1.1 For the purpose of this policy a chief officer and non-statutory chief officer under section 2 of the Local Government and Housing Act, 1989 includes the Chief Executive as Head of Paid Service and Directors on the Council's Senior Leadership Team.

1.2 The Chief Executive is responsible for the overall management of the Council and its resources. They have delegated authority to determine pay for all employees of the Council.

1.3 The appointment and dismissal of the Chief Executive and Statutory Officers, and appointment of Directors are determined under the Officer Employment and Disciplinary Procedure Rules. The Chief Executive leads on the development and the implementation of the Council's strategies and sets the framework for community engagement.

1.4 The Council's pay policy statement is underpinned by the principle of equal pay and recognises equal pay between both female and male officers as a legal right under employment law and ensures fair and non-discriminatory remuneration package across the authority.

2. Determination of Job Grades

2.1 Maldon District Council has adopted the "Hay Job Evaluation Scheme" which systematically establishes the relative values of different jobs. The Scheme has been used to determine the grades of all existing posts and for new posts as they arise. It is the only mechanism within the Council for determining the grading of posts. Responsibility for administering and coordinating the Job Evaluation Scheme rests with Human Resources (HR).

2.2 A job can only be considered for re-evaluation where there has been a significant change to the responsibilities and accountabilities of the post and where the post holder and the Manager agree a need for a review. The Manager will need to advise where the changes have come from as another post may be affected resulting in a decrease in the applicable grade of that post. If this results in an increase in grade, this will become effective from the date of the job evaluation panel was held. If this results in a decrease, pay protection will apply.

2.3 All roles in the Council are job evaluated and place all roles within a single unified pay scale approved by the Council. Any appointment outside of this Policy, for reason of market forces for instance where there are recruitment challenges, would be agreed by Strategy and Resources Committee.

2.4 The Job Evaluation process was designed to achieve compliance with Equal Pay legislation and to standardise the contractual terms and conditions of staff. Remuneration of all Council employees is governed by agreed policy and procedures.

2.5 The Council's pay policy statement and its principles are applied consistently to all employees. For part-time employees, salary entitlement and the Council's conditions of service are applied pro-rata to comparable full-time employees.

2.6 Temporary employees' salary entitlement and the Council's conditions of service will be applied on the basis of an equivalent to that of permanent employees.

3. Policy on Payments

3.1 Chief Officers

3.1.1 The Local Government and Housing Act, 1989 defines Chief Officers as the following statutory roles (the post titles in brackets identify the relevant posts within the council's senior management structure):

- The Head of Paid Service (Chief Executive)
- Chief Financial Officer Section 151 (Director of Finance S151)
- The Monitoring Officer (Director of Legal and Governance)

3.1.2 The Council defines other posts Chief Officers in non-statutory roles:

- Director of Neighbourhood Services and Communities
- Director of Place, Planning and Growth
- Director of Strategy and Improvement

3.2 Pay and its calculation

3.2.1 The Council's pay scales range from C9-P64. Each grade within the spinal column point consists of four spinal points.

3.2.2 To calculate hours pay, the employees' annual salary is divided by 365 (days), multiplied by 7 (days), divided by the number of hours worked.

3.2.3 For employees working less than 37 hours or those on average pay, the actual hours worked are divided by 37 (hours) then multiplied by the annual salary which gives the pro rata rate.

3.2.4 The pay line for Directors is subject to the same factors as the rest of staff pay, for example any annual pay award granted and aligns to the National Joint Council (NJC).

3.2.5 Any exception to this, such as a proposal to change the pay of senior staff out of line with normal pay awards would be subject to a report to the Council and approval being given.

3.2.6 The Chief Executive and Directors have delegated powers to award discretionary points on an officer's salary scale within approved budgetary limits where they deem it to be in the interests of the Authority. This only applies to points up to the maximum of the salary band for that post.

3.2.7 New entrants will normally be placed at the bottom of the scale unless in exceptional circumstances it can be demonstrated that they have had experience in the same role with the same level of responsibility in another organisation with the capability to work and function at a high level from the outset. Other considerations to merit an appointment at a higher scale point are when a case is made to establish demonstrable previous skills and experience against proven organisational need. These will need to be agreed by HR in consultation with the appropriate manager above Head of Service. In the case of a Chief Executive appointment this will be confirmed by recommendation to the Council through the Appointments Board. The Section 151 and Monitoring Officer will be confirmed by the Appointments Board however pay will be determined by the Chief Executive.

3.3 <u>Performance related pay and bonuses</u>

3.3.1 Maldon District Council does not have performance related pay or bonus payments for any post. As there is no mechanism for linking pay and performance in this way 'earn back' arrangements are not appropriate.

3.4 <u>Progression through the Pay Spine</u>

3.4.1 New staff receive an increment after successful completion of their six-month probationary period. Internal movers may receive an increment at the six months anniversary under our performance management scheme. Those appointed at the top of the scale point in their grade will not achieve any movement.

3.4.2 Those at Director level will have their performance reviewed annually by the Chief Executive.

3.4.4 The Leader and the Deputy Leader of the Council will be responsible for reviewing the Chief Executive's performance.

3.4.5 Incremental increases are not paid if the individual is already at the top of their pay band, or, if they have received an incremental rise within the previous six months.

3.5 Fees, allowances, benefits in kind and expenses

3.5.1 The Chief Executive is also the Returning Officer for the District, meaning that the post holder has specific responsibilities in respect of all elections and national referenda held in the District. These duties attract fees that are variable depending on the election. For Parliamentary, Police, Fire and Crime Commissioner, European elections and national referenda these are set by the Government, for County elections by Essex County Council and for District and Parish elections these are set locally. The Chief Executive may delegate the Returning Officer duties to the Director of Legal and Governance and in doing so, delegates the allowance also.

3.5.2 Apart from these fees, allowances, benefits in kind or expenses are available to all staff and on the same basis. During the course of elections, support from employees may be requested, in such cases, the fee payable will be agreed by the Head of Elections in consultation with the Returning Officer, outside of usual pay policies.

3.5.3 Staff appointed as Deputy Returning Officer's by the Returning Officer can receive a proportion of the above fees dependent upon the responsibilities undertaken at each separate election, as determined by the Chief Executive as Head of Paid Service.

3.6 Pension

3.6.1 All staff are eligible to join the Local Government Pension Scheme (LGPS) in accordance with the terms of that scheme. No special considerations apply to the posts listed in 2.1.

3.6.2 The employee contribution rates for members of the LGPS are reviewed on 01 April each year. The rates as effective from 01 April 2026 are as set out below:

Below are the newly released contribution bands which will be effective from 1 April 2026. These are calculated by increasing the 2025/26 employee contribution bands by the September CPI figure of 3.8% and then rounding down to the nearest £100.

Band	Actual pensionable pay for an employment	Main section contribution rate for that employment	50/50 section contribution rate for that employment
1	up to £18,400	5.50%	2.75%
2	£18,401 to £29,000	5.80%	2.90%
3	£29,001 to £47,300	6.50%	3.25%
4	£47,301 to £59,800	6.80%	3.40%
5	£59,801 to £84,000	8.50%	4.25%
6	£84,001 to £119,100	9.90%	4.95%
7	£119,101 to £140,400	10.50%	5.25%
8	£140,401 to £210,700	11.40%	5.70%
9	£ 210,701 or more	12.50%	6.25%

3.6.3 Every three years an independent actuary calculates how much the Council should contribute to the Scheme. Employer contributions are 21.3% of pensionable gross earnings for 2026/27, 20.0% for 2027/28 and 18.8% for 2028/29.

3.7 Severance payments

3.7.1 Where senior staff leave in the normal course of business (resignation, retirement, etc.) the same procedures would be applied as for any other staff member, and no additional payments would arise as a result.

3.7.2 Should a staff member leave as a result of a settlement agreement these, by their nature, are subject to negotiation with the individual and their representatives and so are variable in their terms. Such agreements are formal legal arrangements and confidentiality binding on both parties is a key component, so any payment arising from such an agreement would not be published. Authorisation of the payment would be in accordance with the Statutory Guidance on the Making and Disclosure of Special Severance Payments, the Council's Terms of Reference and Scheme of Delegation and it would need to represent value for money for the taxpayer in the circumstances.

3.7.3 Senior staff that were previously employed by the Authority and left with a severance or redundancy payment may be re-employed on a consultancy basis to cover short term staff pressures where it is considered appropriate and in the public interest to do so.

3.7.4 For the purposes of continuous service, employees with multiple roles may have different continuous service dates which reflect the start date within the role. The role being made redundant will be calculated on the correct continuous service date.

3.8 Additional Payments

3.8.1 When recruiting to a senior post the salary offered would be that applicable to the grade of the post, as determined by Job Evaluation, and within the established pay line. No additional payments would arise, unless a market supplement to enable recruitment was considered justified due to a recognised technical skill shortage in the job market. See also Market and Retention Supplements.

3.8.2 Employees with multiple jobs within the Council, as per HM Revenues and Customs (HMRC) guidelines, have their National Insurance (NI) liability amalgamated to reflect the correct deduction.

3.9 Statutory roles

3.9.1 The Monitoring Officer, Section 151 Officer and Head of Paid Service are not subject to any additional payment. The statutory nature of the roles are considered as part of the substantive role; these are aligned to when being considered under the Hay Job Evaluation Scheme.

3.10 Publication of remuneration of senior staff

3.10.1 This Pay Policy Statement, once approved by the Council, will be published on the Council's website.

3.10.2 The remuneration and pension contributions of senior staff whose remuneration and pension contributions are £50,000 and over are published annually in the Financial Statements of the Authority. These are placed on the Council's website.

4. Lowest paid staff and The Real Living Wage

4.1 Definition

4.1.1 Maldon District Council is committed to paying The Real Living Wage which is a voluntary rate of pay to apply. When The Real Living Wage increase is announced each year, it is requested that the increase is applied within 6 months. Therefore, it is commonplace to apply any inflated rate to employees pay the first date of the following month. Staff in Pay Bands up to the hourly rate of pay of The Real Living Wage are paid a supplement to bring their hourly rate of pay up to that of The Real Living Wage rate. The increased rate of £13.45 per hour was paid to employees from 01 November 2025.

4.2 Pay Policy in respect of lowest paid staff

4.2.1 All staff up to Chief Executive are subject to identical terms and conditions, procedures and policies as all other staff. In some cases, these policies give slightly different benefits to different levels of staff. For example, the lowest pay bands to the top of E benefit from enhanced pay rates for overtime. No enhancement above grade E is paid. In contrast the basic amount of annual leave increases with grade bands.

4.2.2 The Council employs Apprentices, but these are not included within the definition of 'lowest paid employees' and are not subject to The Real Living Wage rate as they are paid the legal pay rate for Apprentices.

4.2.3 In line with the LGPS Pay Award 25-26, the lower pay bands A-B have been removed from the Council's pay scales for 26-27. All staff on bands A-B will automatically be placed at band C. The Real Living Wage applies up to the hourly rate of pay that aligns.

5. Pay Ratio's

5.1 The Pay Multiple is the ratio between the highest taxable earnings and the median earnings figure for the whole authority in accordance with the Transparency Code 2014.

5.2 Publishing the ratio of pay of an organisation's top earner to that of its median earner has been recommended to support the principles of Fair Pay (Will Hutton 2011). Maldon District Council, as at the end of Quarter 4 (March 2026), has a pay ratio of 1:4.4 between the Chief Executive's salary and the median earnings of all employees. This represents the relationship between the highest and median levels of pay across the organisation. The Council's pay ratio remains proportionate for an organisation of this size.

6. Pay Award / Negotiation

6.1 The NJC for local government services ('Green Book') negotiates pay on behalf for Local Authority staff. Maldon District Council is committed to paying its employees the nationally agreed pay award each year. The award for 2025/26 was aligned to the Council's own pay scale as below;

- Spinal Column Point (SCP) A1 - N56: Increase of 3.2%, pro rata (NJC)
- SCP O57 - P64: Increase of 3.2%, pro rata Joint Negotiating Committee (JNC)

6.2 Apprentice pay rates fall in line with the Apprenticeship rate of pay as set by the government.

6.3 Pay for the Chief Executive is paid at SCP P which is subject to pay awards as negotiated by the JNC for Chief Officers of Local Authorities. The pay negotiations for 2025-26 awarded 3.2% uplift. The pay award for 26/27 is still in negotiation nationally, this Policy will be updated when it is agreed.

6.4 Employees who have left the Council's employment prior to their pay award being implemented may submit a written request for payment of monies owing to them. Any monies due to that employee from 01 April to the last date of their employment will be paid.

6.5 Any agreed increase is published as soon as the agreed increase is known. This will usually be backdated to 01 April where this is agreed part way through a year OR as determined by the NJC / JNC negotiations. Payment to staff is managed as soon as is reasonably practical but usually uplifted the following month and any back payment made the next.

6.6 The Council does not employ any staff under the JNC for local authority Craftworkers ('Red Book').

7 Other pay

7.1 <u>Market and Retention Supplements</u>

7.1.1 There may be occasions when the evaluated salary for a post fails to attract any suitable candidates and consideration is given to increasing the salary by way of a market supplement. They may also be payable to maintain a skilled and experienced workforce. Managers will need to have tried to recruit at the evaluated level and provide HR with salary details of similar jobs within the market.

7.1.2 Supplements will be benchmarked against the salaries for similar jobs annually to ensure they are still required. This will be undertaken by the line manager in conjunction with HR. Should this research result in the market supplement no longer being required, there will be a three month pay protection before withdrawal of the supplement. Directors will then approve these at Senior Management Team level.

7.1.3 Pay for Supplements will be capped at a maximum of 15% of the pro rata salary. These are also subject to pay award increases and are reviewed on an annual basis.

7.1.4 Market and Retention supplements are time-limited and subject to annual review. They are identified separately from basic salary in all documentation and records, including pay slips. Market supplement payments will be subject to the following criteria;

- Subject to tax and national insurance contributions
- Paid pro-rata to part time employees
- Included in statutory calculations for the purposes of sick pay, redundancy pay, annual leave, maternity, adoption, paternity, parental bereavement leave, neonatal care leave, shared parental leave
- Included in overtime
- Increased in line with pay awards

7.2 <u>Honorarium payments</u>

7.2.1 This may be awarded in recognition of an employee taking on a special project or role for a limited time. This is capped at £500.

7.3 <u>Additional Responsibility Allowances (ARA) payments</u>

7.3.1 This may be awarded where an employee is covering part of the duties of a post at a higher level due to absence of a more senior member of staff (e.g. sickness or secondment) – for 4 weeks' or more. Payment is capped at a maximum of two spinal column points above the employees' substantive rate of pay.

7.4 <u>First aid allowance</u>

7.4.1 Employees that are designated first aiders will be paid a flat fee of £6 per month. Employees that are required for the purposes of their job to be first aid qualified will not receive the first aid allowance.

7.5 Events

7.5.1 From time to time, the Council may seek support on a corporate basis for employees to put themselves forward to work on a special event outside of their normal contract of employment. Employees will be paid the event rate. Events worked on will be within the district and/or that which the Council supports. A flat fee of £17.50 per hour will be payable regardless of the day and/or time of the week.

7.6 ICT Out of hours Payments

7.6.1 Disturbance payments of £166.67 per month are payable to identified individuals as a fee for working unsocial hours as and when required to meet with business needs.

7.7 Duty Rota Out of Hours (OOH) - Housing

7.7.1 For employees required to be on call for out of hours, specifically relating to homelessness response, payments will be made at the set fee of Monday to Friday £12.00 per hour, Saturday, Sunday and Bank holidays £20.00 per hour. Additional payments made per call at the employees SCP.

7.8 Overtime

7.8.1 The Working Time Regulations (WTD) amendment 01 January 2024, introduced ‘rolled up holiday pay’ for workers with irregular hours and part year workers. Where overtime is payable to employees, payment for overtime worked continuously over a 3-month period will receive an automatic uplift of 12.07% to their pay to ensure additional holiday accrual is accounted for and separately identified on the payslip.

7.9 Irregular hour workers

7.9.1 The Council tries to minimise the number of persons engaged on a zero hours ‘irregular worker’ contract. However, where they are engaged, under the WTD, annual leave is accrued based on the number of hours they work. The Council manages this obligation by increasing the rate of pay by 12.07% and is itemised separately on the payslip.

7.10 Other pay

7.10.1 Information on the Council’s policies on Occupational sick pay and maternity, shared parental leave, paternity and adoption, parental bereavement leave, shared parental and neonatal care leave can be obtained from the Council’s HR Team.

8 Other benefits

8.1 All employees have access to Occupational Health provision and a fully funded Employee Assistance Programme (EAP) which provides access to

Counselling services and 24/7 confidential support for the staff member and their immediate families. This also provides for a wider benefits platform area that offers discounts on a huge variety of shopping platforms.

8.2 Free on-site car parking is available to staff, subject to availability, as well as a flexible working approach, flexi-time scheme and learning and development opportunities.

8.3 Staff are provided with login details to access Kaarp benefits, a free local government benefit site that provides lifestyle voluntary benefits service thought discounts on personal purchases.

8.4 A discount is offered to staff for local gym membership.

8.5 The Council offers a salary sacrifice scheme to employees through both a car scheme and cycle-to-work. Both initiatives provide staff by making agreed deductions from salary before tax, NI and pension (if applicable) deductions are made.

8.6 The LGPS has a provision within its regulations to allow an employer to contribute to an employee's Additional Voluntary Contribution (AVC) arrangement. This is known as a "Shared cost" AVC which would be administered through a salary Sacrifice.

8.7 Any deduction through a Salary Sacrifice Scheme at the Council will not affect any redundancy calculation by any detrimental effect. Should an individual lose their post through a reorganisation resulting in redundancy, it is proposed that 3 months' notice will be given as part of the Consultation process, to ensure they can withdrawal from the salary sacrifice scheme so as it does not have a detrimental impact on any severance payment.

8.8 The Essex Pension Fund has confirmed that the salary sacrifice shared cost AVC does not have any impact on provisions for ill-health retirement or death in service.

9 Reimbursement of expenditure

9.1 All employees are required to make the best use of council resources and are obliged to consider the most cost-effective option when incurring any expenditure in the course of their duties.

9.2 Subsistence allowances are payable when employees incur additional expenditure on meals because they have been unable to follow their normal meal arrangements whilst out on business.

9.3 Examples of where an employee may need to incur expenditure on meals are as follows:

- Attendance at training courses or seminars where meals or refreshments aren't provided

- Site visits
- Meetings at other organisations
- Travelling to locations as part of official duties

9.4 Subsistence amounts are stated in the Council's Mileage and Expenses Policy.

10 Pensions

10.1 The Council's pension scheme is administered by Essex County Council. General details of the LGPS are available from HR. Both the employee joining the scheme, and the Council contributes to the scheme.

10.2 The rules under which auto-enrolment operates will continue to apply to all Council employees. Eligible staff will be automatically enrolled unless they choose to opt out. This exercise will be repeated every three years on the anniversary of each eligible employee's enrolment.

11 Conclusion

11.1 The Localism Act 2011 requires relevant authorities in England and Wales to prepare a Pay Policy Statement for each subsequent financial year. This paper sets out the Council's policy statement on pay for employees. The next statement will be reported to the Council for its approval next year.

11.2. Should there be a need to amend the existing Pay Policy Statement during the course of the year that is outside of delegate authority, an appropriate recommendation will be made to the Council.

