

## SURREY COUNTY COUNCIL

## CABINET

DATE: 29 NOVEMBER 2022



REPORT OF CABINET MEMBER: SINEAD MOONEY, CABINET MEMBER FOR CHILDREN AND FAMILIES

LEAD OFFICER: RACHAEL WARDELL, EXECUTIVE DIRECTOR FOR CHILDREN FAMILIES AND LIFELONG LEARNING

SUBJECT: SURREY HOMES FOR SURREY CHILDREN: A STRATEGIC APPROACH TO GROWING CAPACITY IN CHILDREN'S HOMES IN SURREY

ORGANISATION STRATEGY PRIORITY AREA: GROWING A SUSTAINABLE ECONOMY SO EVERYONE CAN BENEFIT / TACKLING HEALTH INEQUALITY / ENABLING A GREENER FUTURE / EMPOWERING COMMUNITIES

<b>Purpose of the Report:</b>
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To seek endorsement of proposals to use Surrey County Council (SCC) capital funding to grow the capacity of children's homes in Surrey, enabling more looked after children to live closer to the communities they are from. This directly supports the priorities and ambitions set out in the Council's Looked After Children and Care Leaver Sufficiency Strategy 2020-2025, including creating Surrey homes for Surrey children.

Alongside this we are seeking Cabinet endorsement of a long-term strategic aim for the Council that every looked after child has a choice to remain in Surrey, where this is appropriate to their needs – as previously endorsed by the Corporate Parenting Board.

Lastly, Cabinet is asked to note the update included in the report about our work to date to deliver our Sufficiency Strategy, including the progress we have made so far and the areas we need to focus on as we move forward.

The development of Surrey homes for Surrey children contributes to all four of our Organisation Strategy priorities:

- **Growing a sustainable economy so everyone can benefit:** Investing in children's homes in Surrey ensures funding for this provision is spent within local communities, as well as creating locally based employment opportunities.
- **Tackling health inequality:** Looked after children often experience worse health outcomes than their peers. Living in a Surrey home enables a child to access well-coordinated and holistic multi-agency support, to enable improved outcomes.
- **Enabling a greener future:** When looked after children are placed out of county, this generates additional travel for children themselves, their families and the professionals who support them. The opportunity to build new children's homes and improve existing facilities also enables us to make changes that reduce the carbon footprint of accommodation.
- **Empowering communities:** When looked after children are enabled to live locally, they themselves are enabled to contribute to and enrich our local communities across Surrey.

## Recommendations:

It is recommended that Cabinet:

1. Endorse the long-term strategic ambition for SCC that every looked after child has a choice to remain in Surrey, where this is appropriate to their needs – as previously endorsed by the Surrey Corporate Parenting Board.
2. In support of the above ambition and delivery of SCC's Looked After Children and Care Leaver Sufficiency Strategy 2020-25:
  - a. Endorse an overall plan to create up to 30 additional beds in Children's Homes across a number of sites in Surrey (noting this may be revised by decision of the Executive Director for Children, Families and Lifelong Learning in consultation with the Cabinet Member for Children, Young People and Families), with care to be delivered either directly by SCC in-house and/or in partnership with trusted external providers
  - b. Approve the allocation of up to £18 million capital funding towards the creation of up to 24 of these beds in new Children's Homes, reallocated from £30 million previously allocated for the delivery of 150 beds of Care Leaver Accommodation by Cabinet on 23 February 2021.
    - i. Approve the allocation of £3.5 million from this £18 million to provide a second children's home in the Woking area (as detailed in this report). This will deliver not only a much-needed increase in local capacity, but also provide decant for residents of another SCC children's home (SC040633), so that essential improvement works can be undertaken to secure the home's long-term future for Surrey's looked after children.
  - c. In addition, approve allocation of up to £5 million from the overall £30 million for additional costs associated with five capital projects that are already in development in Surrey (as set out in the main body of the report).
  - d. Note that a bid has been submitted to DfE for £839k funding to support a further Surrey children's home which is in the early stages of development.
  - e. Confirm that (in line with the recommendation previously agreed by Cabinet on 23 February 2021) the Executive Director – Children, Young People and Families is given delegated authority to approve individual schemes within overall budget constraints in consultation with:
    - Cabinet Member for Children and Families
    - Cabinet Member for Education and Learning
    - Deputy Chief Executive
    - Cabinet Member for Finance and Resources

In addition, all specific proposals will be reviewed by Corporate Programme Panel.