Salary Bands 2025-26

Living Wage £13.45

Pay Scales Subject to NJC 01st April 2025							
Grade		**SCP**	**01 April 2025 Pay**	**Monthly**	**Hourly**	**Time & half**	**Double**
C	C9	9	24648.24	2054.02	12.78	19.17	25.56
	C10	10	25528.65	2127.39	13.23	19.85	26.46
	C11	11	26422.27	2201.86	13.70	20.55	27.40
	C12	12	27408.33	2284.03	14.21	21.32	28.42
D	D13	13	27761.59	2313.47	14.39	21.59	28.78
	D14	14	28590.28	2382.52	14.82	22.23	29.64
	D15	15	29416.78	2451.40	15.25	22.88	30.50
	D16	16	30243.26	2520.27	15.68	23.52	31.36
E	E17	17	30599.83	2549.99	15.86	23.79	31.72
	E18	18	31227.12	2602.26	16.19	24.29	32.38
	E19	19	31859.92	2654.99	16.51	24.77	33.02
	E20	20	32489.41	2707.45	16.84	25.26	33.68
F	F21	21	33081.48	2756.79	17.15		
	F22	22	34026.84	2835.57	17.64		
	F23	23	34973.27	2914.44	18.13		
	F24	24	35916.42	2993.03	18.62		
G	G25	25	36037.47	3003.12	18.68		
	G26	26	37611.21	3134.27	19.49		
	G27	27	39188.25	3265.69	20.31		
	G28	28	40765.29	3397.11	21.13		
H	H29	29	41946.14	3495.51	21.74		
	H30	30	43719.07	3643.26	22.66		
	H31	31	45490.90	3790.91	23.58		
	H32	32	47266.03	3938.84	24.50		
I	I33	33	47855.90	3987.99	24.80		
	I34	34	49640.15	4136.68	25.73		
	I35	35	51401.76	4283.48	26.64		
	I36	36	53175.80	4431.32	27.56		
J	J37	37	53766.78	4480.56	27.87		
	J38	38	55815.16	4651.26	28.93		
	J39	39	57911.50	4825.96	30.02		
	J40	40	60009.02	5000.75	31.10		
K	K41	41	60637.09	5053.09	31.43		
	K42	42	62944.35	5245.36	32.63		
	K43	43	65251.63	5437.64	33.82		
	K44	44	67558.89	5629.91	35.02		
L	L45	45	68189.33	5682.44	35.34		
	L46	46	70075.92	5839.66	36.32		
	L47	47	71964.84	5997.07	37.30		
	L48	48	73851.43	6154.29	38.28		

Grade		SCP	01 April 2025 Pay	Monthly	Hourly	Time & half	Double
M	M49	49	75111.12	6259.26	38.93		
	M50	50	76787.96	6399.00	39.80		
	M51	51	78465.97	6538.83	40.67		
	M52	52	80145.15	6678.76	41.54		
N	N53	53	88702.78	7391.90	45.98		
	N54	54	91094.42	7591.20	47.22		
	N55	55	93484.87	7790.41	48.46		
	N56	56	95876.51	7989.71	49.70		

Pay Scales subject to JNC chief Officers 01st April 2025

O	O57	57	98,219.76	8,184.98	50.91		
	O58	58	100,621.95	8,385.16	52.16		
	O59	59	103,085.01	8,590.42	53.43		
	O60	60	105,610.11	8,800.84	54.74		
P	P61	61	120,220.03	10,018.34	62.31		
	P62	62	128,283.32	10,690.28	66.49		
	P63	63	136,346.51	11,362.21	70.67		
	P64	64	144,409.80	12,034.15	74.85		

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REPORT of
DIRECTOR OF FINANCE

to
STRATEGY AND RESOURCES COMMITTEE
23 JULY 2026

ANTI-CORRUPTION POLICY SUITE

1. PURPOSE OF THE REPORT

1.1 For Members to consider the following updated Policies, which together form the Anti-Corruption Policy Suite:

- **Anti-Money Laundering Policy** at **APPENDIX A,** which updates and replaces the Council's existing policy.
- **Anti-Bribery and Corruption Policy** at **APPENDIX B,** which updates and replaces the Council's existing policy.
- **Anti-Fraud Policy** at **APPENDIX C,** which updates and replaces the Council's existing policy.
- **Sanctions and Prosecutions Policy** at **APPENDIX D,** which updates and replaces the Council's Benefit Counter Fraud policy.
- **Whistleblowing Policy** at **APPENDIX E,** which replaces the Council's existing policy.

2. RECOMMENDATIONS

That the draft Anti-Corruption Policy Suite, as set out in **APPENDICES 1** - **5** to this report, be agreed.

- Anti-Money Laundering Policy (**APPENDIX A**)
- Anti-Bribery and Corruption Policy (**APPENDIX B**)
- Anti-Fraud Policy (**APPENDIX C**)
- Sanctions and Prosecutions Policy (**APPENDIX D**)
- Whistleblowing Policy (**APPENDIX E**)

3. SUMMARY OF KEY ISSUES

3.1 The Council's anti-bribery, corruption and fraud policies should be reviewed every three years or if legislation changes significantly to ensure that they are current and meet the needs of the Council.

3.2 An Anti-Fraud and Corruption Policy, Anti-Money Laundering Policy and Bribery Act Policy were agreed by the Council's Strategy and Resources Committee on 20 July 2023 (Minute No. 173 refers). A Benefit Counter Fraud policy was approved by the Council's Finance and Corporate Services Committee in 2012. A Whistle blowing . >

3.3 UK Government defines corruption as “Corruption is the abuse of entrusted power for private benefit that usually breaches laws, regulations, standards of integrity and/or standards of professional behaviour.”

3.4 In the past six years there have been no cases of proven fraud although small, unquantified, numbers of potential frauds cases have been investigated during that same period. Policies / procedures ensure that there are robust processes and guidance in place to reduce the risks of corruption and financial fraud to Maldon District Council.

3.5 These are the six principles of adequate procedures:

- **Proportionate Procedures**: Anti-bribery policies should be proportionate to the risks faced and the scale of the business.
- **Top-level Commitment**: Senior management must foster a culture where bribery is unacceptable.
- **Risk Assessment**: Regular assessment of internal and external risks of bribery.
- **Due Diligence**: Conducting due diligence on persons or entities performing services on behalf of the company to mitigate risks.
- **Communication and Training**: Ensuring anti-bribery policies are understood throughout the organisation.
- **Monitoring and Review**: Auditing and reviewing procedures to ensure they are effective and identifying improvements

3.6 The policies being reviewed work alongside IT policies and processes protecting the Council from cyber-attacks, staff policies stating employee and manager obligations and service specific guidance.

3.7 This review was completed by the Head of Revenues and Benefits, the Director of Finance (Section 151 Officer) and the Director of Legal and Governance (Monitoring Officer) with advice / support from other Local Authorities including future Mid Essex partners*, and the Council’s Senior Leadership Team (SLT) and Senior Management Team (SMT) reviewed the draft policies.

4. CONCLUSION

4.1 To ensure that Anti-fraud and corruption arrangements are appropriately reviewed and approved for use the Committee is asked to approve the attached policies.

5. IMPACT ON PRIORITIES AS SET OUT IN THE CORPORATE PLAN 2025 - 2028

5.1 **Delivering good quality services**

5.1.1 Ensuring systems and processes are in place to prevent and combat fraud enable the effective delivery of services.

6. IMPLICATIONS

(i) **Impact on Customers** – Safeguarding Council finances, identifying and dealing with fraudulent activities.

(ii) **Impact on Equalities** – None.

(iii) **Impact on Risk (including Fraud implications)** – Reduces and provides a framework for prevention and management of fraud risk.

(iv) **Impact on Resources (financial)** – Having a policy suite designed to minimise risks protects public finance.

(v) **Impact on Resources (human)** – Activities are managed within existing resource.

(vi) **Impact on Devolution / Local Government Reorganisation** – Policies will be aligned in due course.

Background Papers:

UK Anti-Corruption Strategy 2025

Economic Crime and Corporate Transparency Act 2023

Enquiries to: Michelle Lamarre, Head of Revenues and Benefits

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DRAFT

Anti-Money Laundering Policy

MALDON
DISTRICT COUNCIL

Document Control Sheet

Document title	Anti-Money Laundering Policy
Summary of purpose	To assist in the detection, prevention, and management of money laundering
Prepared by	Michelle Lamarre
Status	Draft
Version number	2
To be approved by	Strategy and Resources Committee
Approval date	23 July 2026
Date of implementation	23 July 2026
Review frequency	3 yearly or legislation changes
Next review date	July 2029
Circulation	All staff and Members
Published on the Council's website	No

Validity Statement

Users of the Policy and Procedure should ensure that they are consulting the currently valid version of the document.

Anti-Money Laundering Policy

Introduction

The Proceeds of Crime Act 2002, the Terrorism Act 2000 and Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 place obligations on the Council and its employees to establish internal procedures to prevent the use of their services for money laundering and the prevention of terrorist financing. The Council must also appoint a Money Laundering Reporting Officer (MLRO) to receive disclosures from employees of money laundering activity.

Local authorities are NOT directly covered by these requirements at all (because it is not a regulated industry) but should comply with the underlying spirit of the regulations / legislation (CIPFA guidance). We are committed to *robust arrangements* to identify and prevent any attempts to use the authority to launder money.

What is Money Laundering?

Money laundering describes offences involving the integration of the proceeds of crime, or terrorist funds, into the mainstream economy. Such offences are defined under the Proceeds of Crime Act 2002 (POCA) as the following 'prohibited acts':

a) Concealing, disguising, converting, transferring, or removing criminal property from the UK. (s327 POCA).

b) Becoming involved in an arrangement which an individual knows or suspects, facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person. (s328 POCA).

c) Acquiring, using, or possessing criminal property (s329 POCA). Anti-Money Laundering Policy 3 of 10 V2.0–March 2025.

d) Doing something that might prejudice an investigation e.g., falsifying a document (s333 POCA).

e) Failure to disclose one of the offences listed in a) to c) above, where there are reasonable grounds for knowledge or suspicion (s330-332 POCA); and

f) Tipping off a person(s) who is or is suspected of being involved in money laundering in such a way as to reduce the likelihood of or prejudice an investigation. (s333 POCA).

Provided the council does not undertake activities regulated under the Financial Services and Markets Act 2000, the offences of 'failure to disclose' and 'tipping off' do not apply.

However, the council and its employees and Members remain subject to the remainder of the offences and the full provisions of the Terrorism Act 2000. The Terrorism Act 2000 made it an offence of money laundering to become concerned in an arrangement relating to the retention or control of property likely to be used for the purposes of terrorism or resulting from acts of terrorism.

Although the term ‘money laundering’ is generally used to describe the activities of organised crime, for most people it will involve a suspicion that someone they know, or know of, is benefiting financially from dishonest activities. Potentially very heavy penalties (unlimited fines and imprisonment up to fourteen years) can be handed down to those who are convicted of one of the offences detailed above.

The Council’s Financial Regulations specify appropriate segregation of duties around cash payments and reconciling these.

Scope of the Policy

This policy applies to all persons working for the Council or on our behalf in any capacity, including Members, employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

Failure by any member of staff to comply with these procedures may lead to disciplinary action being taken against them.

Reporting a Concern

The council has designated the Section 151 (S151) Officer as the Money Laundering Reporting Officer (MLRO). The key requirement on employees is to promptly report any suspected money laundering activity to the MLRO.

Reporting to the National Crime Agency

The initial discussion/disclosure will be noted by the MLRO, and they will be required to promptly evaluate this and determine whether it is appropriate to report it to the National Crime Agency (NCA).

If a report is made, then the relevant NCA forms must be completed.

If no report is made, the reason must be recorded.

All disclosure reports referred to and reported to the NCA must be retained in a confidential file for a minimum of five years. The Money Laundering Disclosure Form at Appendix should be used to facilitate the recording of any action taken.

The MLRO or deputy will commit a criminal offence if they know or suspect, or have reasonable grounds to do so, through a disclosure being made to them, that another person is engaged in money laundering and they do not disclose this as soon as practicable to the NCA.

All information obtained for the purposes of money laundering checks and referrals must be kept up-to-date and will be held and processed in compliance with relevant Data Protection legislation.

Staff training and awareness

All staff are required to read this policy which outlines money laundering offences (providing examples) and the protocol for referral.

However, there are some areas of the Council's activities that may be more vulnerable to attempts to launder money. The S151 Officer will assess the risk and where appropriate will source appropriate awareness training.

Internal procedures to help forestall and prevent money laundering

In addition to introducing procedures to address specifically the requirements of the money laundering regulations, there are also robust strategies and procedures in place to fight fraud and corruption that also apply to money laundering.

The regulations require a risk-based approach. Maldon District Council will focus its resources on the areas of greatest risk within each function. This helps a more efficient and effective use of resources proportionate to the risks faced. This also minimises compliance costs and provides a greater flexibility to respond to emerging risks as laundering and terrorist financing methods change.

Maldon District Council will need to consider higher risk transactions based on:

- The origin or destination of the funds,
- Complicated financial or property transactions,
- Transactions that have no apparent economic or legal purpose,
- Where the beneficial owner is a legal person (other than a company listed on a regulated market), trust, company, foundation, or similar legal arrangement;
- Providing assistance in setting up trusts or company structures, which could be used to obscure ownership of property,
- Payments that are made or received from third parties,
- Payments made by cash,
- Transactions with a cross-border element,
- A Politically Exposed Person (see Appendix 2 for definition and further information),

- where false or stolen identification documentation or information has been provided to the Council.

There will be circumstances where simplified due diligence is permitted. After consideration, if the transaction does not fall under the conditions for high risk transaction and the transaction presents a low degree of risk as determined by CCC, a simple customer due diligence is permitted to be undertaken.

Internal audit will monitor compliance by the Authority.

Internal reporting procedures

If you suspect that money laundering activity is taking place (or has taken place), or think that your involvement in a matter may amount to a prohibited act under the legislation, you must disclose this as soon as possible to the MLRO or Deputy.

You should contact the MLRO Officer or Deputy as soon as is practicable – certainly not weeks or months later, or you may become liable to prosecution. Considerations of confidentiality do not apply if money laundering is at issue.

In the first instance, the report may be made informally to allow the MLRO or Deputy to assess the information and decide whether a Suspicious Activity Report (SAR) should be made to the National Crime Agency (NCA). You should include as much detail as possible, for example:

- Details of the people involved – name, date of birth, address, company names, directorships, phone numbers etc;
- Full details of the nature of the involvement;
- The dates of activities;
- Where they took place;
- How they were undertaken;
- Likely amounts of money or assets involved;
- Why you are suspicious.

This will assist the MLRO to make a judgement as to whether there are reasonable grounds for assuming knowledge or suspicion of money laundering. They may initiate an investigation to enable him to decide whether a report should be made to the NCA.

In cases where legal professional privilege may apply, the MLRO/Section 151 Officer must decide (taking legal advice if required) whether there is a reasonable excuse for not reporting the matter.

If a decision is made that a report should be made, the NCA provide forms for completion, to facilitate processing the information. It is recommended that for reasons of confidentiality, Maldon District Council's name should only be included once on the front sheet of the reporting form as the source ID and not anywhere else in the report. It is also recommended that the name or names of those making the report to the MLRO are not included in the report, and that the MLRO / S151 Officer or Deputy is given as contact for queries.

Once the matter has been reported to the MLRO / S151 Officer or Deputy, you must follow any directions they may give you. ***You must not make any further enquiries into the matter yourself***. Any investigations will be undertaken by the NCA.

If you are still involved with the situation that has given rise to suspicions of money laundering, you must not take any further action ***that might constitute a money laundering offence*** unless permission is given by the NCA to continue with the process. In these circumstances, permission should be sought from NCA when the report is made to continue with the process that may involve money laundering. Permission will be given (or withheld) within 7 working days and this may mean that work for a client has to stop until and unless consent is given.

However, there is no automatic need to stop work for a client when a report has been made, unless the business would commit to one of the main money laundering offences by continuing its work for the client.

Care should be taken that the client who is suspected of money laundering is not alerted that a report has been made to the NCA. 'Tipping off' is a specific offence under the POCA, covering situations where disclosures are made following a report to NCA that may prejudice an investigation.

If the NCA has any queries on the report, responses to those queries should be routed via the MLRO to ensure that any reply is covered by appropriate protection against claims for breaches of confidentiality.

You should not make any reference on a client file to a report having been made to the MLRO – the client might exercise their right to see the file, and such a note would tip them off to a report having been made and might make you liable to prosecution.

Appendix 1

Confidential Report to Money Laundering Reporting Officer THIS REPORT TO BE RETAINED FOR AT LEAST FIVE YEARS	
Staff member's name	
Title / Department	
Phone	
Email	
Details of Suspected Offence	
Names and addressed of the persons involved (if a company, nature of business)	
Nature, value, timing of activity	
Nature of suspicions	
Has any investigation been undertaken?	
Have you discussed your suspicions with someone else?	
Have you consulted any supervisory body e.g. The Law Society	
Do you have any good reason not to disclose the matter to the NCA?	
Signed and dated	
For Completion by the MLRO	
Date received	
Date acknowledged	
Unique case reference no.	
Are their reasonable grounds for suspecting money laundering?	
If yes, confirm date of report to NCA?	
Date consent given to employee for transaction to proceed	
Categories	1. Debt/charge 2. Overpayment 3. Refund 4. Cashier error 5. Land/building resale within 3-12 months 6. House or Asset resale within 3 months
Signed and dated	

Appendix 2

Politically Exposed Person ("PEP")

In considering higher risk transactions, one of the criterions the Council has to consider is whether the transaction(s) relate to Politically Exposed Persons (PEP).

Set out below is the definition of a PEP.

A PEP under the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 now extends to persons who fall under the definition of 'Politically Exposed Persons' in the UK, as well as abroad.

A politically exposed person is considered any individual who is entrusted with prominent public functions (as set out in Regulation 35(12) of the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017

including:

- A foreign person who has held any time in the preceding year a prominent public function outside the United Kingdom, in a state or international institution
- Members of courts of auditors or of the boards of central banks
- Ambassadors, chargés d'affaires and high-ranking officers in the armed forces
- Members of the administrative, management or supervisory bodies of state-owned enterprises
- Heads of state, heads of government, ministers and deputy or assistant ministers
- Members of parliaments or of similar legislative bodies
- Members of the governing bodies of political parties
- Members of supreme courts, constitutional courts or of other high-level judicial bodies the decisions of which are not subject to further appeal except in exceptional circumstances
- Member of the administrative, management or supervisory bodies of state-owned enterprises
- directors, deputy directors and members of the board or equivalent function of an international organisation

The definition explicitly excludes middle-ranking or more junior officials.

PEP status also extends to relatives and close associates.

Relatives are set out in the Regulations as a spouse or civil partner of the PEP; children of the PEP and the spouses or civil partners of the PEP's children; and parents of the PEP.

Close associates include any individual who is known to have joint beneficial ownership of a legal entity or legal arrangement, or any other close business relations. It also includes any individual who has sole beneficial ownership of a legal entity or legal arrangement which is known to have been set up for the benefit of a person referred to in regulation.

The Council will take a risk sensitive approach to identifying PEPs. It will undertake a risk assessment with regards to each individual PEP on a case by case basis.

DRAFT

Anti-Corruption and Bribery Policy

MALDON

DISTRICT COUNCIL

Document Control Sheet

Document title	Anti-Corruption and Bribery Policy
Summary of purpose	To assist in the detection, prevention, and management of incidents of bribery and corruption.
Prepared by	Michelle Lamarre
Status	Draft
Version number	2
To be approved by	Strategy and Resources Committee
Approval date	23 July 2026
Date of implementation	23 July 2026
Review frequency	3 yearly or legislation changes
Next review date	July 2029
Circulation	All staff and Members
Published on the Council's website	No

Validity Statement

Users of the Policy and Procedure should ensure that they are consulting the currently valid version of the document.

MALDON
DISTRICT COUNCIL

Maldon District Council – Anti-corruption and bribery policy

1 Introduction

1.1 Maldon District Council (the "Council") is committed to protecting the public purse and the services it provides from being abused. We conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.

1.2 We take our legal responsibilities very seriously. We will uphold all laws relevant to countering bribery and corruption. However, we remain bound by UK laws, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

2 Purpose

2.1 The aim of this policy is to:

- set out the Council's approach to minimising the risk of bribery and corruption occurring, detecting its possible occurrence, and the actions it will take when corrupt or fraudulent activity is suspected and identified.

- provide information and guidance to those working for and on our behalf on how to recognise and deal with bribery and corruption issues.

2.2 It is underpinned by all other relevant policies/obligations as an employer and related policies including:

- Anti-Fraud and Corruption Policy
- Fraud Response Plan
- Anit Money Laundering Policy
- Whistleblowing Policy
- Member and Officers Code of Conduct
- Maldon District Council Enforcement Strategy

3 Scope

3.1 This policy applies to all persons working for the Council or on our behalf in any capacity, including Members, employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

3.2 We expect and encourage them to be alert to the possibility of acts of fraud, corruption or bribery and to raise any such concerns at the earliest opportunity.

3.3 Members and Staff have a duty to protect the Councils assets including information as well as property. When an employee suspects that there has been fraud or corruption, thy must report the matter to a member of the Senior Leadership Team (SLT).

3.4 HM Government published the UK Anti-Corruption Strategy in 2025, building on earlier requirements for local authorities in England to adopt a Code of Conduct compliant with the seven 'Nolan' principles of standards of public life; selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

3.5 All local authorities are also required by the Localism Act 2011 to put in place arrangements for investigating allegations that Members have failed to comply with the Member Code. Failure to comply with the code could lead to the Member being censured.

3.6 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Council or under its control. All staff are required to avoid activity that breaches this policy.

4 Roles and responsibilities

4.1 The following table sets out the responsibilities for each stakeholder:

Stakeholder	Responsibilities
The Council	• overall responsibility for the effective operation of this policy • reviewing the effectiveness of actions taken in response to concerns raised under this policy
Elected Members	• facilitate an anti-fraud and anti-corruption culture • demonstrate commitment to this strategy and ensure it has the appropriate profile within the Councils • comply with the Members Code of Conduct • report any genuine concerns accordingly
Performance, Governance and Audit Committee	• monitor and review the effectiveness of the Councils anti-fraud and corruption arrangements • champion strong political and executive support for work to counter fraud and corruption
Chief Financial Officer (Section 151)	• ensure that those working in counter fraud are professionally trained and accredited for their role • ensure that those working to counter fraud and corruption are undertaking this work in accordance with a clear ethical framework and standards of personal conduct • ensure that there is a level of financial investment in counter fraud and corruption work that is proportionate to the risk identified • ensure that there are proper arrangements in place to administer the Council's financial affairs (statutory duty, under Section 151 of the Local Government Act 1972 and Section 73 of the Local Government Act 1985)

Maldon District Council – Anti-corruption and bribery policy

Stakeholder	Responsibilities
Monitoring Officer	• regularly publicise and monitor compliance with expected standards of ethical conduct • ensure registers of interests, gifts and hospitality are maintained • ensure Members and Officers are fully aware of their obligations in relation to honesty and transparency • to put in place arrangements for investigating allegations that Members have failed to comply with the Member Code.
Internal Audit	• report upon any learning points the organisation must implement following am internal fraud event • develop an annual, risk based internal audit plan including consideration of fraud risk • evaluate the potential for the occurrence of fraud and how the organisation manages fraud risk • make recommendations where weaknesses are identified and ensure action plans implemented to prevent reoccurrences
Human Resources	• ensure that there is an effective propriety checking system implemented by appropriately trained staff in place • ensure employment policies support the anti-fraud and anti-corruption strategy • ensure that effective whistleblowing arrangements are established • ensure all employees have read the Employees Code of Conduct and understand their responsibilities as part of the induction process
Senior Leadership Team	• ensure the risks of fraud and corruption are identified and recorded on the corporate fraud risk register as required • implement adequate controls to reduce the risk to an acceptable level • adopt and maintain a robust control environment • ensure the anti-fraud and anti-corruption strategy is implemented within their area of responsibility • ensure that any allegations of fraud that they are aware of are reported • ensure the risk of fraud and corruption is considered in all new processes • establish an anti-fraud culture in their service area(s)
Managers	• ensure all employees are aware of their responsibilities under the anti-fraud and anti-corruption policy • ensure all employees are aware of the process for reporting allegations of fraud • ensure accurate and timely reporting of gifts and hospitality • promote the adoption of policies consistent with the principles set out in this policy within partnerships, joint working and other supplier/contractual arrangements

Maldon District Council – Anti-corruption and bribery policy

Stakeholder	Responsibilities
Employees (including Agency staff)	• comply with the Council's policies and procedures • maintain an awareness of the possibility of fraud and corruption • understand their responsibilities surrounding fraud and report any genuine concerns accordingly • an understanding of expected behaviour

4.2 You are required to avoid activity that breaches this policy. It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;

- give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;

- accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return;

- offer or accept a gift to or from government officials or representatives, or politicians or political parties;

- threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or

- engage in any other activity that might lead to a breach of this policy.

4.3 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Council or under its control.

4.4 You must:

- ensure that you read, understand, and comply with this policy as failure to do so may constitute a breach of the Code of Conduct resulting in further action being taken; and

- raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us or indicates to that a gift or payment is required to secure their business.

4.5 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control.

4.6 It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
- accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return;
- offer or accept a gift to or from government officials or representatives, or politicians or political parties, without the prior approval of your Director;
- threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any other activity that might lead to a breach of this policy.

5 Objective of this policy

5.1 This policy provides a coherent and consistent framework to enable you to understand and implement arrangements enabling compliance. In conjunction with related policies and key documents it will also enable you to identify and effectively report a potential breach.

5.2 We require that you:

- act honestly and with integrity always and safeguard the Council's resources for which you are responsible; and
- comply with the spirit, as well as the letter, of the laws and regulations of all jurisdictions in which the Council operates, in respect of the lawful and responsible conduct of activities.

6 The Council's commitment to action

6.1 The Council commits to:

- setting out a clear anti-corruption and bribery policy and keeping it up to date;
- making all Members and employees aware of their responsibilities to adhere strictly to this policy always;
- encouraging its Members and employees to be vigilant and to report any suspicions of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;

- rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in any resultant prosecution;
- taking firm and vigorous action against any individual(s) involved in bribery;
- provide information to all Members and employees to report breaches and suspected breaches of this policy; and
- include appropriate clauses in contracts to prevent bribery.

7 Gifts and hospitality

7.1 This policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:

- establishing or maintaining good business relationships;
- improving or maintaining our image or reputation; or
- marketing or presenting our products and/or services effectively.

7.2 Sample tokens of modest value bearing the name or insignia of the organisation giving them (for example, pens, diaries or calendars) whether given personally, or received in the post, may be retained provided the following requirements are met:

- it is not made as an inducement or reward;
- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it is given in our name, not in your name;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances, taking account of the reason for the gift, its timing and value. For example, in the UK it is customary for small gifts to be given at Christmas;
- it is given openly, not secretly; and
- it complies with any applicable local law.

7.3 Promotional gifts of low value such as branded stationery to or from existing customers, suppliers and business partners will usually be acceptable.

7.4 Reimbursing a third party's expenses or accepting an offer to reimburse our expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.

7.5 We appreciate that practice varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift, hospitality or payment is reasonable and justifiable. The intention behind it should always be considered.

7.6 You should refuse the offer or invitation (or return the gift) unless your Director has advised you that it may be accepted or retained.

8 Record-keeping

8.1 We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

8.2 Members and staff must declare and keep a written record of all hospitality or gifts given or received, which will be subject to managerial review.

8.3 Members and staff must submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

8.4 All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off book" to facilitate or conceal improper payments.

9 Breaches of this policy

9.1 As well as the possibility of civil action and criminal prosecution, staff that breach this policy may face disciplinary action, which could result in summary dismissal for gross misconduct. Dismissal can still be an outcome with or without civil action or criminal prosecution.

9.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

10 Members

10.1 The Member Code of Conduct requires that where a Member acts as a representative of the authority they must not use or attempt to use their position as a Member, improperly to confer on or secure for themselves or any other person, an advantage or disadvantage.

10.2 Allegations against a Member for breach will be routed through the Standards complaints process administered by the Monitoring Officer and Deputy Monitoring Officer.

11 Public contracts and failure to prevent bribery

11.1 Under the Public Contracts Regulations 2015 (which gives effect to EU law in the UK), a company is automatically and perpetually debarred from competing for public contracts where it is convicted of a corruption offence. Organisations that are convicted of failing to prevent bribery are not automatically barred from participating in tenders for public contracts.

11.2 However, the Council has the discretion to exclude organisations convicted of this offence.

12 Raising a concern

12.1 This Council is committed to ensuring that all of us have a safe, reliable, and confidential way of reporting any suspicious activity. Concerns about any issue or suspicion of bribery or corruption should be raised at the earliest stage possible.

12.2 We want you to know how you can raise concerns.

12.3 We all have a responsibility to help detect, prevent and report instances of bribery. Any individual with a concern regarding a suspected instance of bribery or corruption is encouraged to report this immediately to ensure that action can be taken and the matter resolved.

12.4 The disclosure should be made and resolved internally via the reporting tool on Freshservice.

12.5 However, where internal disclosure is not appropriate, the individual can raise concerns with Managers, HR or the S151 Officer or Deputy, the External Auditor or relevant professional bodies or regulatory organisations.

13 Protection

13.1 Concerns can be reported anonymously. If an incident of bribery is reported, we will act as soon as possible to evaluate the situation. We have procedures for investigating fraud, misconduct and non-compliance issues and these will be followed in any investigation of this kind.

13.2 Members and staff who refuse to accept a bribe, or those who raise concerns can understandably be worried about the repercussions. The Council aims to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken.

13.3 The Council is committed to ensuring nobody suffers detrimental treatment through refusing to take part in bribery or corruption, or because of reporting a concern in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. Members and staff who believe that they have suffered any such treatment, should inform the Compliance Manager immediately. If the matter is not remedied, and the individual is an employee, they should raise it formally using our Grievance Procedure, which is available on Freshservice.

14 Potential risk scenarios: 'red flags'

14.1 The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

14.2 If you encounter any of these red flags while working for us, you must report them promptly to your manager:

- you become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
- a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- a third party requests an unexpected additional fee or commission to "facilitate" a service;
- a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- a third party requests that a payment is made to "overlook" potential legal violations;
- a third party requests that you provide employment or some other advantage to a friend or relative;
- you receive an invoice from a third party that appears to be non-standard or customised;
- a third party insists on the use of side letters or refuses to put terms agreed in writing;
- you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;

- a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us; or

- you are offered an unusually generous gift or offered lavish hospitality by a third party.

Appendix 1 -

1 Staff Register of Gifts and Hospitality and Personal Interests in Contracts

1.1 This page relates to the requirements for STAFF to register gifts and hospitality and also personal interests in contracts.

1.2 For more information about member arrangements go **HERE**

1.3 Any gifts and hospitality must be recorded in the Register of Gifts and Hospitality.

1.4 This can be done by raising a Freshservice request by going to https://maldon.freshservice.com/support/solutions/articles/50000034185-staff-register-of-gifts-and-hospitality-and-personal-interests-in-contracts

1.5 You must also register any personal interests that you have that could be linked to activities of the Council (see separate section below).

1.6 Below is an extract from the Code of Conduct for staff to clarify the requirements.

12 Personal interests

12.1 Employees must declare to a Director any financial or non-financial interests or any potential interest in any matter that they consider could be in conflict with the Council's interests. This includes, but is not limited to, planning applications and benefit or other claims which relate to the employee, their friends, relative or acquaintance.

12.2 If in the course of work an employee becomes aware of a potential conflict of interest, such as related to a planning issue or benefits claim by a friend, relative or acquaintance for instance, they must declare it immediately to a Director.

12.3 Employees should declare to a Director membership of any organisation not open to the public without formal membership and commitment of allegiance and which has secrecy about rules or membership or conduct.

12.4 A register of staff interests will be maintained by the Directors and each employee is responsible for making their own entry.

16 Gifts and hospitality

16.1 Employees should comply with the Council's Anti-corruption and bribery policy.

16.2 Employees should only accept offers of hospitality if there is a genuine need to impart information or represent the Council in the community. Offers to attend purely social or sporting functions should be accepted only when these are part of the life of the community or where the Council should be seen to be represented and should be properly authorised in advance of acceptance of any invitation by a Director.

16.3 Employees should not accept significant personal gifts, loans, fees, rewards or advantage from contractors, potential contractors, service users and outside suppliers. All gifts whose value exceeds £25 should be recorded in the gifts and hospitality register and approval from a Director is required to keep the gift. The register is open to inspection by Members of the Council.

16.4 Acceptance by employees of hospitality through attendance at relevant conferences and courses is acceptable where it is clear the hospitality is corporate rather than personal, where the Council is satisfied that any purchasing decisions are not compromised. Where visits to inspect equipment, etc. are required, employees should ensure that the Council meets the cost of such visits to avoid jeopardising the integrity of subsequent purchasing decisions.

1.7 **Register of interest in contracts for staff**

1.7.1 There is also a requirement that there should be a register for any pecuniary interests an officer and Member or their close relatives have in any contract relating to the Council. As soon as you become aware of such an interest, please inform Freshservice with details of the interest using the link below:

Register an interest in a contract

Appendix 2 - Definitions

- **Bribery** is defined as the offering, giving, receiving or soliciting of any financial or other advantage (including money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value) to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage. Within the Bribery Act 2010, it is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine and employers that fail to prevent bribery can face an unlimited fine, exclusion from tendering for public contracts, and damage to its reputation

- **Corruption** is the abuse of entrusted power or position for private gain.

- **Facilitation payments**, also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example, by a government official). They are not common in the UK but are common in some other jurisdictions.

- **Kickbacks** are typically payments made in return for a business favour or advantage.

- **Third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Appendix 3 – Key points of the Bribery Act 2010

There are four key offences under the Act

Section 1, Offence of bribing another person:

This section makes it an offence when a person:

- offers, promises, or gives a financial or other advantage to another person and intends the advantage to induce a person to perform improperly a relevant function or activity; or
- to reward a person for the improper performance of such a function or activity; or
- offers, promises, or gives a financial or other advantage to another person and knows or believes that the acceptance of the advantage would itself constitute the improper performance of a relevant function or activity.

Section 2, Being bribed:

This section makes it an offence when a person:

- Requests, agrees to receive or accepts a financial or other advantage intending that, in consequence, a relevant function or activity should be performed improperly;
- Requests, agrees to receive or accepts a financial or other advantage and the request, agreement or acceptance itself constitutes the improper performance of the person of a relevant function or activity;
- Requests, agrees to receive or accepts a financial or other advantage as a reward for the improper performance of a relevant function or activity; or
- In anticipation of or in consequence of the person requesting, agreeing to receive or accepting a financial or other advantage, a relevant function or activity is performed improperly.

Section 6, Bribery of foreign public officials:

Under this section an offence is committed where a person:

- Intends to influence a foreign official in their official capacity and intends to obtain or retain business or an advantage in the conduct of business; or
- Offers, promises or gives any financial or other advantage to a foreign public official.

Section 7, Failure of commercial organisation to prevent bribery:

A relevant commercial organisation is guilty of an offence:

- If a person associated with the organisation bribes another person intending to obtain or retain business for the organisation or to obtain or retain an advantage in the conduct of business for the organisation and the organisation fails to take reasonable steps to implement adequate procedures to prevent such activity.

Are we a "commercial organisation"?

- The Council is a commercial organisation for the purposes of the Bribery Act 2010.

What are 'adequate procedures'?

- In the first instance it is for each organisation to determine procedures which it considers proportionate. Ultimately, if bribery occurs, a court will decide whether the procedures are adequate.

  In determining procedures, we need to have regard to the following six principles which are set out in guidance produced by the Ministry of Justice:

1. **Proportionate procedures**
   - An organisation's procedures to prevent bribery and corruption by persons associated with it are proportionate to the bribery and corruption risks it faces and to the nature, scale and complexity of the organisation's activities. They are also clear, practical, accessible, effectively implemented and enforced.

2. **Top level commitment**
   - The top-level management (be it a board of directors, the owners or any other equivalent body or person) are committed to preventing bribery by persons associated with it. They foster a culture within the Council in which bribery is never acceptable.

3. **Risk assessment**
   - The Council assesses the nature and extent of its exposure to potential external and internal risks of bribery on its behalf by persons associated with it. The assessment is periodic, informed and documented.

4. **Due diligence**
   - The Council applies due diligence procedures, taking a proportionate and risk-based approach, in respect of persons who perform or will perform services for or on behalf of the Council, in order to mitigate identified bribery risks.

5. Training and Communication

- Training on this policy forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

- Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

6. Monitoring and review

- The Council monitors and reviews procedures designed to prevent bribery by persons associated with it and makes improvements where necessary.

- The Council is committed to proportional implementation of these principles.

DRAFT

Anti-Fraud Strategy

MALDON
DISTRICT COUNCIL

Document title	Anti-Fraud Strategy
Summary of purpose	To assist in the detection, prevention and management of fraud and corruption
Prepared by	Michelle Lamarre
Status	Draft
Version number	2
To be approved by	Strategy and Resources Committee
Approval date	23 July 2026
Date of implementation	23 July 2026
Review frequency	3 yearly
Next review date	July 2029
Circulation	All staff and Members
Published on the Council's website	No

1 Introduction

1.1 The Council has a duty to safeguard public funds and is committed to the highest standards of accountability and openness to ensure that controls are in place to reduce, prevent, detect and prosecute corrupt and fraudulent behaviour.

1.2 This strategy incorporates the best practice guidance for combatting fraud in Local Government including the Governments 2025 UK Anti-Corruption Strategy and the Chartered Institute of Public Finance and Accountancy (CIPFA) Code of Practice. It is based on the Fighting Fraud and Corruption Locally – A strategy for the 2020s (FFCL).

1.3 The Council will adhere to the key principles set out in FFCL as this represents best practice and compliance and will enable the Council to demonstrate its commitment to protecting the public purse.

1.4 It builds on earlier requirements for Local Authorities to adopt a code of conduct compliant with the seven 'Nolan' principles of standards in public life; selflessness, integrity, objectivity, accountability, openness, honesty and leadership .and incorporates the five pillars of activity set out in the FFCL

1.5 This document updates earlier guidance and sets out the Council's approach to minimising the risk of corruption or fraud occurring, to detecting its possible occurrence, and the actions it will take when activity is suspected and/or identified. It is underpinned by all other relevant obligations as an employer and related policies including:

- Anti Bribery and Corruption Policy
- Anit Money Laundering Policy
- Whistleblowing Policy

- Member and Officers Code of Conduct
- Maldon District Council Fraud Response Plan (Appendix 1 of this policy)
- Maldon District Council Enforcement Strategy
- Sanctions and Prosecution Policy

2 Purpose

2.1 The aim of this strategy is to:

- protect the public purse, the Council's residents and the Council's assets and ensure that fraud and corruption within the Council is kept to a minimum.
- set out the Council's approach to managing the risk of fraud, theft and economic crime and the failure to prevent fraud offence
- facilitate, promote and establish an appropriate culture.

2.2 Fraud cannot always be prevented but the Council commits to ensuring that every effort will be made to conduct robust investigations and bring offenders to account.

3 Scope

3.1 This document applies to all areas of the Council's business and to all persons working for the Council or on our behalf in any capacity, including Members, employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

4 Roles and responsibilities

4.1 The following table sets out the responsibilities for each stakeholder:

Stakeholder	Responsibilities
The Council	• overall responsibility for the effective operation of this policy • reviewing the effectiveness of actions taken in response to concerns raised under this policy.
Elected Members	• facilitate an anti-fraud and anti-corruption culture • demonstrate commitment to this strategy and ensure it has the appropriate profile within the Councils • comply with the Members Code of Conduct • report any genuine concerns accordingly
Performance,	• monitor and review the effectiveness of the Councils anti-

Stakeholder	Responsibilities
Governance and Audit Committee	fraud and corruption arrangements • champion strong political and executive support for work to counter fraud and corruption
Chief Financial Officer (Section 151)	• day to day operational responsibility for this Strategy • ensure that those working in counter fraud are professionally trained and accredited for their role • ensure that those working to counter fraud and corruption are undertaking this work in accordance with a clear ethical framework and standards of personal conduct • ensure that there is a level of financial investment in counter fraud and corruption work that is proportionate to the risk identified • ensure that there are proper arrangements in place to administer the Council's financial affairs (statutory duty, under Section 151 of the Local Government Act 1972 and Section 73 of the Local Government Act 1985)
Monitoring Officer	• regularly publicise and monitor compliance with expected standards of ethical conduct • ensure registers of interests, gifts and hospitality are maintained • ensure Members and Officers are fully aware of their obligations in relation to honesty and transparency • to put in place arrangements for investigating allegations that Members have failed to comply with the Member Code.
Internal Audit	• report upon any learning points the organisation must implement following am internal fraud event • develop an annual, risk based internal audit plan including consideration of fraud risk • evaluate the potential for the occurrence of fraud and how the organisation manages fraud risk • make recommendations where weaknesses are identified and ensure action plans implemented to prevent reoccurrences
Human Resources	• ensure that there is an effective propriety checking system implemented by appropriately trained staff in place • ensure employment policies support the anti-fraud and anti-corruption strategy • ensure that effective whistleblowing arrangements are established • ensure all employees have read the Employees Code of Conduct and understand their responsibilities as part of the induction process
Senior Leadership Team	• reviewing this policy • ensure the risks of fraud and corruption are identified and recorded on the corporate fraud risk register as required • implement adequate controls to reduce the risk to an

Stakeholder	Responsibilities
	acceptable level • adopt and maintain a robust control environment • ensure the anti-fraud and anti-corruption strategy is implemented within their area of responsibility • ensure that any allegations of fraud that they are aware of are reported • ensure the risk of fraud and corruption is considered in all new processes • establish an anti-fraud culture in their service area(s)
Managers	• ensure all employees are aware of their responsibilities under the anti-fraud and anti-corruption policy • ensure all employees are aware of the process for reporting allegations of fraud • ensure accurate and timely reporting of gifts and hospitality • promote the adoption of policies consistent with the principles set out in this policy within partnerships, joint working and other supplier/contractual arrangements
Employees (including Agency staff)	• comply with the Councils policies and procedures • maintain an awareness of the possibility of fraud and corruption • understand their responsibilities surrounding fraud and report any genuine concerns accordingly • an understanding of expected behaviour

5 Objective of this Strategy

5.1 This strategy provides a coherent and consistent framework to enable you to recognise, understand, prevent and report fraudulent/corrupt activity and sets out the Council's commitment to actions aligned with the pillars of activity.