## Reason for Recommendations:

SCC, as corporate parent, is committed to enabling the best possible outcomes for Surrey's looked after children, within the resources it has available. Alongside this moral imperative, we also have a clear statutory duty to ensure, as far as reasonably practicable, that there is sufficient accommodation for looked after children that meets their needs and is within their

local authority (LA) area (Children Act 1989, Section 22G). Whilst SCC is already taking concrete steps to deliver this duty and enable positive outcomes, these proposals are an important part of how we plan to take forward the delivery of our statutory Looked After Children and Care Leaver Sufficiency Strategy 2020-25, which includes the ambition to create Surrey homes for Surrey Children.

These proposals also have wider benefits in support of Surrey's four Organisation Strategy priorities, as set out above: growing a sustainable economy so everyone can benefit; tackling health inequality; enabling a greener future; and empowering communities.

## Executive Summary:

### Our operating context

1. As a Council, we are ambitious for our looked after children and want to enable them to achieve the best possible outcomes in their lives. The statutory sufficiency duty (Children Act 89) to secure accommodation in or near to Surrey plays a really important role in this, supporting children to remain connected to their communities and progress successfully towards independence, whilst also enabling us, as corporate parents, to provide coordinated and holistic support more easily – reducing, for example, the increased risks associated with exploitation for children in out of area placements<sup>1</sup>.
2. Our latest [Looked After Children and Care Leavers Sufficiency Strategy](#) states our ambition to enable greater access to “Surrey homes for Surrey children” – one of five key priorities. Aligned to this strategy, in October 2021 the Surrey Corporate Parenting Board endorsed the longer-term strategic ambition that “every looked after child has a choice to remain in Surrey, where this is appropriate to their needs”, with the working hypothesis that this would lead to around 80% of looked after children being able to live in Surrey. We are seeking Cabinet endorsement of this long-term ambition and in principle support for projects that help us to achieve it.
3. Enabling 80% of our looked after children to live in Surrey would make SCC one of the top-performing Councils in the country. Whilst we would not want to be limited by this ambition, we do believe this is an appropriate level to aim for, taking account of the fact that some looked after children will: live with their extended families who may be outside of Surrey; access accommodation that is close to their home community, but happens to fall outside the Surrey border; require very specialist support that may not be available locally; or face safeguarding risks that mean living out of area is the best option.
4. The proposals in this report to increase children's homes capacity in Surrey are just one part of SCC's comprehensive plans to achieve our long-term 80% sufficiency ambition, plans which are being overseen, coordinated, and resourced through SCC's Placement Value and Outcomes Transformation Programme. Achieving our overall ambition also requires growth in the capacity of local fostering and supported accommodation provision, as well as strengthening preventative work with families so that fewer children come into care and enabling more looked after children to return to their families or access alternative permanent, family arrangements. Development work is currently underway in all these areas. Focusing back on children's homes specifically, analysis

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<sup>1</sup> Looked after children: out of area, unregulated and unregistered accommodation (England), House of Commons Library, November 2021

undertaken through this programme has provided a clear picture of the current capacity of children's homes in Surrey and a strong understanding of how we need to grow provision locally to enable our longer-term sufficiency ambitions, as part of our overall sufficiency strategy. Additional analysis of our current operating context and position in terms of children's homes sufficiency is included in Annex 1.

5. It is important to note the reality that SCC faces an infrastructure deficit in terms of current children's homes capacity in Surrey, despite running 9 children's homes directly. To illustrate, there are 17 children's homes offering long-term placements in Surrey, which compares to 30 in West Sussex, 47 in Essex, 60 in Hampshire and 85 in Kent.
6. The significant challenges nationally in the market for Ofsted-regulated residential children's homes are widely acknowledged. These are clearly articulated in two high-profile national reviews published in 2022: the Children's Social Care Market Study from the Competition and Markets Authority; and the Independent Review of Children's Social Care. Issues highlighted include: a national lack of placements; excessive provider profits; increasing dominance of debt-backed private equity ownership (increasing the risk of disorderly provider failure); concerns over the quality of care in some homes; pressures on staffing and recruitment; and the limited influence that individual LAs can have on the wider provider market. These concerns resonate with the experiences of the many LAs known to SCC, who report unprecedented challenges with finding placements.
7. Geographically, Surrey's landlocked location near London feeds high competition for local beds – compounded by less provision overall in London and the South East. Alongside this, there are barriers to entry for new providers, due to high property prices and costs of living. Our strong children's services improvement journey, however, provides a firm foundation for us to grow sufficiency and our size as a large LA does present options which may not be open to smaller authorities.