6 The Council's commitment to action

Govern

'Having robust arrangements and executive support to ensure anti-fraud, bribery and corruption measures and embedded throughout the organisation'.

The Council is committed to the highest ethical standards. We expect all of our staff, contractors and Members to follow all legal rules, procedures and practices, and to protect the Council's legitimate interests at all times. We commit to the following priorities:

- Review and update the Anti-Fraud Strategy and related policies

- Review and update behavioural policies including Member and Officer Codes of Conduct, Gifts and Hospitality Policy, Declarations of Interest Policy
- Ensure IT security policies and procedures are up to date

6.1 Acknowledge

'Accessing and understanding fraud risks'.
'Committing to the right support and tackling fraud and corruption'.
'Demonstrating that it has a robust anti-fraud response'.
'Communicating the risks to those charged with Governance'.

All organisations are at risk of fraud and corruption. The illegal and hidden nature of fraud makes it hard to measure accurately. Acknowledging this risk is essential in developing an appropriate and effective anti-fraud response. To recognise fraud effectively there must be a thorough understanding of what the fraud issues are, where the risks are likely to occur and the scale of any potential losses.

The Council is working to implement a strong counter fraud response. We commit to the following priorities:

- To identify both fraud risks facing the Councils and the reasonable procedures in place to reduce or remove the risk
- To promote a strong anti-fraud culture and to raise both staff and public awareness
- To deliver fraud awareness training package
- To work with partners and stakeholders to share understanding of emerging fraud risks
- To regularly review emerging fraud risks, mitigation/control measures and the Councils exposure to loss
- To participate in collaborative counter fraud work with other agencies
- To use data matching to identify potential fraud

6.2 Prevent

'Making the best use of technology'
'Enhancing fraud controls and processes'
'Developing a more effective anti-fraud culture'
'Communicating its' activity and successes'

Preventing losses from occurring in the first place is a crucial strand of a robust Anti-Fraud strategy. Preventative measures make offences more difficult to carry out. These preventative measures establish physical, logical and procedural barriers to discourage fraud and corruption by implementing proportionate countermeasures to prevent or reduce fraud risk.

This includes:

- Assessing the system of internal control in preventing and detecting fraud, bribery and corruption
- Effective segregation of duties
- Effective recruitment and selection of employees including robust checks in terms of proprietary and integrity
- Conflicts of interest are flagged via the Declaration of Interests protocol

We commit to the following priorities

- Ensuring that anti-fraud controls are considered when developing new systems and processes
- Making new staff aware of their responsibilities as part of the induction process
- Human Resources and Management to undertake robust due diligence checks in respect of contracts, contractors, agency staff and direct employees
- Implementation of a corporate fraud awareness training package and targeted training aligned to risk
- Managers to ensure that there are robust control measures in place to prevent fraud and corruption
- Work collaboratively with both internal colleagues and partners to help prevent fraud
- Ongoing participation in the National Fraud Initiative data matching exercise
- Promoting a culture of good governance and personal/ethical conduct
- Ensuring that there are effective reporting arrangements
- Encouraging employees and elected Members to raise genuine concerns through the appropriate channels
- Communicate successful outcomes across the organisation to act as a deterrent
- Proactively share fraud alerts, scams and emerging fraud risks with staff

6.3 Pursue

'Prioritising fraud recovery and use of civil sanctions'.
'Developing capability and capacity to punish offenders'.
'Collaborating across geographical areas and sectoral boundaries'.
'Learning lessons and closing the gaps'.

The Council is working to provide a robust fraud response and deter others. It is important in maintaining an anti-fraud culture that all offences are dealt with in a consistent manner.

- Taking robust and appropriate action to investigate, punish and recover funds from those who seek to defraud them
- Seek the strongest available sanctions against any member of the public, contactor, Member or employee who commit fraud. This may include prosecution and additionally, for employees, disciplinary action
- The Council will work with other public authorities, including the Police and The Department for Work and Pensions (DWP)
- Information will be shared to prevent, detect and investigate acts of fraud against the public purse
- The Councils will seek to recover any funds or assets that have been lost, as a result of fraud, utilising the Councils debt recovery procedures
- Reflect on lessons learned where fraud and error have occurred and consider improvements to control measures to reduce the risk of re-occurrence

6.4 Protect

'Recognising the harm that fraud can cause in the community'.
'Protecting itself and its' residents from fraud'.

By adopting the principles of govern, acknowledge, prevent and pursue, the Council can protect itself from fraud and the harm that fraud can cause to both the Council and its residents.

The Council commits to the following priorities:

- Taking robust and appropriate action to investigate, punish and recover funds from those who seek to defraud them
- Seek the strongest available sanctions against any member of the public, contactor, Member or employee who commit fraud. This may include prosecution and additionally, for employees, disciplinary action
- The Council will work with other public authorities, including the Police and DWP

- Information will be shared to prevent, detect and investigate acts of fraud against the public purse
- The Councils will seek to recover any funds or assets that have been lost, as a result of fraud, utilising the Councils debt recovery procedures
- Reflect on lessons learned where fraud and error have occurred and consider improvements to control measures to reduce the risk of re-occurrence

7 Reporting

7.1 The Fraud Response Plan (Appendix 1) defines the way in which the Council applies its various policies and procedures to suspected instances of theft, fraud corruption and bribery both staff and non-staff related.

Appendix 1

Maldon District Council Fraud Response Plan

1. Introduction

1.1 The Fraud Response Plan defines the way in which the Council applies its various policies and procedures to suspected instances of theft, fraud corruption and bribery both staff and non-staff related. It fits in with and is designed to be read in conjunction with the Council's Anti-Fraud and Corruption Strategy and associated documents including:

- Money Laundering Policy
- Anti-Bribery and Corruption Policy
- Whistleblowing / Confidential Reporting Policy
- the Sanctions and Prosecutions Policy and
- the Corporate Enforcement Policy.

1.2 The aim of this plan is to provide clear guidance for dealing with these issues, access to rapid relevant advice and a guide for managers on how to react and deal with suspicions of fraud, theft, corruption and bribery.

1.3 Additionally, it seeks to give a brief outline on how investigations will be progressed (although no detail will be given regarding investigation techniques etc.).

1.4 The Fraud Response Plan is designed to ensure timely and effective action in the event of suspected fraud by:

- Seeking to minimise the extent of the fraud by taking prompt action
- Preventing further losses where fraud had occurred
- Maximising the recovery (or the chances of recovering) any financial losses
- Ensuring the accuracy and integrity of evidence for successful criminal prosecution and / or disciplinary action
- The early identification of any system weaknesses and the lessons to be learnt for preventing them in the future
- Maximising positive publicity where frauds are discovered and dealt with.
- Deterring others from any illegal / inappropriate conduct they may be committing or contemplating.

1.5 Concern of corruption, bribery, theft or fraud can be reported by in person, by telephone, in writing (marked private or confidential) or using the appropriate e-form

2. First Response

2.1 Where managers suspect a staff member of fraud or their involvement in a fraud is taking place, the first course of action **must** be to contact a member of SLT, the Section 151 Officer or Deputy. Although Housing Benefit fraud is investigated by the DWP, where a suspicion occurs of a staff member's involvement in a Housing Benefit (including Local Council Tax Support) fraud, the above steps must still be followed.

2.2 All other suspicions of fraud (including Local Council Tax Support) must be reported to the Section 151 Officer or Deputy. Suspicions involving State Benefits can be reported directly to The Department for Work and Pensions (DWP) via their website (www.gov.uk/report-benefit-fraud) or by calling the National Benefit Fraud Hotline on 0800 854440 or by text phone on 0800 328 0512.

2.3 In usual circumstances, the Section 151 Officer or Deputy will assess the risk and undertake an investigation if appropriate.

2.4 The Section 151 Officer or Deputy retains overall responsibility for the conduct of the investigation; however, it is probable that the matter will be allocated to another senior officer to undertake any investigation. They must be independent of any service area under investigation. Where required fully trained and accredited investigators holding the qualification of Accredited Counter Fraud Officer / Specialist will be commissioned to investigate.

2.5 There may be circumstances where it is appropriate for managers to undertake some preliminary enquiries to ascertain the validity of an allegation or irregularity (for example, to establish whether on the face of it, there is a case to be investigated), however before embarking on such action, advice should always be sought from Section 151 Officer or Deputy as such action may alert the fraudster and could result in the concealing or destroying of vital evidence or compromise the investigation and the collection of further evidence.

2.6 In cases of suspected fraud involving a staff member, the investigating officer will liaise and work with Human Resources at the earliest available opportunity on disciplinary matters such as suspending the staff member to enable further investigation and protect vital evidence.

3. Initial Enquiries

3.1 As stated above, the manager may make discreet initial enquiries to:

- Determine any facts that gave rise to the suspicion.
- Examine any factors to determine whether there has been a genuine mistake made or whether an irregularity has occurred.

3.2 Any actions and findings should be clearly recorded and documented ensuring that access is restricted (for example, not held on an "open" area of the computer network or in the case of paper notes, making sure they are securely locked away).

3.3 It is important that the suspected perpetrator is not interviewed at this stage nor any allegations / suspicions put to them. If in doubt at any point, the manager must seek the guidance of the Section 151 Officer or Deputy.

4. Formal Investigation

4.1 If a formal investigation is required, it will be conducted by a qualified Investigator who will be appointed by the Section 151 Officer or Deputy. The nature of the investigation, lines of enquiry followed and evidence obtained will vary depending on the irregularity being investigated and will, for the most part be fluid and reactive.

4.2 Generally, however, the investigating officer will be seeking to gather evidence by way of interviews, the taking of written witness statements and the obtaining of evidence be it physical, documentary etc.

4.3 In cases of suspected staff fraud, the investigating officer will consult and take advice from Human Resources particularly on matters regarding employment law, policies and procedural matters. It is imperative however, that a clear distinction must be made in these circumstances between those advising the investigating officer and those advising the staff member.

4.4 Legal Services will be consulted as appropriate to advise or seek external advice to support any investigation.

4.5 Any investigation will be conducted with full compliance with The Criminal Procedures and Investigations Act 1996 which governs the conduct of a criminal investigation (such as obtaining and recording evidence etc.) as well as any other legislation that may apply such as The Police and Criminal Evidence Act 1984 (PACE), The Regulation of Investigatory Powers Act 2000 (RIPA), The Human Rights Act 1998 and Data Protection Act etc. (this list is meant as an example and is not exhaustive).

4.6 In general terms however, the following principles will apply to the investigation:

- Any investigation will be conducted promptly (subject to evidence gathering activities) with periodic updates given as appropriate to the Section 151 Officer or Deputy and / or the Director of the relevant service
- All actions and evidence will be recorded either by written or electronic means and stored securely with access given purely on a "need to know" basis
- Enquiries and evidence gathering activities will be undertaken as discreetly as possible with sensitivities observed where appropriate
- Confidentiality will be maintained throughout with information only shared where circumstances and the law allow.

4.7 Where it is considered appropriate, the investigation may involve the input of other agencies such as local authorities as well as other law enforcement agencies such as the Police and HM Revenue & Customs. Liaison and / or joint working will be conducted in accordance with established guidelines and protocols.

4.8 The investigating officer must not and will not accept any offer of repayment of monies or resignation at any stage during the investigation, however any such offers will be noted and recorded on the investigation file and reported to the Section 151 Officer or Deputy The Council has a right to suspend any employee involved pending the outcome of an investigation. Any such suspension, is, in the opinion of the Council, a neutral act and does not imply any guilt on behalf of the suspended employee. The suspension of an employee can, in some circumstances aid the speed in which an investigation can be conducted and serve to preserve vital evidence.

4.9 When suspects are not suspended, supervision of the employee will usually need to be increased, and any manager should seek the advice of Human Resources and ICT on how this can best be accomplished.

5. Actions following the completion of an investigation

5.1 Upon the completion of an investigation, the investigating officer will report their findings in the first instance to the Section 151 Officer, who will (in staff related cases) in turn, make the findings known to Human Resources and the relevant Director.

5.2 Should any control weaknesses be identified, the Director and relevant manager will be informed and remedies actioned immediately. The Section 151 Officer or Deputy will be able to provide advice and support regarding effective control mechanisms.

5.3 Should there be disciplinary issues identified as part of the investigation, a full report will be made to Human Resources who will work with the relevant Director and manager to decide what happens next. Should any course of action result in a disciplinary hearing, the investigating officer will (if required) make themselves available to give evidence at the hearing.

5.4 Although some organisations delay the bringing of any disciplinary action pending the outcome of any criminal prosecution, the Council will seek to deal with any disciplinary matters using the appropriate processes.

5.5 Should it be the case that criminal action presents itself as an option, this decision will be fully explored and subject to the Council's Fraud Sanction and Prosecution Policy.

5.6 Should fraud be proven, the Council will make look to recover any monetary losses. The method of doing so may vary depending on the type of loss and relevant legislation, however all options will be explored including civil court proceedings and in the case of criminal prosecution, proceedings brought under The Proceeds of Crime Act 2002.

6. Record-keeping

6.1 We must keep financial records and have appropriate internal controls in place which will evidence

- the business reason for making payments to third parties.
- appropriate accounting arrangements

Appendix 2

Definitions

What is fraud and corruption

The Chartered Institute of Public Finance and Accountancy (CIPFA) defines fraud and corruption as:

Fraud – "*the intentional distortion of financial statements or other records by persons internal or external to the authority which is carried out to conceal the misappropriation of assets or otherwise for gain*".

Corruption – "*the offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person*".

In addition, fraud can be defined as "*the intentional distortion of financial statements or other records by persons internal or external to the authority, which is carried out to mislead or misrepresent".*

Fraud can be broadly described as acting dishonestly with the intention of making a gain for themselves or another, or inflicting loss (or a risk of loss) on another, including:

- Dishonestly making a false representation
- Dishonestly failing to disclose to another person, information which they are under a legal duty to disclose
- Committing fraud by abuse of position, including any offence as defined in the Fraud Act 2006

The Fraud Act can be found here Fraud Act Legislation and this Act gives a broader scope to the definition of Fraud. Corruption is the dishonest, fraudulent or criminal use of entrusted authority or power for personal gain or other unlawful or unethical benefits.

Theft

The Theft Act 1968 defines theft as dishonestly appropriating property belonging to another with the intention of permanently depriving them of it.
Within Councils theft is taking any property belonging to the Councils or which has been entrusted to it including cash, equipment, vehicles and data. Theft does not necessarily require fraud to have been committed. Theft can also include the taking of property belonging to staff/members whilst on Council property.

Bribery

The Bribery Act 2010 defines bribery as "the inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages whether monetary or otherwise".

More details of offences under the Bribery Act 2010, definitions of 'facilitation payments', 'kick backs' and 'third parties' and the Council's approach to Bribery can be found with the Anti Bribery and corruption policy.

Economic Crime

The Government's Economic Crime Plan 2019 agreed a common language across the public and private sectors regarding economic crime. This policy recognises the increase in economic crime which refers to a broad category of activity involving money, finance or assets, the purpose of which is to unlawfully obtain a profit or advantage for the perpetrator to cause loss to others. This can include fraud against the individual, private and public sectors, terrorist financing, sanctions contravention, market abuse, corruption and bribery, and the laundering of proceeds of all crimes.

The Economic Crime and Corporate Transparency Act 2023 includes the offence of failure to prevent fraud which is to ensure that organisations are effectively held to account for committing serious crimes. Organisations become criminally liable if they profit or benefit from fraud committed by their employees or by a person associated with the council. The Act only applies if organisations are categorised as 'large', meeting two out of three of the following criteria:

- More than 250 employees
- More than £36 million turnover
- More than £18 million in total assets

Under this offence, an organisation will be liable where a specified fraud offence is committed by an employee or associated person, for the organisations benefit, and the organisation did not have reasonable fraud prevention procedures in place. The person could be prosecuted for the offence, and the organisation can be prosecuted for failing to prevent the fraud with sanctions administered, including unlimited fines.

An organisation does not need to actually receive any benefit, either financial or non-financial, for the offence to apply – since the fraud offence can be committed before any gain is made. It is enough that the organisation was the intended beneficiary.
The specified fraud offences are:

- Fraud offences under Section 1 of the Fraud Act 2006 including:
    - Fraud by false representation (Section 2)
    - Fraud by failing to disclose information (Section 3)
    - Fraud by abuse of position (Section 4)
- Participation in a fraudulent business (Section 9 of the Fraud Act 2006)
- Obtaining services dishonestly (Section 11 of the Fraud Act 2006)
- Cheating the public revenue (Common Law)
- False accounting (Section 17 of the Theft Act 1968)

- False statements by company directors (Section 19 of the Theft Act 1968)
- Fraudulent trading (Section 993 of the Companies Act 2006)

Money Laundering

Money laundering is the process of channelling ‘bad’ money into ‘good’ money in order to hide the fact that the money originated form criminal activity.

More information about Council’s approach to Anti Money Laundering can be found with the Anti Bribery and corruption policy

Facilitation payments

Facilitation payments, also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example, by a government official). They are not common in the UK but are common in some other jurisdictions.

What are kick backs

What are kickbacks

Kickbacks are typically payments made in return for a business favour or advantage.

Who are third parties

Third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

DRAFT

Sanctions and Prosecution Policy

MALDON
DISTRICT COUNCIL

Document title	Sanctions & Prosecutions Policy 2026
Summary of purpose	To assist in the
Prepared by	Michelle Lamarre
Status	Draft
Version number	1
To be approved by	Strategy and Resources Committee
Approval date	23 July 2026
Date of implementation	23 July 2026
Review frequency	3 yearly or legislative changes
Next review date	July 2029
Circulation	All staff and Members
Published on the Council's website	No

Prosecution Policy

This document is written with reference to:

- The Police and Criminal Evidence Act 1984 (PACE)
- The Local Government Finance Act 1992
- The Council Tax Reduction Schemes (Detection of Fraud and Enforcement) (England) Regulations 2013
- Prevention of Social Housing Fraud Act 2013
- The Fraud Act 2006

Introduction

Maldon District Council (MDC) is responsible for accurately administering all discounts and exemptions for Council Tax and Non-Domestic Rates as well as the delivery of Housing Benefit (HB)* and Local Council Tax Support (LCTS) to its citizens. Benefits are provided to the most vulnerable in society and all benefits and/or other reductions should be assessed and paid within both government and local guidelines.

*From 1st September 2015 the investigation of alleged Housing Benefit fraud is investigated by the Department for Work and Pensions.

MDC is committed to protecting public funds through its action against fraud and recognises that some people will attempt to obtain LCTS, discounts or exemptions to which they are not entitled. Officers are employed to visit, provide help and to investigate suspected or alleged offences.

Sometimes attempt to obtain reductions to which there is no entitlement is done with planning and intention. Where intention and planning is involved, MDC will consider the circumstances of the case and individual and, where appropriate, will consider further action, including prosecution, under the appropriate section of the relevant statute.

Attempting to obtain LCTS, discounts or exemptions to which there is no entitlement by fraudulent means is a criminal offence. MDC works in partnership with ARP who provide fraud investigation services to them. Trained investigation officers undertake investigations into cases where it appears fraud may have been committed.

Fraud Investigation

An investigation carried out by investigation staff has four important functions.