#### **How many looked after children currently live in Surrey and what is our ambition?**

8. SCC has been making overall progress in the number of looked after children living in Surrey, although there remains more to do. In April 2022, there were 547 (51.6%) looked after children living in Surrey. This compares to: 514 (51.0%) in 2021; 495 (50.2%) in 2020; and 456 (46.8%) in 2019.
9. The latest available benchmarking data from April 2021 (noting that a slightly different statistical approach is used to calculate these figures) shows that 48.3% of Surrey's looked after children were placed out of county, which compares to a 40.4% average for South East (SE). The SE local authorities that had the lowest proportion placed out of county were Kent (15.9%), East Sussex (21.1%) and West Sussex (30.2%), if LAs with a population of less than 500 looked after children are excluded.
10. At present, looked after children requiring children's homes are more likely to live outside of Surrey than their peers, with 35 of 105 (34%) living in Surrey as of 17 October 2022. In addition, 14 of 15 looked after children in unregistered placements were living outside of Surrey, where the preference would have been for them to be in a regulated children's home in the county (see Annex 1 – paras. 9-18). Including these children means a total of 36 of 120 (30%) currently live in Surrey.

11. If our longer-term sufficiency ambition is for 80% of looked after children to live in Surrey, this would mean a shortfall of between 49 and 60 children living in Surrey-based children's homes using the 17 October 2022 position. Whilst these numbers fluctuate somewhat over time, we are planning based on needing 50-60 additional children to be living in children's homes in Surrey.
12. Modelling of future demand indicates that the number of children looked after by SCC will continue to grow overall (see Annex 1 – paras. 19-22), but with the actual number of children in children's homes holding relatively steady within this overall growth. Whilst this is positive, we are not expecting the number of children in children's homes to reduce. We are certain that children's homes will remain the right option for some children and young people who are looked after, even as we work to promote family settings first, use residential provision as a time-limited intervention rather than longer-term destination, and implement practice models that prevent entry to care for some.

### **How can this change be realised?**

13. We believe this capacity gap can be met through developing a strong mixed economy of provision, which includes both new SCC funded children's homes and partnership with external providers. To enable 50-60 children to be placed in children's homes in Surrey, our current planning assumption is that we will need achieve up to 70 additional beds in the county. Our plan to deliver this growth is to:
  - a. Create 30 additional beds using existing and the repurposed £18m SCC capital funding, with SCC managing these (first preference) or via strategic partnerships with trusted external providers.
  - b. Enable 10 additional looked after children to live in Surrey by maximising the use of existing children's homes capacity that is not currently occupied by SCC looked after children (see Annex 1 – paras. 4-5). This will be achieved through strengthened relationships with external providers in the county and strengthened practice and processes in-house.
  - c. Create a minimum of 30 additional children's home beds in the county by working with high-quality external providers who bring their own investment to establish provision (i.e. no SCC capital will be required).

We are planning on creating 70 beds to account for the fact that it is unlikely SCC will utilise 100% of the capacity that exists in children's homes in Surrey, due to: ensuring the individual needs of children can be met appropriately alongside others ("matching"); changes in staffing levels over time; other LAs placing in externally-run Surrey-based children's homes, with SCC not having preferential access despite being the host LA; and children from other LAs in Surrey-based homes may be settled in these homes.

14. We acknowledge that achieving this level of growth in capacity will require long-term commitment, focussed work and appropriate resourcing over time, but we are clear that this is the right ambition for Surrey's children and are confident we can achieve the level of change required over time.
15. The key steps to increase the capacity of external provision in Surrey are already underway, following Cabinet approval secured as part of the Annual Procurement Forward Plan to develop new block contracting arrangements, but we require additional

decisions from Cabinet to progress with further development of SCC-owned children's homes. This will be the focus of the remainder of this report.