1. To establish the facts.
2. To gather sufficient admissible evidence to support a sanction.
3. To gather sufficient admissible evidence to support a prosecution.
4. To gather and collate information to enable the correct claiming of subsidy.

Such an investigation will only be considered where it is in the public interest to do so. In the majority of fraudulent cases the fraud investigation will reveal facts that question the validity of the benefit in payment, as a consequence the benefit may be suspended or cancelled. The withdrawal of benefit may be sufficient in itself to conclude the investigation.

Which sanctions can MDC apply?

	Local Council Tax Support	Council Tax Discounts and Exemptions	Social Housing / Housing Applications
Which Sanction	Prosecution Administrative Penalty Caution Penalty	Prosecution Caution Civil Penalty	Prosecution Caution

Sanction thresholds

In general MDC will apply the appropriate sanction in accordance with the following criteria:

Prosecution............................... Where the fraudulent financial gain is equal to or exceeds £4,000 and/or other conditions apply to make prosecution the first option.

Alternative to prosecution .... Where the fraudulent financial gain is less than £4000 or other conditions apply which make an alternative to prosecution the first option

Where certain social security benefits administered by the Department for Work & Pensions (DWP) are also in payment the investigation officer make a referral via a SFI LA Referral Form.

Prosecution

Where offences are disclosed by an investigation MDC will consider the circumstances of the case, in accordance with this policy, and apply the appropriate sanctions.

Where an investigation officer has investigated a suspected irregularity and it is considered that sufficient evidence has been obtained to support a prosecution against the

offender, the papers will be referred to the Head of Revenues and Benefits (HoS) or a member of the Senior Leadership Team (SLT) for consideration.
Where it is considered that sufficient evidence exists to support a prosecution but, due to the circumstances of the particular case, it is considered that a sanction other than prosecution is appropriate, the HoS or SLT member will authorise that sanction in accordance with this policy.

Where the evidence obtained, and the circumstances of the case indicate that a prosecution is the appropriate sanction the case Manager will forward the case papers to the MDCs' Prosecuting Agent. A Solicitor will review the evidence and having done so commence proceedings on behalf of MDC. Where the Solicitors consider that an alternative sanction to prosecution is appropriate, they will discuss this with the HoS / SLT member, for further consideration.

MDC is conscious that a decision to prosecute an individual is serious and that, even in a small case, a prosecution has serious implications for all involved. Decisions to prosecute should be fair and consistent.

MDC will use the most appropriate deterrent against future fraudulent activity. This requires each referred case to be looked at on its individual merits making reference to any previous sanctions or convictions, before deciding on any further action.

Sanctions will only be considered where it is believed a prosecution could be brought and, where an interview has taken place, it has been conducted in accordance with PACE.

In general terms, the more serious the offence the more likely it is that a prosecution is in the public interest.

A prosecution is likely to be considered where:

- a conviction is likely to result in a significant sentence.
- the accused was in a position of trust or authority.
- the evidence shows that the accused was a ringleader or organiser of the offence.
- there is evidence that the offence was premeditated.
- there is evidence that the offence was carried out by more than one person.
- the previous convictions of the accused or cautions are relevant to the present offence.
- the accused is alleged to have committed the offence whilst under an order of the court.
- there are grounds for believing that the offence is likely to be continued or repeated, for example by a history of recurring conduct.
- the offence is widespread in the area, although not serious in itself.

A prosecution is less likely where the following applies:

- the loss is described as minor and was the result of a single incident, particularly if it was caused by a misjudgement.

- there has been a long delay between the offence taking place and the date of the trial, unless:
    - The offence is serious.
    - The delay has been caused partly by the accused.
    - The offence has only just come to light.
    - The complexity of the offence has meant that there has been a long investigation.
- A prosecution is likely to have a bad effect on the accused's health – this will be balanced against the seriousness of the offence.
- The accused is, or was at the time of the offence, suffering from significant mental or physical ill health, unless the offence is serious or there is a real possibility it may be repeated.

In all cases consideration will be given to the accused offender's frailty, mental health at the time of the offence, and since, and previous convictions (including simple cautions).

As required MDC will advise the Police of all impending prosecutions in accordance with agreed procedures using the prescribed forms. As a consequence, the Police will advise MDC of any previous convictions recorded against the accused in order for presentation to the Court. At the conclusion of the case the MDC will advise the Police of the result, again using the prescribed forms.

In summary:

A prosecution will be considered where the following criteria apply:

1) The overpayment is over £4000, or

    1) The person has declined or withdrawn the offer of an appropriate, alternative sanction; or

    2) other factors make prosecution appropriate such as:
        - The fraud has continued over a long period, or
        - The person has been previously convicted of benefit fraud, or
        - The person has previously been the subject of an Administrative Penalty procedure, or
        - There was planning involved in the process, or
        - The person was in a position of trust (e.g., a member of staff) or
        - There were other persons involved in the fraud, or
        - The case has arisen from a collusive landlord/employer investigation, or
        - Other aggravating factors.

The outcome of prosecutions will be logged with the Police.

Alternatives to Prosecution

The Use of Local Authority Cautions

A Local authority caution is a warning given in certain circumstances as an alternative to prosecution, to a person who has committed an offence. It is a purely administrative function. Before issuing a Local authority caution the following conditions must have been satisfied (as outlined in *R (Wyman) v Chief Constable of Hampshire Constabulary* [2006] EWHC 1904 (Admin):

- there must be sufficient evidence to justify instituting criminal proceedings; and
- the person has admitted the offence; and
- it was a first offence (only in exceptional circumstances will a second caution be delivered for a separate offence).

If a Local Authority caution is offered but not accepted by the offender, then the matter may be referred for criminal prosecution.

Cautions will be administered wherever fraudulent activity has been proven but is at the lower end of the range of benefit fraud. Cautions will only be given where a person is over 18, has committed an offence and:

- There is sufficient evidence to justify criminal proceedings.
- The person has admitted the offence during an interview under caution.
- The person's history of previous convictions has been taken into account.
- The person must sign a document to show they admit the offence.
- The person agrees to the caution and they acknowledge they have been cautioned.
- The person has not been coerced into accepting a caution.

The standard of evidence used for a caution will be the same as required to prosecute. If a caution is refused the case will be put forward for prosecution and the court will be informed of the refusal to accept a caution. Where a person has moved into another Authority's area before the caution can be conducted, the fraud file will be transferred to the relevant authority with a request to continue any caution action. The administration of the caution may be delegated to an investigating officer on the authority of the Fraud and Visits Team Manager / Assistant Manager, but not to the investigating officer in the case.

At the time of the caution being administered the accused will be required to sign a separate statement admitting the offence and accepting the caution.

A caution will in general be considered appropriate if the following apply:

- The offence is minor, the amount of overpayment is under £4,000, and the court is likely to award a minimal sentence.

- The person has not offended before or the person has committed benefit fraud before, but the offence was minor, the person was not cautioned or prosecuted, and the current offence is also minor.
- The person's attitude towards their offence indicates that a caution would be an appropriate punishment – consider:
    - The willfulness with which the person committed the offence; and,
    - Their subsequent attitude, i.e., whether they express genuine regret for what they have done.
    - There is a reasonable expectation that this will curb his/her offending.

Therefore, a caution may be considered where the requirements for prosecution have been fulfilled and the overpayment is under £4000 and any of the following criteria apply:

- It is a first offence.
- It is not a first offence, but previous offences comply with the above criteria.
- Criminal proceedings are not recommended in this case.

In the event of the claimant declining to accept a caution, criminal proceedings will always be considered.

Council Tax Reduction Scheme - Penalties as an alternative to Prosecution

The Regulations regarding the Penalties as an alternative to Prosecution are laid out in Regulation 11 of The Council Tax Reduction Schemes (Detection of Fraud and Enforcement) (England) Regulations 2013. In summary:

- there must be grounds for instituting proceedings against a person for an offence relating to an act or omission on the part of the person in relation to the Council's Council Tax Reduction Scheme; and
- The act or omission did result in or could have resulted in an excess reduction
- The person must be invited to agree to pay a penalty
- If the person agrees to pay a penalty, then no proceedings will be instigated against them for the offence
- Where an excess reduction has been made, the amount of the penalty is 50% of the amount of the excess reduction subject to a minimum amount of £100 and a maximum of £1000.
- Where an excess reduction would have been made, the amount of the penalty is £100.

The Council will consider a Council Tax Reduction Scheme penalty as an alternative to prosecution where:

- it was a first offence; and
- in the opinion of the Council, the circumstances of the case mean it is not overwhelmingly suitable for prosecution; and
- there is a strong likelihood that the excess reduction plus penalty will be repaid

It is important to note that the person need not have attended or admitted the offence at an interview under caution for a penalty to be offered.
If a penalty is offered but not accepted by the offender, then the matter may be referred for criminal prosecution.

Civil Penalties

Council Tax Reduction Scheme – Penalties

The Regulations regarding the penalties for incorrect statements or failing to notify changes of circumstances are laid out in Regulations 12 & 13 of The Council Tax Reduction Schemes (Detection of Fraud and Enforcement) (England) Regulations 2013. In summary:

The Council can impose a penalty of £70 on a person where:

- they negligently make an incorrect statement or representation, or negligently give incorrect information or evidence—
    - in or in connection with an application; or
    - in connection with the award of a reduction under a council tax reduction scheme
        - the person fails to take reasonable steps to correct the error.
        - the error results in an award of a reduction under a council tax reduction scheme which is greater than the amount to which the person was entitled (an "excess reduction"); and
        - the person has not been charged with an offence or cautioned, or been given a notice under regulation 11, in respect of the excess reduction (see section… below)

The Council can impose a penalty of £70 on a person where—

- The person, without reasonable excuse, fails to give a prompt notification of a relevant change of circumstances to the authority in accordance with requirements imposed on the person under its council tax reduction scheme
- the failure results in an award of a reduction under a council tax reduction scheme which is greater than the amount to which the person was entitled (an "excess reduction"); and
- The person has not been charged with an offence or cautioned or been given a notice under regulation 11 (see section …. below), in respect of the excess reduction.
- In this regulation, "relevant change of circumstances", in relation to the person, means a change of circumstances which the person might reasonably be expected to know might affect the person's entitlement to, or the amount of, a reduction under the authority's scheme.

- A notification of a change is prompt if, and only if, it is given within a period of 21 days beginning with the day on which the change occurs, or a soon as reasonably practicable after the change occurs, whichever is later.
- The Council will consider the application of a penalty in all suitable cases.

Council Tax – Penalties

Under Section 14(2) and Schedules 2 & 3 of The Local Government Finance Act 1992, the Council may impose a penalty of £70 where a person:

- fails to notify the authority, without reasonable excuse, on any matter which affects entitlement to discount.
- fails to notify that their dwelling is no longer an exempt dwelling.
- fails to notify the Authority that they are jointly liable for the tax.
- fails to supply relevant information requested in order to establish liability.
- fails to supply relevant information requested after the issue of a Liability Order has been obtained. Failure to supply could lead to a criminal prosecution and a fine.

Where a penalty has been imposed under (5) and a further request to supply the same information is made, a further penalty of £280 may be imposed for each subsequent failure, provided:

- it is in the debtor's possession.
- the authority requests him to supply it.
- it falls within a prescribed description of information.

Appeals against the imposition of penalties are to the Valuation Tribunal. Penalties are recovered in the Magistrates court.

The Council will consider the application of a penalty in all appropriate circumstances; however, it may not impose a penalty in respect of conduct by a person that has led to his being convicted of an offence

General considerations

It is acknowledged that there will be cases that do not fall within any of the aforementioned categories or possess aggravating factors. All cases will be considered on their merits and the action considered appropriate taken in each case.

Conclusion

This policy outlines the main areas MDC will consider when dealing with potentially fraudulent actions.

MDC supports the firm and vigorous pursuit of fraud but recognises that this should be done in a reasonable and professional manner that respects the innocent, deals appropriately with offenders, and protects the safety of every member of staff.

REPORT of
DIRECTOR OF PLACE, PLANNING AND GROWTH

to
STRATEGY AND RESOURCES COMMITTEE
23 JULY 2026

FRIARY FIELDS PROPERTY ACQUISITION

1. PURPOSE OF THE REPORT

1.1 To seek approval to acquire Friary Fields, Maldon, a property comprising six self-contained one-bedroom flats, for use as Temporary Accommodation (TA).

1.2 The acquisition will increase the Council's supply of in-district temporary accommodation, reduce reliance on costly nightly paid and out of area placements, and provide a long term housing asset that supports the Council's statutory homelessness duties. Approval is also sought for a total capital budget of up to £800,000, comprising the acquisition cost together with essential refurbishment and compliance works required prior to occupation.

2. RECOMMENDATIONS

(i) That a capital budget of up to £800,000 be approved to fund the acquisition of the property and any essential refurbishment, compliance and associated works required to bring the accommodation into use as temporary accommodation.

(ii) That delegated authority be given to the Director of Place, Planning and Growth, in consultation with the Chairperson of the Strategy and Resources Committee and the Section 151 Officer, to agree the final purchase price, approve the scope of essential refurbishment works within the approved capital budget, and complete the acquisition subject to satisfactory survey, valuation, legal and financial due diligence.

3. SUMMARY OF KEY ISSUES

3.1 **Background**

3.1.1 The Council has a statutory duty to provide temporary accommodation under the Housing Act 1996 (as amended by The Homelessness Reduction Act 2017).

3.1.2 The Housing team actively manage the service, seeking to minimise the number of people who need TA, and reduce the length of stay before a permanent solution can be found. Nevertheless, over recent years the number of households requiring temporary accommodation has averaged around 40 households.

3.1.3 The Council continues to experience sustained demand for TA, particularly from single person households requiring one bedroom accommodation

3.1.4 While out of district placements enable the Council to fulfil its statutory duties, they are not always the most appropriate outcome for residents. Such placements increase travel distance to employment, education, healthcare and support services and may separate households from critical family, community and social networks. Whilst overall homelessness demand has remained relatively stable, significant pressures remain due to limited availability of suitable accommodation within the district, reduced move-on opportunities and increasing reliance on externally sourced nightly paid accommodation.

3.2 **Stephens House**

3.2.1 In 2025 Maldon District Council acquired Stephens House in Heybridge. This was previously a mother and baby unit and was converted into five self-contained flats, including one accessible unit for the provision of TA. This has been a very successful scheme and has reduced the pressure on high cost nightly paid accommodation out of area. The availability of in-district TA has supported better outcomes for residents by allowing them to remain within their local community close to their support networks, demonstrating the value of increasing the Council's own supply.

4. FRIARY FIELDS

4.1 Following the success of Stephens House, the Strategic Housing Working Group has asked Officers to explore whether similar schemes could come forward to increase the Council's supply of TA.

4.2 Friary Fields is a property close to Maldon High Street comprising six self-contained one-bedroom flats. The property was previously used as low-level supported accommodation for residents with mental health conditions and provides an excellent opportunity to increase the Council's temporary accommodation stock.

4.3 Condition surveys have identified that, whilst the building is fundamentally suitable for its intended use, a programme of refurbishment, compliance and improvement works will be required prior to occupation. These works include essential health and safety, compliance and maintenance items, together with some replacement of ageing fixtures and fittings to ensure the accommodation is safe, compliant and suitable for long-term use as temporary accommodation.

4.4 The property provides an opportunity to increase local TA capacity and improve the Council's ability to respond to homelessness presentations within the district.

4.5 The acquisition would reduce reliance on expensive nightly paid accommodation and support improved outcomes for homeless households through provision of local, self-contained accommodation.

4.6 An independent valuation has been carried out. Officers are currently seeking to negotiate a purchase price, reflecting the condition of the property and the investment required prior to occupation. A condition survey has identified refurbishment and compliance works which have been included in the overall total requested.

4.7 In order to avoid the need for further Committee approval should negotiations or final works costs vary, approval is sought for a total capital budget of up to £800,000. This represents the maximum financial commitment and does not commit the Council to spending the full amount.

4.8 The Council has engaged Delta Housing, who have confirmed their willingness to manage the scheme on the Council's behalf, as it does with Stephens House. Subject to the final agreement of lease and management arrangements, Delta Housing will be responsible for the day-to-day management of the accommodation, including tenancy management, property maintenance and resident support functions. The Council will retain nomination rights to ensure the accommodation continues to meet local TA needs. This approach will provide a professionally managed service whilst reducing the operational burden on the Council and enabling efficient mobilisation of the scheme.

4.9 A Business Case is set out in **APPENDIX 1**.

5. CONCLUSION

5.1 The acquisition of Friary Fields presents an opportunity to increase the Council's supply of local TA at a time when suitable one-bedroom accommodation remains in short supply.

5.2 The proposal will reduce reliance on costly out-of-area placements, improve housing outcomes for homeless households and provide a long-term housing asset that can continue to support service delivery during and beyond Local Government Reorganisation.

5.3 Subject to satisfactory completion of valuation, surveys, legal due diligence and financial appraisal, together with acquisition and refurbishment costs remaining within the approved capital budget of £800,000, the proposal is considered a prudent investment that supports both operational service requirements and the Council's longer term strategic objectives.

6. IMPACT ON PRIORITIES AS SET OUT IN THE CORPORATE PLAN 2025 - 2028

6.1 **Supporting our communities**

6.1.1 The proposal will provide safe, self-contained accommodation in a sustainable location for households experiencing homelessness and improve access to accommodation within the district.

6.2 **Investing in our District**

6.2.1 The acquisition will create a long-term Council housing asset and strengthen local accommodation provision for residents in housing need.

6.3 **Growing our economy**

6.3.1 Reducing homelessness and housing instability supports residents' ability to access employment, training, and local services.

6.4 **Delivering good quality services**

6.4.1 The acquisition will improve service resilience, increase local accommodation options and reduce dependence on external accommodation providers.

7. IMPLICATIONS

(i) **Impact on Customers** – The acquisition will increase access to suitable temporary accommodation within district, improving customer experience and quality of life by reducing disruption caused by out-of-area placements.

(ii) **Impact on Equalities** – The proposal will support vulnerable households who are disproportionately affected by homelessness and housing insecurity. No adverse equalities impacts have been identified.

(iii) **Impact on Risk (including Fraud implications)** – Risks include unforeseen property defects, changes to refurbishment costs, compliance requirements, subsidy recovery assumptions and management arrangements. These risks will be mitigated through detailed surveys, legal due diligence, financial modelling and appropriate governance arrangements. Success of the acquisition will be monitored through ongoing performance measures including reduction in the use and cost of nightly paid accommodation, reduction in out of area placements, occupancy levels, and length of stay within TA. These indicators will be reviewed regularly to ensure the scheme continues to deliver the intended financial and operational benefits. Where performance does not meet expectations, options will be considered including review of management arrangements, alternative use of the asset, or wider service reconfiguration to ensure best value for the Council.

(iv) **Impact on Resources (financial)** – Approval is sought for a capital budget of up to £800,000. This comprises the negotiated purchase price together with provision for essential refurbishment, compliance and associated works required prior to occupation.

(v) Seeking approval for a single capital budget provides flexibility to accommodate the final negotiated purchase price and any additional essential refurbishment works identified through detailed inspections, avoiding the need to return to Committee for further approval whilst ensuring that total expenditure does not exceed the approved capital budget.

(vi) The ongoing revenues and costs associated with the acquisition of Friary Fields will be set out and included in future MTFS reports.

(vii) **Impact on Resources (human)** – The accommodation will be managed by Delta Housing on behalf of the Council under a management agreement. As a result, outside of the acquisition, no additional staffing resource is anticipated within the Council for the day-to-day management of the scheme. The arrangement will minimise operational impacts on existing services whilst ensuring the accommodation is professionally managed and maintained.

(viii) **Impact on Devolution / Local Government Reorganisation** – Whilst Local Government Reorganisation will result in in Maldon becoming part of a new unitary authority, statutory homelessness duties will continue throughout the transition period and beyond. The acquisition provides additional housing capacity that can be incorporated into future service delivery arrangements and supports continuity of provision during the transition.

Background Papers:
APPENDIX 1: Business Case

Enquiries to: Danielle Blake, Head of Housing and Building Control.

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REPORT of
DIRECTOR OF NEIGHBOURHOOD SERVICES AND COMMUNITIES

to
STRATEGY AND RESOURCES COMMITTEE
23 JULY 2026

SUEZ DEPOT EXPANSION PROJECT

1. PURPOSE OF THE REPORT

1.1 To present the business case for the Suez Depot Expansion Project (**APPENDIX 1**) and seek approval for the total project budget of £348,289, funded through the Extended Producer Responsibility (EPR) Grant.

2. RECOMMENDATIONS

That the Committee:

(i) approves the total project budget of £348,289;

(ii) notes that the project is fully funded through the EPR Grant;

(iii) agrees to grant a lease for the extension of the site area on terms consistent with the current contract, including a peppercorn rent, and authorises the necessary arrangements to be completed to give effect to this decision.

3. SUMMARY OF KEY ISSUES

3.1 Maldon District Council's waste, recycling and street cleansing services are delivered by SUEZ Recycling and Recovery UK Ltd from the Promenade Park depot. Recent legislative changes arising from the Government's Simpler Recycling reforms have required the introduction of additional vehicles and equipment to meet new statutory service requirements. Consequently, the operational fleet based at the depot has increased by 29% from 21 vehicles to 27 vehicles, placing existing facilities under considerable pressure and resulting in the site operating at, or close to, full capacity

3.2 The current depot layout no longer provides sufficient space to accommodate the expanded fleet efficiently. This has led to increased congestion within the site, constrained vehicle manoeuvring areas and growing health and safety concerns. Without intervention, these constraints are expected to worsen, increasing the risk of operational inefficiencies, service disruption and potential non-compliance with statutory requirements.

3.3 To identify a suitable long-term solution, a feasibility assessment (**APPENDIX 2**) was undertaken to consider a range of options for increasing depot capacity. The options reviewed included:

- extending the existing depot into the adjacent Parks Depot area (Option A1);

- creating a separate lorry parking facility within Promenade Park (Option A2);
- relocating operations to a new depot site (Option B); and
- (Option C) Do nothing.

3.4 Each option was assessed against technical, financial, operational, legal and risk criteria.

3.5 The feasibility analysis (**APPENDIX 2**) concluded that extending the existing depot into the neighbouring Parks Depot area represented the preferred option. This option achieved the highest overall score across the assessment criteria, providing the best balance of operational effectiveness, deliverability and risk management while making use of existing infrastructure. It also had the least impact on residents in terms of noise, traffic, and congestion when compared with the alternative options considered. The proposal will increase operational space by approximately 670m^2, enabling the enlarged SUEZ fleet to be accommodated safely and efficiently while also rationalising and improving the Parks Depot layout.

3.6 The proposed works include the reorganisation of the Parks Depot, relocation of existing structures and utilities, installation of replacement storage facilities, new fencing and associated infrastructure improvements. In addition to creating the capacity required for the waste and recycling fleet, the project will provide a more efficient, organised and safer working environment for the Council's Parks Team through improved storage arrangements, reduced congestion and better use of available space.

3.7 The project supports the Council's objective of maintaining resilient and efficient frontline services and will ensure the Council and its contractor can continue to meet future waste and recycling service demands. The business case for the project (**APPENDIX 1**) was approved by the Senior Leadership Team Project Board on 25 March 2026, and the scheme is fully funded through the EPR Grant, with no additional call on Council resources.

3.8 **Lease Approval**

3.8.1 A lease is needed to formally cover the proposed extension of the site and set out the Council's rights and responsibilities. As the extension is outside existing officer delegations, Committee approval is required before the lease can be completed.

3.8.2 The lease will be in place until the expiry of the contract period in 2032.

3.8.3 The lease will exclude the security of tenure provisions of the Landlord and Tenant Act 1954, so that there is no automatic right to renew at the end of the term. Apart from the site extension and any related changes, the lease will mirror the current agreement.

3.8.4 The peppercorn rent reflects the current lease and keeps the arrangements consistent. This is considered to offer value for money because it supports continued use of the site with one of our partners without adding unnecessary cost or administration, while still protecting the Council through clear lease terms.

3.9 **Financial Case**

3.9.1 The proposed project cost is £348,289 (including contingency).

3.9.2 The proposed option is that this is funded via EPR Grant.

4. CONCLUSION

4.1 The project provides a cost-effective solution to meet service requirements and improve operational efficiency. Approval of the total project budget will enable delivery of the scheme, which is fully funded through the EPR Grant.

5. IMPACT ON PRIORITIES AS SET OUT IN THE CORPORATE PLAN 2025 - 2028

5.1 **Supporting our communities**

5.1.1 This project will help maintain reliable waste, recycling services for residents by ensuring sufficient depot capacity to support the expanded operational fleet. This will reduce the risk of service disruption and help the Council continue to meet statutory waste collection requirements

5.2 **Investing in our District**

5.2.1 The project represents a strategic investment in existing Council-owned infrastructure, making effective use of available land and facilities at Promenade Park. The scheme is eligible to be fully funded through the Extended Producer Responsibility (EPR) Grant, securing external investment into the District without additional cost to the Council.

5.3 **Growing our economy**

5.3.1 Efficient waste and recycling services are essential for supporting local businesses and maintaining an attractive environment for investment and economic activity. By improving the resilience and capacity of frontline services, the project will help ensure continued service provision across the District.

5.4 **Protecting our environment**

5.4.1 The expansion will support the Council's ability to meet the requirements of the Government's Simpler Recycling reforms and accommodate the additional vehicles and infrastructure required to deliver enhanced recycling services. Improving waste and recycling operations will help support environmental objectives and ensure compliance with future legislative requirements.

5.5 **Delivering good quality services**

5.5.1 The project will create a safer, more efficient and resilient operational depot, reducing congestion, improving vehicle manoeuvrability and addressing health and safety concerns. It will enable SUEZ and the Parks Team to operate more effectively while ensuring the Council can continue to deliver high-quality waste, recycling and street cleansing services to residents

6. IMPLICATIONS

(i) **Impact on Customers** – The project will improve the resilience and efficiency of waste and recycling operations by providing sufficient space to accommodate the expanded fleet and associated infrastructure. This will reduce the risk of operational delays and service disruption, helping to maintain reliable collection services for residents and businesses across the District.

(ii) **Impact on Equalities** – No adverse equality impacts have been identified as a result of this proposal. The project relates to operational depot improvements and will support the continued delivery of universal waste and recycling services to all communities within the District.

(iii) **Impact on Risk (including Fraud implications)** – Failure to address the current depot capacity constraints would increase the risk of operational inefficiencies, health and safety incidents, and service disruption as fleet numbers continue to grow. The proposed expansion provides a long-term, lower-risk solution that improves site safety, supports legislative compliance and increases service resilience.

(iv) **Impact on Resources (financial)** – The total project cost is £348,289, including contingency, and will be fully funded through the EPR Grant. As a result, implementation of the project will not require any additional Council capital funding and delivers a cost-effective alternative to site relocation or the acquisition of new depot facilities.

(v) **Impact on Resources (human)** – Delivery of the project will require input from a number of Council services including Assets and Maintenance, Procurement, Finance, Communications, Parks and Waste Management to support procurement, delivery and implementation of the works programme. The project is fully funded through the EPR Grant and therefore does not place additional pressure on Council budgets. In the longer term, the scheme is expected to reduce operational inefficiencies associated with site constraints and provide a more sustainable and resilient depot arrangement for both SUEZ and the Parks Team.

(vi) **Impact on Devolution / Local Government Reorganisation** - The proposal is an operational infrastructure improvement designed to support the continued delivery of statutory waste and recycling services and is not expected to be materially affected by emerging local government reorganisation or devolution arrangements. The project addresses an immediate operational and health and safety requirement and provides benefits regardless of any future governance structures. Furthermore, the investment will enhance the resilience and efficiency of a key frontline service, supporting service continuity through any future period of organisational change.

Background Papers:
APPENDIX 1 – Suez Business Case
APPENDIX 2 – Suez Feasibility Options Analysis

Enquiries to: Jon Sharkey, Director of Neighbourhood Services and Communities.

Strategy and Resources Committee

23 July 2026

Low Risk project: Routine Projects, Limited Stakeholder Involvement, low impact to business operations, low risk to organisation reputation. If your project doesn't fit into these categories, please use the high risk business case: **High Risk.docx**

Project Management Officer (PMO) process at a glance

Business case submission to PMO

- PMO reviews business case tier used (low risk/high risk)
- Tier is either agreed or recommended to use the alternative tier business case dependant on various factors

PMO carries out pre-appraisal checks

- Business case will be checked to ensure the appropriate business case development has been carried out
- The project manager will be advised of any ammendments required.

CLT board

- PM+sponsor is invited to CLT governance board to present the project for approval to move forward
- Decision is made during the board to approve/reject or challenge(this can lead to further business case devlopment.

Project Live

- Project is approved by CLT Board.
- Project reports into the PMO project board on a monthly basis.
- The project manager is expected to complete highlight reports reporting on the progress of the project, reporting any changes to the overall project scope, state or timeline

Document info

Approved date: March 2025 Approved by: CLT governance Board Review date: March 2027

Timescale – ***Ensure to include sufficient contingency – i.e. Allow time for committee meetings, unexpected delays etc.***

Start Date: June 2026 End Date: March 2027

APPENDIX 1

Low risk - Project Title:

Date: 12/02/26	Project Manager: Melissa Curtis	Project Sponsor/Assistant Director: Sue Green/John Sharkey

Summary of Key Issues or opportunity

Clearly define the issue or opportunity, explaining why this project is necessary and its impact on business operations.

SUEZ Recycling and Recovery UK Ltd is requesting additional depot space due to the increased fleet requirements driven by legislative changes associated with Simpler Recycling. These new statutory obligations have brought the introduction of additional vehicles and equipment to deliver the expanded service model. As a result, the fleet has grown and is pushing the site to full operational limits. This fleet expansion has created a pressing need for additional depot space to ensure safe, compliant, and efficient operations.

A feasibility study has been undertaken to evaluate the available options for addressing the depot capacity and operational challenges, including the potential extension of the existing depot, the creation of a separate lorry park, and the alternative of relocating to a new purpose-built site. This analysis assessed each option in terms of financial implications, operational impact, health and safety requirements, and long-term service needs.

Based on these findings, the study recommends expanding into the existing Parks Depot as the most viable and cost-effective solution, ensuring continued safe and efficient service delivery. Rationalising the site to better meet the operational needs of the MDC Parks Team will create a more efficient, organised, and safer working environment. Improved space allocation will ease access to equipment, reduce congestion, and support smoother daily operations, helping the team maintain high service standards as their operational demands continue to grow.

This project can be delivered by utilising the EPR Grant.

A brief description of the project or the change

Outline the desired future state, specifying measurable goals that the project aims to achieve.

The desired future state is an expanded depot that safely and efficiently accommodates SUEZ's enlarged fleet, meets the requirements of Simpler Recycling legislation, and a fully rationalised and improved Parks Depot that supports the operational needs of the team.

The upgraded site will provide adequate capacity for current and projected fleet sizes, ensure safe vehicle manoeuvrability, and create a structured layout that minimises congestion and health-and-safety risks. The Parks Team will benefit from better-planned space, improved storage, and reduced operational clutter, enhancing day-to-day productivity.

To ensure delivery of this future state, the project aims to achieve the following measurable goals:

- Increase operational space to safely accommodate the expanded waste and recycling fleet, providing parking and manoeuvring capacity aligned with 10-year growth forecasts.
- Reduce on-site congestion and near-miss incidents by creating a safer, more efficient depot layout for all vehicle movements.
- Improve operational efficiency by enabling smoother daily departures, faster turnarounds, and reduced delays caused by overcrowding.
- Support the MDC Parks Team by rationalising their depot area, replacing outdated storage, and creating a cleaner, more functional workspace.
- Achieve full compliance with legislative requirements linked to Simpler Recycling, ensuring the site can accommodate new operational models.
- Minimise disruption during implementation by delivering works in phased packages and maintaining service continuity throughout.
- Provide long-term capacity and resilience, ensuring the depot remains fit for purpose for future waste service growth and population increases.

This will be delivered as a programme of works.

Risk Management

A risk management plan is required to be completed alongside this business case: Risk Management Plan.xlsx

Budget, costs and funding:

Provide a high-level overview of the steps, timelines, and resources required to execute the project.

Year	Funding	Costs/required procurement	Budget
2026/2027	EPR Grant	P1: Parks Depot Reorg	**48,620**
		P2: Reinforced concrete & installation of replacement building	**39,525**
		P3: Demolition of Greenhouses, installation of new reinforced concrete base	**60,144**
		P4: Utility Relocation	20,000
		P5a: CCTV	7,000
		P5b:Electrical Removal/Installation Works	16,000
		P6: Installation of Deisel/Ad blue Tanks	7,000
		P7: Fencing & Bollard materials Allowance	100,000
		SUBTOTAL	298,289
		Contingency	*50,000*
		TOTAL	***348,289***

Finance Sign off (to be completed by Finance)

If your project has a specific budget you are required to engage with finance and share this business case with them in order to attain sign off before submitting to the PMO

Finance Officer:	Date:
Agree with business case used (Low risk)	**Yes/No**
Finance Support Project	**Finance Oppose project**
(Delete the option that doesn't apply)	

Explanation

Procurement Sign off (to be completed by procurement)

If your project requires procurement you are required to engage with Procurement, please contact Debbie.white@maldon.gov.uk.

Procurement Officer: Debbie White	Date: 25/02/26
Agree with Business case used (Low risk)	**Yes**
Procurement Support Project	
(Delete the option that doesn't apply)	

Explanation

The works need to be carried out to support Suez as per the details outlined above. Procurement supports this business case

Implementation plan/timelines:

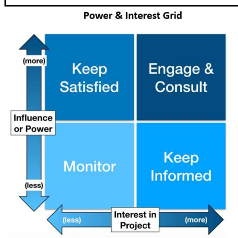
Provide a high-level overview of the steps, timelines, and resources required to execute the project.

Project Objectives	Key Project Milestones	*Dates*
Increased operational capacity	Governance Approval (Strategy & Resources Committee) – Securing formal Council approval to proceed with the recommended option.	23 July 2026
Improved H&S compliance	Procurement Route Agreed & Contractor Mobilisation – Completion of procurement steps, onboarding specialist contractors, and issuing initial work orders.	
Enhance Service Efficiency	Project 1 Works: Parks Depot Rationalisation – Reorganisation of the Parks Depot, including preparation for relocation of concrete bays.	
	Project 2 Works: Reinforced concrete and installation of replacement building	
Support MDC Parks Team Operations	Project 3 Works: Removal of Greenhouses & Storage Structures – Clearance of obsolete structure, installation of reinforced concrete base to enable boundary adjustments.	
Minimise service disruption during delivery	Project 4 Works: Utility Relocation – Relocation of BT pillar, CCTV, and associated data/power infrastructure, followed by new boundary installation.	
Deliver a costs effective sustainable solution	Project 5 Electrical & CCTV	
	Project 6 Installation of Deisel/Ad Blue	
	Project 7 Relocation of Fence & Bollards	
	Construction Completion & Handover – Completion of all physical works, final inspections, and formal sign-off with SUEZ and the Parks Team.	
	Transition to Operational Use – Implementation of operational updates, signage, and new layouts for SUEZ and the Parks Team.	
	Post-Implementation Review – Evaluation of project outcomes against objectives, including safety, efficiency, and operational improvements.	

Stakeholder identification and management:

Identify key stakeholders and explain how you will engage and manage them throughout the project.

Stakeholder name	***Needs***
Members	*Inform*
Suez	*Engage & Consult*
Parks	*Engage & Consult*
Public	*Informed*



Resource required for this project:

List the departments, teams or roles which will be involved within this project.

Parks

Assets & Maintenance

Communications

Procurement

Finance

Departments involved in the project:

List the departments or teams directly or indirectly impacted by the project.

Parks

Suez / Waste (indirect)

Benefits

Benefit	***Measure***
Increased Operational Capacity	Number of vehicles accommodated versus current capacity. Ability to operate improved traffic flow or one-way system. Reduction in vehicle stacking or congestion during peak periods.
Improved Health & Safety Compliance	Reduction in reported incidents and near-misses. Compliance outcomes from HSE audits and internal inspections. Post-project H&S risk assessment improvements.
Enhanced Service Efficiency	Reduction in fleet departure window times. Fewer delays linked to congestion or layout issues. Improved reliability and reduced missed collections.
Strengthened Parks Team Operations	Increased usable space and removal of obsolete structures. Improved equipment accessibility and reduced mobilisation time. Positive staff feedback on work environment and usability.
Future-Proofing for Growth and Legislation	Ability to accommodate projected fleet increases without further expansion. Compliance with Simpler Recycling operational requirements. Ongoing monitoring of space utilisation versus forecast demand.
Reduced Risk of Service Disruption	Fewer operational disruptions caused by layout constraints. Reduction in reactive interventions related to space issues. Improved service resilience indicators.
Cost-Effective Delivery	Actual spend versus feasibility estimates. Quantified cost avoidance from not relocating. Delivery within approved funding envelope.

Implications positive/negative –

(brief description on the applicable points)

Impact on Customers:

Impact on Maldon district:

Impact on organisation:

Impact on Equalities:

Impact on environment:

Stakeholder	Areas of Interest *(What?)*	Method of Communication *(How?)*	Frequency and Key Dates *(When?)*	Responsibility *(Who?)*
Regular Communication				
Consultation and Engagement				
Reactive Communication				

If you feel a communication plan is not necessary/required for this project please tick this box ☐**(Note: a communication plan is required for a project that has any involvement of the external customers as one of its stakeholders)**

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APPENDIX 2

MALDON
DISTRICT COUNCIL

Suez Site Expansion

Promenade Park Site

Melissa Curtis

Capital Projects Manager

Suez Site Expansion Feasibility Options Analysis Report

24th November 2025

APPENDIX 2

Suez Expansion Project – Feasibility Report

This report has been prepared to evaluate the three proposed options for the Suez Site Expansion Project and to conduct a comprehensive feasibility assessment of each.

The document details the proposed options, applies the established feasibility criteria to each, and presents a recommendation based on the resulting analysis

Options Overview

	Option A1: Extend Existing Depot	Option A2: New Lorry Park	Option B: Relocate to New Depot
Proposal	Expand into adjacent land used by Council's Countryside and Parks services	Create a separate nearby lorry park	Move to a new site (minimum 1 acre)
Cost	199,771.75	133,099.43	Est. £225k/year + £35k–£65k rates
Timeline	<6 months	<6 months	>6-12 months
Risks	• Operational impact on Parks Team • Removes MDC future expansion space	• Operational changes for Suez • Potential negative impact on Prom Park	• High financial cost • longer implementation timeline • potential disruption to services.
Benefits	• No operational impact to Suez	• No impact on MDC Parks Team	• Increased asset • Additional Space • Potential to be more fit for purpose

Option A – Site Expansion

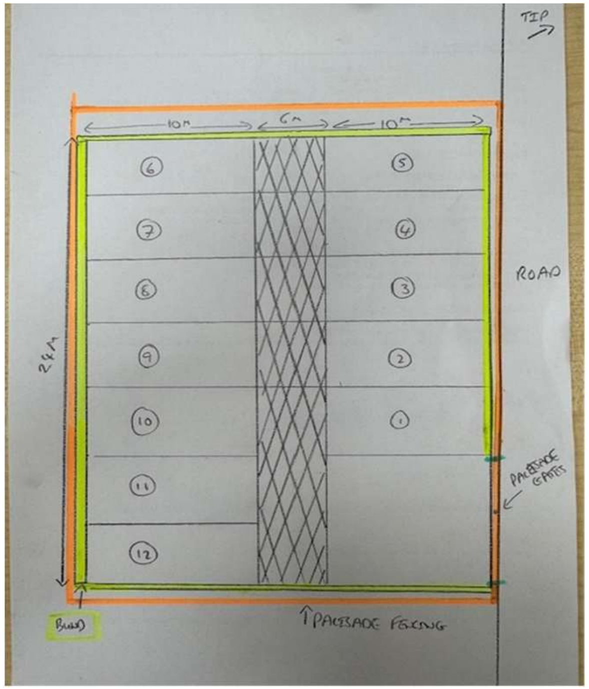
Option A1: Expanded Site into Parks Depot *(yellow – existing, green – proposed)*
reorganise the park depot to allow relocation of the concrete bays, removal of the greenhouses & storage shed, relocation of the existing cctv/electricity/telecoms pillars, new fence boundary and installation of replacement storage room.

Increase of c.670m2

Option A2 – Separate Lorry Park

A2: Separate Lorry Park *(red)*
Creation of a new overflow parking site on the edge of the park with direct road access, lighting, and CCTV.