### **What have we already been doing to grow children's homes capacity?**

16. Despite the challenges being experienced nationally and locally, we continue to be ambitious about what we can achieve for Surrey's children. Since February 2021, when Cabinet last considered proposals to build children's homes, we have been taking clear and concrete steps to strengthen our position in terms of children's homes sufficiency. This has been governed by our overall PVO Transformation Programme, which looks at all aspects of our sufficiency. These steps include:
- a. Undertaking an ambitious recruitment drive and investing in practice and process improvements across our 9 existing SCC-managed children's homes, to maximise the benefits of a recent service transformation;
  - b. Pressing ahead with planned capital projects – we are currently building or going through the planning application process to create 18 beds in SCC run children's homes. 7 of these beds represent genuine additional capacity, whilst 11 beds provide sustainable reprovision of longer-term placement capacity for children, following the closure of one older home and implementation of a new practice model (No Wrong Door) that focusses on preventing entry to care during 2022.
  - c. Strengthening relationships with existing Surrey-based providers, so that SCC are the LA of first choice when beds become available, as well as developing new contracting mechanisms that enable block booking of beds in local children's homes for Surrey children; and
  - d. Working closely with external providers looking to create provision in Surrey, with some initial success – including three new providers opening Surrey-based children's homes in 2021 and around 25 additional beds being planned by external providers at various stages of development.

### **What are our capital plans to develop SCC-owned homes in Surrey?**

17. In February 2021, SCC's Cabinet allocated £30 million of capital funding to create up to 150 additional beds of Care Leaver Accommodation in Surrey. The remainder of this report focusses on seeking Cabinet approval to reallocate a total of up to £23 million of this capital funding to a range of projects that increase the capacity of children's home provision in Surrey, as set out in paragraphs 19 to 23.
18. We are in a position to make this reallocation request due to the sustained progress we have made since February 2021 in growing the number of care leavers living in Surrey, from a historical baseline of around 40% to 55% in October 2022. At the same time as making this progress, the challenges associated with finding regulated children's home placements for looked after children have significantly increased for the reasons outlined in this paper.
19. The progress in relation to care leavers has been due to both improvements in practice (as reflected in the Council's latest ILACS Ofsted inspection) and successful work with a

responsive market of externally commissioned providers to create capacity in county (see Annex 1 for additional detail). This means we now have: 73 additional block contracted beds in supported accommodation for care leavers in the county; increased supply of quality assured care leaver accommodation for spot purchase; plans in place to commission up to a further 50 block contracted beds over the next 12 months; and work underway to use pre-allocated SCC capital to create up to an additional 24 beds in SCC-owned Houses of Multiple Occupation for care leavers over the next 18 months. This does not mean we will not be continuing to focus on enabling more care leavers to live in Surrey, but that we have confidence in our current plans to deliver.

20. The first reallocation request is for up to £5 million of additional capital to secure five approved capital projects that are already in delivery. These include: one children's home extension; 3 new build children's homes with a total of 18 beds (see para 14b above); and a new-build Family Contact Centre in Surrey, to support looked after children meeting with their birth families. Whilst the latter does not represent additional placement capacity, it both improves the potential for family reunification in future and strengthens the supporting infrastructure for children in local placements, which directly support our sufficiency ambitions. Capital budgets for these projects were approved during the 2020/21 financial year. Since then, delivery costs have increased significantly, due to a range of global and local factors (see Annex 2 for Land and Property Briefing) – an increase from £8.2 million to £13.2 million across the five projects. It is important to note that SCC has submitted a bid to the Department for Education Children's Homes Capital Fund 2023-24, seeking £839k capital funding associated with one new home. This would be offset against this £5 million capital if the bid is successful.
21. The second request to reallocate funding creates the authorisation for a further phase of capital development to deliver our Sufficiency Strategy. This requires reallocation of a further £18 million of capital to secure an additional 24 beds in Surrey children's homes, equating to £750k per bed space. A clear delegated decision route is set out as part of the report recommendations for specific projects within this overall budget. Specific proposals in relation to the locations of these additional beds have been developed, discussed and initially endorsed by the PVO Transformation Programme Board, and work continues to finalise these proposals, in parallel with the overall capital funding request to Cabinet.
22. In developing specific proposals for children's homes we have taken account of:
  - a. the geographic distribution of looked after children in and outside Surrey;
  - b. the profile of need of looked after children currently placed in residential provision in and outside of Surrey;
  - c. locations of current children's home run by SCC and external partners in Surrey, as well as their stated specialisms;
  - d. planned locations and specialisms of children's homes in development in Surrey, including SCC-owned and externally-run provision;
  - e. locations and specialisms of schools and education provision in the county and planned capital developments, by SCC or other providers, to ensure proposals for new children's homes are complementary;
  - f. the overall suitability in terms of community infrastructure of places in Surrey where further homes might be located; and
  - g. forecast future patterns in demand for beds in children's homes,