Increase of c.624m2 (26m x 24m) based on parking for 12 lorries. This is based on technical information provided by Suez.



APPENDIX 2

Feasibility Criteria Descriptions

1. Technical Criterion Description:

Assesses the extent to which the proposed solution meets the required technical specifications, standards, and performance criteria. This includes compatibility with existing systems, and the ability to deliver the intended functionality effectively and reliably.

2. Financial Criterion Description:

Evaluates the overall cost-effectiveness of the proposal, including initial capital expenditure, ongoing operational costs, value for money, and budget alignment. It also considers financial sustainability, return on investment, and any potential cost risks or savings.

3. Operational Criterion Description:

Examines the practicality and feasibility of implementing and operating the solution within the existing organizational framework. This includes resource requirements, ease of integration, delivery timelines, support and maintenance arrangements, and impact on business continuity.

4. Legal Criterion Description:

Reviews the legal compliance of the proposal with relevant laws, regulations, and contractual obligations. It includes considerations such as intellectual property rights, data protection, licensing, liability, and any potential legal risks or constraints.

5. Risk Criterion Description:

Identifies and evaluates potential risks associated with the proposal, including technical, financial, operational, reputational, and strategic risks. It assesses the likelihood and impact of these risks, as well as the robustness of proposed mitigation strategies.

Each criterion is scored on a scale of 0 to 5, where:

5 – Excellent: Fully meets or exceeds all requirements with strong supporting evidence
4 – Good: Meets most requirements with minor gaps or risks
3 – Satisfactory: Meets minimum requirements but with notable limitations.
2 – Weak: Partially meets requirements; significant concerns exist.
1 – Poor: Fails to meet most requirements; major issues identified.
0 – Unacceptable: Does not meet any requirements or is non-compliant.

Feasibility Criteria Scoring

APPENDIX 2

CRITERIA	Option A1: Extend Existing Depot	Option A2: New Lorry Park	Option B: Relocate to New Depot
Technical Criteria	4	2	3
Financial	3	5	1
Operational	4	2	3
Legal	3	3	3
Risk	4	3	2
TOTAL	**18**	**15**	**12**

Summary Analysis

Option	Strengths	Weaknesses	Overall
A1: Extend into Parks Depot	High technical compatibility, strong operational feasibility, and low risk.	Moderate financial score; initial investment may be higher than Option A2.	Best balance across all criteria.
A2: Standalone Lorry Park	Excellent financial viability (score of 5).	Low technical and operational scores; integration challenges likely.	Attractive financially but operational and technical risks are significant.
B: New Location	Moderate technical and operational feasibility.	Very poor financial score and higher risk.	Least favourable option.

Recommendation

Option A1: Extend Existing Depot is recommended as the preferred solution.

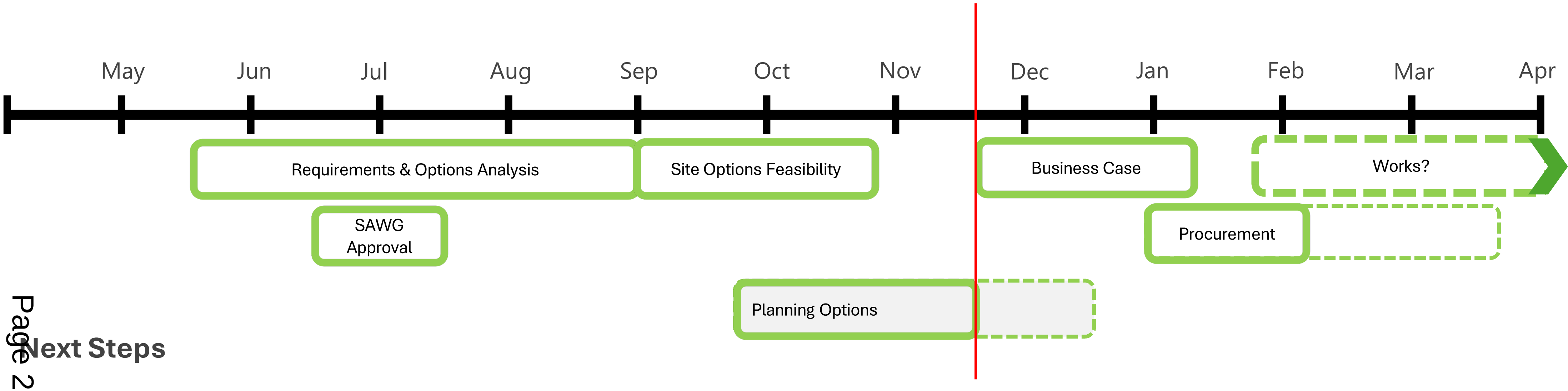
It achieves the highest total score (18) and demonstrates strong technical, operational, and risk performance.

While financial considerations are moderate, the long-term benefits of leveraging existing infrastructure and minimizing disruption outweigh the cost advantages of Option A2.

Option B should not be pursued due to its low overall score and poor financial viability.

APPENDIX 2

Timeline



Next Steps

	Action	Date	Status
1.	Document & agree Suez requirements	June - July	Complete
2.	Document & agree Parks Team requirements, inventory & space planning	July-August	Complete
3.	Shared with SAWG	July	Complete
4.	Feasibility of options and opportunities	June-November	Complete
5.	Business Case Approval (S&R)	December-January	

REPORT of
DIRECTOR OF FINANCE

to
STRATEGY AND RESOURCES COMMITTEE
23 JULY 2026

TREASURY MANAGEMENT OUTTURN 2025/26

1. PURPOSE OF THE REPORT

1.1 To report on the Council's investment activity for the financial year 2025/26 in accordance with the Chartered Institute of Public Finance and Accountancy (CIPFA) Treasury Management Code and the Council's Treasury Management Policy and Treasury Management Practices.

2. RECOMMENDATIONS

(i) That the committee notes the full compliance with all treasury management indicators during the course of the year, and the positive result from investment income secured;

(ii) That the Committee notes the alignment between the Treasury Management Outturn, the Budget Outturn for 2025/26, and the 2025/26 (pre-audit) accounts, which provides confirmation of the overall reported position.

3. SUMMARY OF KEY ISSUES

3.1 Background

3.1.1 The Council has adopted the Chartered Institute of Public Finance and Accountancy's (CIPFA) Treasury Management in the Public Services: Code of Practice (the CIPFA Code) which requires that authorities report on the performance of the treasury management function at least twice yearly (mid-year and at year end).

3.1.2 The Council's Treasury Management Strategy for 2025/26 was presented to the Strategy and Resources Committee on 23 January 2025 and subsequently approved by the Council on 13 February 2025.

3.1.3 During 2025/26, the Council had an average of £22.5m invested. This report covers treasury management activity and the associated monitoring and control of risk.

3.1.4 The 2021 Prudential Code includes a requirement for local authorities to provide a Capital Strategy, a summary document approved by the Council covering capital expenditure and financing, treasury management and non-treasury investments. The Councils Capital Strategy, complying with CIPFA's requirement, was approved by the Council on 13 February 2025.

3.1.5 Council officers have fully complied with the treasury management strategy approved by councillors in February 2025 including the prudential indicators included within it.

3.2 **External Context**

3.2.1 The Council currently engages Link Group to provide treasury management consultancy and advice services. Geo-political volatility continues to impact interest rates and so borrowing costs and investment income. Included at **APPENDIX 1** is information prepared by Link providing an overview of the external economic environment.

3.3 **Local Context**

3.3.1 The Council did not hold any external debt during 2025/26, with the exception of a five-year hire purchase agreement entered into on the acquisition of two tractors in April 2023. The Council is currently under-borrowed to a value of £8.552m. This means that the Council is using internal cash resources to fund borrowing which would otherwise need to be externalised (e.g. through PWLB borrowings). This value is attributable to the cost of waste collection vehicles and investment in the Blackwater Leisure Centre. These were agreed to be treated as internal borrowings initially, with the expectation of externalising that borrowing when necessary.

3.4 **Investment Activity (April 2025 – March 2026)**

3.4.1 Both the CIPFA Code and government guidance require the Council to invest its funds prudently, and to have regard to the security and liquidity of its treasury investments before seeking the optimum rate of return, or yield. The Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults, and the risk of receiving unsuitably low investment returns.

3.4.2 The Council holds significant invested funds, representing income received in advance of expenditure plus balances and reserves held. Over the period from April 2025 to March 2026, the level of investments held by the Council has seen a decrease of £3m with total investments held on 31 March 2026 being £16.4m.

3.4.3 During 2025/26, the Bank of England decreased interest rates to reflect reducing inflation. This has in turn decreased interest returns on investments. The Council has £3m invested in the CCLA (Churches, Charities and Local Authorities) Local Authorities Property Fund and £2m in the Ninety-One Diversified Income Fund, which is a multi-asset fund. The falls in the capital values of the underlying assets were reflected in 31 March 2026 valuations of both funds. The Balance Sheet figure as at 31 March 2026 for long-term investments is recorded at fair value, £4,532k. The Council is using the alternative Fair Value through Profit and Loss (FVPL) accounting and must defer the funds' fair value gains and losses to the Financial Instruments Adjustment Account (which is an unusable reserve until 2025-26) and reflected in the movement in reserves statement.

3.4.4 The Council's £5m of externally managed pooled and property funds generated a total income return of £209k during 2025/26. Because these funds have no defined maturity date, but are available for withdrawal after a notice period, their performance and continued suitability in meeting the Council's investment objectives are regularly reviewed. Strategic fund investments are made in the knowledge that capital values will move both up and down on months, quarters and even years; but with the confidence that over a three to five-year period total returns will exceed cash interest rates. In the light of their performance over the medium/long-term and the Council's latest cash flow forecasts, investment in these funds has been maintained.

3.5 **Performance – Budgeted Income and Outturn**

3.5.1 Below are the average income returns obtained on the Authority's investments:

- Short Term investments – 3.75%;
- Investments in the Ninety-One Diversified Income fund – 4.2%;
- Investment in the Property Fund – 4.2%;
- Average of all investments – 4.6%.

3.5.2 The Authority's budgeted investment income for the year was £0.664m. The actual investment income for the year was £1.047m.

3.6 **Compliance with Prudential Indicators and Treasury Management Strategy**

3.6.1 3.14 All Prudential Indicators for 2025/26, have been complied with to date. **APPENDIX 1** reports on the Council's compliance with Prudential Indicators.

3.6.2 The Section 151 Officer reports that all treasury management activities undertaken during the second half of the year in review complied fully with the CIPFA Code of Practice and the Council's approved Treasury Management Strategy, the above items excepted.

3.7 **Outlook for 2026/27 (Summary of advice from Mitsubishi UFJ Financial Group (MUFG) Corporate Market)**

3.7.1 The last interest rate forecast update was undertaken on 22 December 2025. At that juncture it looked as if domestic inflation would soften through the spring and summer and that the Monetary Policy Committee (MPC) would be in a strong position to reduce Bank Rate to 3.25% by this time 2027.

3.7.2 However, although tepid domestic growth remains a concern (0.1% q/q GDP for Q4 2025) and the current level of annual Consumer Price Index (CPI) inflation was recorded as 3% for February, the US/Israel conflict with Iran has somewhat derailed the prospect of looser monetary policy conditions for at least the next few months.

3.7.3 The primary reason for that sea-change in policy expectations is the energy supply-side shock impacting the world economy, with energy infrastructure coming under attack from both sides of the conflict. Consequently, with clear difficulties remaining as to whether oil can be safely moved via the Strait of Hormuz, and natural gas fields in Qatar, in particular, having suffered significant damage, these are the types of supply-side set back that cannot be rectified quickly.

3.7.4 Colleagues at Capital Economics have noted that the UK entered the energy price shock with household inflation expectations still elevated and CPI inflation far higher than the euro zone's rate of 1.9%. But the surge in oil prices has already caused the average petrol/diesel price to rise to 159p per litre, which probably raised CPI inflation by 0.3ppts in March. And petrol/diesel prices could rise by a further 9.8% in the coming weeks to 175ppl. Their working assumptions about gas prices suggest the Ofgem utility price cap may rise by 30% on 1 July, which would add an extra 1.0ppts to CPI inflation in July. And that's before the indirect boost from businesses passing on some of their energy costs in the prices of non-energy items. In their baseline scenario, they now think CPI inflation could rise to a peak of 4.6% in Q4 2026.

3.8 Although MUFG acknowledge there is upside risk to Bank Rate movements over the course of the coming months, with the energy price shock likely to extinguish growth and add to the already elevated unemployment rate (5.2%), it concurs with Capital Economics' central view that an extended interest rate pause is more likely than interest rate hikes.

3.9 Accordingly, the MUFG Corporate Markets forecast has been revised to reflect that the MPC is unlikely to feel comfortable with cutting rates until the likely rise in inflation has worked its way through the system over the next 12 months. The first Bank Rate reduction in the new forecast is set at Q3 2027. Forecasts will be updated if any material changes to the scenario outlined above occurs.

3.10 Medium to long-term gilt yields are already at multi-year highs and there is clear evidence that a deteriorating UK fiscal position has the potential to propel yields even higher. With CPI inflation due to rise above 4% in the coming months, not only will there be upward pressure on gilt yields from this source, but also additional budgetary considerations arising from the maintenance of the triple lock on pension and benefit payments. The April 2027 increase will be based on the September 2026 reading. Furthermore, debt interest costs will almost certainly be higher than when the Chancellor set out her Autumn Statement, and the Prime Minister will need to identify at what juncture the increase in defence spending to 3% of GDP is going to manifest itself.

4. CONCLUSION

4.1 In compliance with the requirements of the CIPFA Code of Practice, this report provides Members with a summary of the treasury management activity for the financial year 2025/26. As indicated in this report, none of the Prudential Indicators have been breached and a prudent approach has been taken in relation to investment activity with priority being given to security and liquidity over yield.

5. IMPACT ON PRIORITIES AS SET OUT IN THE CORPORATE PLAN 2026 - 2028

5.1 **Delivering good quality services.**

5.1.1 Strong treasury management is required to ensure services can deliver on corporate objectives, which impact residents.

6. IMPLICATIONS

(i) **Impact on Customers** – None directly.

(ii) **Impact on Equalities** – None identified.

(iii) **Impact on Risk (including Fraud implications)** – This report is mainly about managing liquidity risk. A prudent approach continues to be taken in relation to investment activity with priority being given to security and liquidity over yield.

(iv) **Impact on Resources (financial)** – These are covered within this report.

(v) **Impact on Resources (human)** – None directly.

(vi) **Impact on Devolution / Local Government Reorganisation** – None directly.

Background Papers: None.

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Annual Treasury Management Review 2025/26

Maldon District Council
16 July 2026

Contents

Annual Treasury Management Review 2025-26

Purpose

This Council is required by regulations issued under the Local Government Act 2003 to produce an annual treasury management review of activities and the actual prudential and treasury indicators for 2025-26. This report meets the requirements of both the CIPFA Code of Practice on Treasury Management, (the Code), and the CIPFA Prudential Code for Capital Finance in Local Authorities, (the Prudential Code).

During 2025-26 the minimum reporting requirements were that the Council should receive the following reports:

- an annual treasury strategy in advance of the year (Full Council - February 2025)
- a mid-year, (minimum), treasury update report (Strategy & Resources Committee – November 2025)
- an annual review following the end of the year describing the activity compared to the strategy, (this report)

The regulatory environment places responsibility on members for the review and scrutiny of treasury management policy and activities. This report is, therefore, important in that respect, as it provides details of the outturn position for treasury activities and highlights compliance with the Council's policies previously approved by members.

This Council confirms that it has complied with the requirement under the Code to give prior scrutiny to all of the above treasury management reports by the Strategy and Resources Committee before they were reported to Council. Member training on treasury management issues is undertaken for each set of elected members.

Executive Summary

During 2025-26, the Council complied with its legislative and regulatory requirements. The key prudential and treasury indicators detailing the impact of capital expenditure activities during the year, with comparators, are as shown below.

Overall, the most significant capital expenditure in the year related to costs associated with the development and renovation of the leisure centre (£2.5m). Other material schemes included works funded through the Disabled Facilities Grant (£627k), a range of refurbishment of play sites around Maldon (£462k), the refurbishment of four kiosks (£160k), and the lake seating area (£190k) in Prom Park.

Prudential and treasury indicators	31.3.25 Actual £000	31.3.26 Actual £000
Capital expenditure	6,913	5,880
Capital Financing Requirement (including leases):	32	18
External debt including leases	32	18
Investments • Longer than 1 year • Under 1 year • Total	 5,000 16,000 21,000	 5,000 9,500 14,500
Net Investment	20,968	14,482

Other prudential and treasury indicators are to be found in the main body of this report. The Chief Finance Officer confirms that the borrowing limit, (the authorised limit), was not breached.

1. The Council's Capital Expenditure and Financing

The Council undertakes capital expenditure on long-term assets. These activities may either be:

- Financed immediately through the application of capital or revenue resources (capital receipts, capital grants, revenue contributions etc.), which has no resultant impact on the Council's borrowing need; or
- If insufficient financing is available, or a decision is taken not to apply resources, the capital expenditure will give rise to a borrowing need.

The actual capital expenditure forms one of the required prudential indicators. The table below shows the actual capital expenditure and how this was financed.

£m General Fund	31.3.25 Actual	31.3.26 Actual
Capital expenditure	6,913	5,880
Financed in year	2,985	5,894
Unfinanced capital expenditure / Capital Financing Requirement	**3,973**	**3,968**

2. The Council's Overall Borrowing Need

A Council's underlying need to borrow to finance capital expenditure is termed the Capital Financing Requirement (CFR). The CFR results from the capital activity of the Council and resources used to pay for the capital spend. It represents the 2025-26 unfinanced capital expenditure (see above table), and prior years' net or unfinanced capital expenditure which has not yet been paid for by revenue or other resources.

Part of the Council's treasury activities is to address the funding requirements for this borrowing need. Depending on the capital expenditure programme, the treasury service organises the Council's cash position to ensure that sufficient cash is available to meet the capital plans and cash flow requirements. This may be sourced through borrowing from external bodies, (e.g. the Government, through the Public Works Loan Board – PWLB - or from commercial banks), or via temporary cash resources within the Council.

Reducing the CFR – the Council's underlying borrowing need (CFR) is not allowed to rise indefinitely. Statutory controls are in place to ensure that capital assets are broadly charged to revenue over the life of the asset. The Council is required to make an annual revenue charge, called the Minimum Revenue Provision – MRP, to reduce the CFR. This is effectively a repayment of the borrowing need. (This is different to the treasury management arrangements which ensure that cash is available to meet capital commitments – 'liquidity'). External debt can be borrowed or repaid at any time, but this does not change the CFR.

The total CFR can also be reduced by:

- the application of additional capital financing resources, (such as unapplied capital receipts); or
- charging more than the statutory revenue charge (MRP) each year through a Voluntary Revenue Provision (VRP).

The Council's 2025-26 MRP Policy, (as required by MHCLG Guidance), was approved by Full Council as part of the Treasury Management Strategy Report for 2025-26 on 13 February 2025.

The Council's CFR for the year is shown below, and represents a key prudential indicator. It includes PFI and leasing schemes on the balance sheet, which increase the Council's borrowing need. No borrowing is actually required against these schemes as a borrowing facility is included in the contract.

CFR (£000): General Fund	2024/25 Actual	2025/26 Actual
Opening CFR	**55**	**3,982**
Capital Expenditure	6,913	5,880
Total	**6,968**	**9,862**
Financed by:		
MRP	14	14
External sources (Government & Other Grants)	2,467	1,898
Capital Receipts	506	3,982
Revenue Contribution	0	0
Total Financing	**2,987**	**5,894**
Closing CFR	**3,982**	**3,968**

Borrowing activity is constrained by prudential indicators for gross borrowing and the CFR, and by the authorised limit.

Gross borrowing and the CFR – in order to ensure that borrowing levels are prudent over the medium term and only for a capital purpose, the Council should ensure that its gross external borrowing does not, except in the short term, exceed the total of the capital financing requirement in the preceding year (2025-26) plus the estimates of any additional capital financing requirement for the current (2025-26) and next two financial years. This essentially means that the Council is not borrowing to support revenue expenditure. This indicator allowed the Council some flexibility to borrow in advance of its immediate capital needs in 2025-26. The table below highlights the Council's gross borrowing position against the CFR. The Council has complied with this prudential iindicator.

	31.3.25 Actual	31.3.26 Budget	31.3.26 Actual
Gross borrowing position	£0.032m	£0.000m	£0.018m
CFR	£0.032m	£0.000m	£0.018m
Under / over funding of CFR	£0.000m	£0.000m	£0.000m

The CFR in the table above reflects outstanding amount of a Hire Purchase agreement with John Deere (2023/24)

The authorised limit - the authorised limit is the "affordable borrowing limit" required by s3 of the Local Government Act 2003. Once this has been set, the Council does not have the power to borrow above this level. The table below demonstrates that during 2025-26 the Council has maintained gross borrowing within its authorised limit.

The operational boundary – the operational boundary is the expected borrowing position of the Council during the year. Periods where the actual position is either below or over the boundary are acceptable subject to the authorised limit not being breached.

Actual financing costs as a proportion of net revenue stream - this indicator identifies the trend in the cost of capital, (borrowing and other long term obligation costs net of investment income), against the net revenue stream.

	2025/26
Authorised limit	£16.5m
Maximum gross external debt position during the year	£0.018m
Operational boundary	£7.0m
Average gross external debt position	Nil
Financing costs as a proportion of net revenue stream	Nil

3. Treasury Position as at 31 March 2026

The Council's treasury management debt and investment position is led by the finance team. Guiding priorities are liquidity for revenue and capital activities, security for investments and to manage risks within all treasury management activities ('yield'). Procedures and controls to achieve these objectives are well established both through member reporting detailed in the summary, and through officer activity detailed in the Council's Treasury Management Practices. They are subject to review via both internal and external audit.

INVESTMENT PORTFOLIO	31.3.25 Actual £000	31.3.25 Actual %	31.3.26 Actual £000	31.3.26 Actual %
Treasury investments				
Banks	4,159	21.7%	3,769	23.2%
Building societies - rated	2,000	10.4%	2,000	12.3%
Building societies – unrated	0	0.0%	0	0.0%
Local authorities	0	0.0%	0	0.0%
DMADF (H M Treasury)	0	0.0%	1000	6.1%
Total managed in-house	**6,159**	**32.1%**	**6,769**	**41.6%**
Bond funds	2,000	10.4%	2,000	12.3%
Property funds	3,000	15.7%	3,000	18.4%
Cash fund managers	8,000	41.8%	4,500	27.7%
Total managed externally	**13,000**	**67.9%**	**9,500**	**58.4%**
TOTAL TREASURY INVESTMENTS	**19,159**	**100%**	**16,269**	**100%**

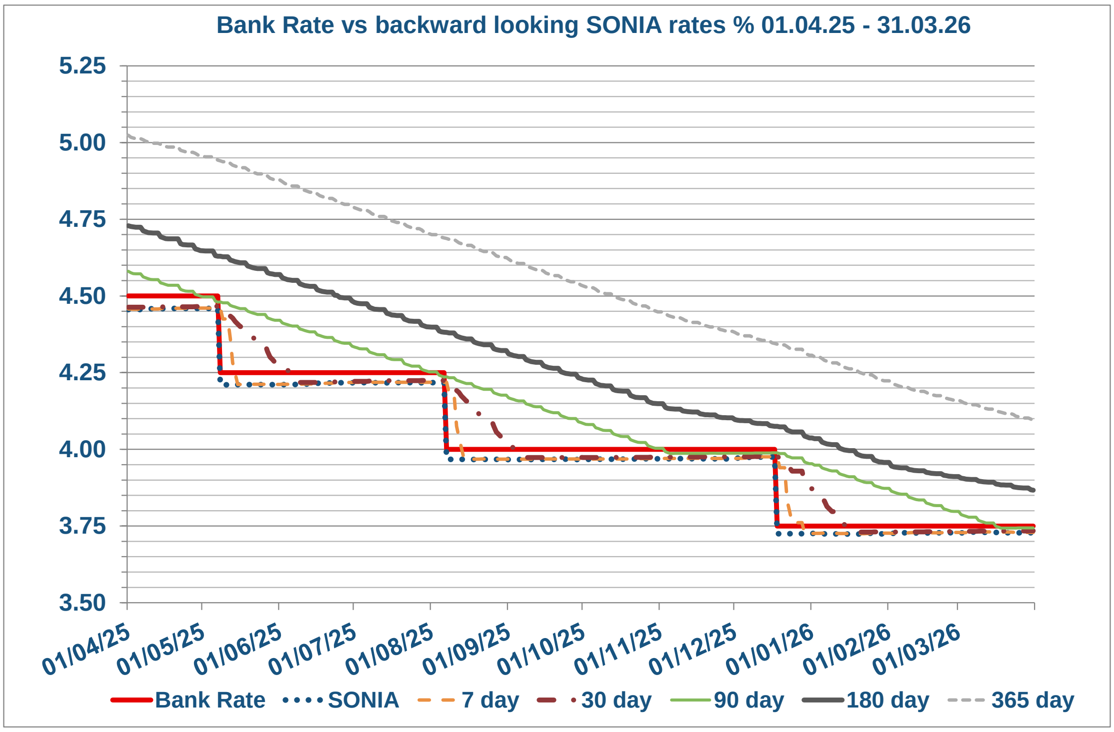
The maturity structure of the investment portfolio was as follows:

	31.3.25 Actual £000	31.3.26 Actual £000
Investments		
Longer than 1 year	5,000	5,000
Up to 1 year	12,000	9,500
Total	**17,000**	**14,500**

4. The Strategy for 2025-26

4.1 Investment strategy and control of interest rate risk

Investment Benchmarking Data – Sterling Overnight Index Averages (Backward-looking) 2025/26



FINANCIAL YEAR TO QUARTER ENDED 31/03/2026

	Bank Rate	SONIA	7 day	30 day	90 day	180 day	365 day
High	4.50	4.46	4.46	4.47	4.58	4.73	5.02
High Date	01/04/2025	07/05/2025	28/04/2025	06/05/2025	01/04/2025	01/04/2025	01/04/2025
Low	3.75	3.72	3.73	3.73	3.74	3.87	4.09
Low Date	18/12/2025	22/12/2025	22/01/2026	21/01/2026	18/03/2026	31/03/2026	31/03/2026
Average	4.04	4.01	4.02	4.05	4.13	4.26	4.55
Spread	0.75	0.74	0.74	0.74	0.84	0.86	0.93

Investment returns remained robust throughout 2025/26 despite Bank Rate reducing steadily through the course of the financial year (three 0.25% rate cuts in total), and at the end of March the yield curve had turned positive, reflecting inflation concerns emanating from the on-going conflict in the Middle East.

Bank Rate reductions of 0.25% occurred in May, August and December, bringing the headline rate down from 4.50% to 3.75%. Two of the Bank Rate cuts occurred in the same month as the Bank of England publishes its Quarterly Monetary Policy Report, therein providing a clarity over the timing of potential future rate cuts.

As of early April 2026, market sentiment has been heavily influenced by the Middle East conflict. Commentators anticipate a growing risk of inflation, meaning interest rates will not be cut for some time, and may increase to counteract inflationary pressures arising from steepening energy costs. Growth will also be impacted in many regions of the world. UK GDP is projected by the Office for Budget Responsibility (3 March 2026) to be 1.1% in 2026 before picking up to 1.6% in 2027 and 2028. But the likelihood is that there is downside risk to this forecast given events in the Middle East through March and still on-going.

Looking back through 2025/26, investors were able to achieve returns generally in a range of 4.5% - 5% for periods ranging from 1 month to 12 months in the spring of 2025. By the end of March 2026 deposit rates were somewhat volatile, regaining some traction as the Middle East conflict suggested energy driven inflation may lead to higher interest rates than would otherwise have been the case. Where liquidity requirements were not a drain on day-to-day investment choices, extending duration through the use of “laddered investments” paid off.

Heading into 2026/27, UK inflation is likely to increase to over 4% in the coming months as oil prices, for example, remain close to $100 per barrel, over 50% higher than before the Middle East conflict started

4.2 Borrowing strategy

No specific external borrowing had been planned for at the time of approving the Treasury and Capital Strategies in February 2025. Interest rate forecasts are provided by Link Group to inform the Council what the cost of borrowing is likely to be should borrowing become necessary.

Forecasts at the time of approval of the treasury management strategy report for 2025-26 were as follows:

MUFG Corporate Markets Interest Rate View 25.03.26	Jun-26	Sep-26	Dec-26	Mar-27	Jun-27	Sep-27	Dec-27	Mar-28	Jun-28	Sep-28	Dec-28	Mar-29
BANK RATE	3.75	3.75	3.75	3.75	3.75	3.50	3.50	3.25	3.25	3.25	3.25	3.25
3 month ave earnings	4.00	3.90	3.80	3.80	3.70	3.50	3.50	3.30	3.30	3.30	3.30	3.30
6 month ave earnings	4.20	4.10	4.00	3.90	3.90	3.70	3.70	3.50	3.50	3.50	3.50	3.50
12 month ave earnings	4.60	4.50	4.40	4.20	4.20	4.00	4.00	3.80	3.80	3.80	3.80	3.80
5 yr PWLB	5.00	5.00	4.90	4.80	4.60	4.40	4.20	4.20	4.10	4.10	4.10	4.10
10 yr PWLB	5.50	5.50	5.40	5.30	5.10	4.90	4.70	4.70	4.60	4.60	4.60	4.60
25 yr PWLB	6.00	6.00	5.90	5.80	5.60	5.40	5.20	5.20	5.20	5.20	5.10	5.10
50 yr PWLB	5.80	5.80	5.70	5.50	5.40	5.20	5.00	5.00	5.00	5.00	4.90	4.90

5. Investment Outturn

The investment activity during the year was within the approved strategy, and the Council had no liquidity concerns.

Resources – the Council’s cash balances comprise revenue and capital resources and cash flow monies. The Council’s core cash resources comprised as follows:

Balance Sheet Resources (£m)	31.3.25	31.3.26
Balances	8,814	7,618
Earmarked reserves	6,569	2,841

Provisions	100	100
Usable capital receipts	994	1,019
Total	**13.737**	**16.302**

Investments held by the Council

- The Council maintained an average balance of £22.580m of investment funds.
- The invested funds earned an average rate of return of 4.64%.
- Total investment income was £1.047m compared to a budget of £0.664m primarily due to the phasing of capital spend in year. Additionally, higher interest rates than assumed through the year, drove a larger return.

Investments held by fund managers

The Council uses 5 external fund managers to invest part of its cash balances. The performance of the managers against the benchmark return was:

Fund Manager	Investments Held (£m)	Average Return (%)	Benchmark (%) *
Federated	£0.000	0%	3.0
Goldman Sachs	£0.000	0%	3.0
Deutsche	£4.500	4.02%	3.0
CCLA	£3.000	4.17%	3.0
Ninety One	£2.000	4.20%	3.0

This compares with a budgeted 2025-26 assumption of average investment balances of £22m at 3% investment return. Performance during the year has been better than estimated when setting the budget, as investment balances were maintained at a higher level and interest rates were increased and held higher by the Bank of England than anticipated.

6. The Economy and Interest Rates

UK Economy

As with 2024/25, UK inflation has proved somewhat stubborn throughout 2025/26. Having started the financial year at 3.5% y/y (April), the CPI measure of inflation peaked at 3.8% from July to September, before dipping to 3% in January and February. Core inflation picked up to 3.2% in February, from 3.1%, and the recent upward pressure on energy costs could see CPI inflation breach 4.5% later this year.

Against this backdrop, the continued lack of progress in ending the Russian invasion of Ukraine, and the potentially negative implications for global growth as a consequence of the implementation of US tariff policies, Bank Rate reductions look limited for the remainder of 2026 (as they do in the euro-zone). Bank Rate currently stands at 3.75%.

Moreover, borrowing has becoming more expensive in 2025/26. Gilt yields have risen materially in March 2026, more than reversing the falls earlier in the financial year. Additionally, the public finances have remained under pressure. The higher-than-expected public net sector borrowing of £14.3bn in February was £2.2bn above last February's outturn. But that borrowing overshoot was mainly due to timing effects relating to the £13.0bn government debt interest payment. That came in as the highest payment since June 2025, causing a 12.3% y/y jump in spending. On the flip side, sitting at £8.1bn, tax revenues were also higher than last February, largely on the back of solid growth in self-employment incomes in 2024/25, boosting self-assessment income tax receipts and stronger capital gains tax receipts.

However, the combination of some energy price support and pressures from higher inflation amid the ongoing energy price shock, higher interest rates and a weaker economy will ultimately put borrowing on an upward trend. With the rise in energy prices possibly pushing the Retail Prices Index inflation up to a peak of 5.7%, debt interest repayments will increase by about £10bn. A weaker growth profile, higher inflation, higher interest rates and gilt yields could erode about £11bn of the Chancellor's £23.6bn headroom.

The loosening in the labour market continues to bear down on wage growth. The 3myy growth rate of average earnings including bonuses slowed from 4.2% in December to 3.9% in January. Meanwhile, excluding bonuses, private earnings growth continued to fall from 3.4% to 3.3%.

The table below provides a snapshot of the conundrum facing central banks: inflation pressures remain, labour markets are still relatively tight by historical comparisons, and central banks are also having to react to a fundamental re-ordering of economic and defence policies driven largely by the US administration.

	UK	Eurozone	US
Bank Rate	3.75%	2.0%	3.5%-3.75%
GDP	0.1%q/q Q4 (1.0%y/y)	+0.2%q/q Q4 (1.2%y/y)	0.7% Q4 Annualised
Inflation	3.0%y/y (Feb)	1.9%y/y (Feb)	2.4%y/y (Feb)
Unemployment Rate	5.2% (Jan)	6.2% (Jan)	4.4% (Feb)

The Bank of England sprung no surprises in their March meeting, leaving Bank Rate unchanged at 3.75% by a vote of 9-0, but suggesting rates may need to rise if inflation picks up markedly. The vote could best be described as moderately hawkish. The MPC stated it “stands ready to act as necessary” and “is alert to the increased risk of domestic inflationary pressures through second-round effects in wage and price-setting”. Even so, we suspect the committee is likely to put equal weight on higher inflation and weaker growth, particularly the poor macroeconomic backdrop prior to the energy shock, keeping interest rates at 3.75% this year.

10-year Gilt yields have been exceptionally volatile in the final weeks of 2025/26, troughing at around 4.23% in late February before shooting up to 5.00% (and well through that on an intraday basis). That spike was driven by the outbreak of war in the Middle East, which prompted a dramatic reassessment of investors’ Bank of England policy rate expectations. Having been pricing in rate cuts in late-February, as many as four rate *hikes* were discounted by late-March. The 10-year yield ended the quarter at 4.92% with around 65bp of rate hikes priced in over the coming year. In addition to more hawkish monetary policy expectations, part of this increase in yields probably reflected an increase in term premia amid concerns that the government may react by loosening the fiscal purse strings.

As for equity markets, the FTSE 100 experienced another volatile quarter, surging to an all-time high of around 10,900 in late February, leaving it up 10% from the start of 2026, before giving back most of those gains in March after the outbreak of the Middle East conflict. That pullback leaves the index at around 10,176 at the end of the quarter. For context it was at 8,582 at the start of April. The £ has stayed relatively resilient also at $1.33, strengthening from $1.29 back in April.

7. Other Issues

1. **IFRS 9 fair value of investments**

English authorities: Following the consultation undertaken by the Department of Levelling Up, Housing and Communities [DLUHC] on IFRS 9, the Government has extended the mandatory statutory override for local authorities to reverse out all unrealised fair value movements resulting from pooled investment funds to 31st March 2026. Local authorities are required to disclose the net impact of the unrealised fair value movements in a separate unusable reserve throughout the duration of the override in order for the Government to keep the override under review and to maintain a form of transparency.

The Council has 2 Pooled Funds that are valued at Fair Value at 31 March each year.

Fund	***Invested Amount £000***	***Fair Value £000***	***Capital Gain/(Loss) £000***
CCLA - Lamit Property fund	3,000	2,764	-236
Ninety One (INVESTEC) - Diversified Income Fund	2,000	1,768	-232
Total	5,000	4,532	-468

Both pooled funds are lower in fair value than the amounts originally invested. This means that had they been redeemed on 31 March the investment market would have dictated that the Council will have only received £4.532m instead of the £5m invested. A statutory over-ride means this loss will not be charged to the Council's Comprehensive Income and Expenditure account. The statutory over-ride remains in existence until 31 March 2026. After that point there is a risk that any loss in value would impact negatively on the General Fund reserve is that override is lifted. Conversely, an increase in value would be a positive impact on the General Fund. This is being monitored closely.

These investments are still held as long-term investments and the nature of them mean their values rise above the invested amount and fall below frequently over time. E.g. On 31 March 2022 they were valued at £5.223m. Also, Investment returns on these funds are received every year. In the last financial year £209k was received. These pooled funds are very unlikely to be needed on short notice by the Council, so the timing of divesting from these investments can be strategically decided for the greatest benefit for the Council.

Appendix A: Investment Portfolio

Investments held as at 31st March 2026:

	31-Mar-26
	Actual Portfolio
	£000
Treasury investments:	
UK Banks - Natwest - Barclays	 1,769 2,000
Building societies (unsecured) - Nationwide	 2,000
Certificate Deposit	0.0
Money Market Funds - Federated - Deutsche	 4,500 0.0
Local Authorities	
Other Financial Intermediaries - CCLA Lamit - Ninety One	 3,000 2,000
Debt management office	1,000
Total treasury investments	**16,269**

ABBREVIATIONS USED IN THIS REPORT

CFR: capital financing requirement - the Council's annual underlying borrowing need to finance capital expenditure and a measure of the Council's total outstanding indebtedness.

CIPFA: Chartered Institute of Public Finance and Accountancy – the professional accounting body that oversees and sets standards in local authority finance and treasury management.

CPI: consumer price index – the official measure of inflation adopted as a common standard by the UK and countries in the EU. It is a measure that examines the weighted average of prices of a basket of consumer goods and services, such as transportation, food and medical care. It is calculated by taking price changes for each item in the predetermined basket of goods and averaging them.

DLUHC: the Department for Levelling Up, Housing and Communities - the Government department that directs local authorities in England.

ECB: European Central Bank - the central bank for the Eurozone

EU: European Union

EZ: Eurozone -those countries in the EU which use the euro as their currency

GDP: gross domestic product – a measure of the growth and total size of the economy.

G7: the group of seven countries that form an informal bloc of industrialised democracies - the United States, Canada, France, Germany, Italy, Japan, and the United Kingdom - that meets annually to discuss issues such as global economic governance, international security, and energy policy.

Gilts: gilts are bonds issued by the UK Government to borrow money on the financial markets. Interest paid by the Government on gilts is called a coupon and is at a rate that is fixed for the duration until maturity of the gilt, (unless a gilt is index linked to inflation); while the coupon rate is fixed, the yields will change inversely to the price of gilts i.e., a rise in the price of a gilt will mean that its yield will fall.

HRA: housing revenue account.

MPC: the Monetary Policy Committee is a committee of the Bank of England, which meets for one and a half days, eight times a year, to determine monetary policy by setting the official interest rate in the United Kingdom, (the Bank of England Base Rate, commonly called Bank Rate), and by making decisions on quantitative easing/tightening.

MRP: minimum revenue provision - a statutory annual minimum revenue charge to reduce the total outstanding CFR, (the total indebtedness of a local authority).

PFI: Private Finance Initiative – capital expenditure financed by the private sector i.e., not by direct borrowing by a local authority.

PWLB: Public Works Loan Board – this is the part of H.M. Treasury which provides loans to local authorities to finance capital expenditure.

RPI: the Retail Price Index is a measure of inflation that measures the change in the cost of a representative sample of retail goods and services. It was the UK standard for measurement of inflation until the UK changed to using the EU standard measure of inflation – Consumer Price Index. The main differences between RPI and CPI is in the way that housing costs are treated and that the former is an arithmetical mean whereas the latter is a geometric mean. RPI is often higher than CPI for these reasons.

SONIA: the Sterling Overnight Index Average. Generally, a set of indices for those benchmarking their investments. The benchmarking options include using a forward-looking (term) set of reference rates and/or a backward-looking set of reference rates that reflect the investment yield curve at the time an investment decision was taken.

TMSS: the annual treasury management strategy statement reports that all local authorities are required to submit for approval by the Full Council before the start of each financial year.