23. Our intention will be for these new homes to be managed by SCC in the first instance, but consideration will also be given to the potential for strategic partnerships with trusted and high-quality external providers.
24. The first new request, for which we are seeking Cabinet endorsement, is to allocate £3.5 million of the total £18 million to create an additional children's home in the Woking area. This will benefit Surrey's looked after children by increasing local capacity in children's homes in the long-term, whilst also enabling the residents of another SCC children's home (SC040633) to relocate in the short-term, so that essential major improvement works can be undertaken. This is required to secure the long-term future of the current home for Surrey children. This cost effective and time-efficient approach will result in a net-increase of 6-beds across the two homes. Our plan will be to:
- a. Establish a new Children's Home in the Woking area, following SCC's established 6 placement (4 plus 2) model
  - b. Relocate SC040633 residents to the new home
  - c. Carry-out major, essential improvement works at SC040633
  - d. Decide on completion whether it is in the best interests of the relocated residents to return to SC040633 or remain in the new home
  - e. Both homes remain open leading to an overall net-increase of 6 placements across the two homes.

### **What is the business case for this level of capital investment?**

25. As set out in this report, we will need 50-60 more of the children in our care to be living in residential provision in Surrey to achieve our ambitious longer-term aim to enable every looked after child to have the choice to remain in Surrey, where this is appropriate to their needs. Whilst we could look to do this through open development via the external provider market, we will enable the best outcomes for children and achieve the best value for money if additional children's homes that are owned and (if possible) managed by SCC are a central part of our sufficiency strategy. Maintaining and growing our own capacity within Surrey strengthens our negotiating position as a commissioner of externally provided residential provision.
26. First and foremost, the business case is around enabling the best outcomes for Surrey's looked after children. Supporting children to live in Surrey, close to the communities they are from, provides them with best possible chance of maintaining their social networks, mitigating against some of the potential negative impacts of being in care and preparing them for their future in the county. Surrey-based provision also enables SCC to: work with its local partners to provide the best possible, well-coordinated wrap-around support to children; have improved confidence in the quality of the provision children are accessing; and better plan pathways on from the provision into either a family-based or more independent setting.
27. Alongside improved outcomes for children, this proposal will also create revenue savings on the cost of placements made in externally run provision.

### **Conclusions**

28. The proposals set out in this report reflect our ambition as Corporate Parents to enable more looked after children who want to live in Surrey to stay close to the communities



that they are from and for every looked after child to have the choice to remain in Surrey, where this is appropriate to their needs. Achieving this change will have economic, health, environmental and community benefits for Surrey. Delivering this will require long-term commitment, focussed work and appropriate resourcing, but we are clear that this is the right ambition for Surrey's children and we can achieve the level of change required over time.

#### **Consultation:**

29. These proposals have been developed as part of the Council's Placement Value and Outcomes Transformation programme, with input from Children's Services, Children's Commissioning, Land and Property, and Finance.
30. SCC is actively engaging with external providers of regulated children's homes to develop the local market of provision in the county and recently completed market engagement survey to understand the relationship between the Council and our provider partners, and how we can further improve this.
31. The proposals in this report were considered by the Children, Families, Lifelong Learning and Culture Select Committee on 4 October 2022, who gave their support to the recommendations set out (noting for clarity that the £5 million additional funding for current capital projects was not considered). It is important to note that some specific changes and clarifications have been made to the recommendations set out for Cabinet, informed by the feedback from the Select Committee and work undertaken since the meeting to refine and finalise our proposals for Cabinet.

#### **Risk Management and Implications:**

32. Current budget pressures relating to Children's Social Care placements are £4.1m due to the number of children in placements and the provision available, with further risks also identified. Continued reliance on more expensive external residential placements will see this pressure continue unless the number of Looked After Children reduce, which as per paragraph 10 is not the expectation. Development of additional SCC capital funded homes helps to mitigate reliance on the external market and provides enhanced ability to contain future placement costs.
33. As of 17 October 2022, SCC had six children under the age of 16 placed in unregulated placements. These arrangements became unlawful following changes to legislation in September 2021. We continue to seek to place these children in Ofsted-regulated provision. These recent changes to legislation alongside the national capacity pressure for regulated placements mean that many local authorities, including SCC, currently find themselves obliged to make use of such placements (especially in response to short notice requirements) to ensure children can be accommodated safely. This reality carries financial, reputational and regulatory risk for the Council, but SCC mitigates these risks through: open and clear communication with Ofsted; enhanced quality assurance of and support arrangements for children in these placements; ongoing work with unregulated placement providers to encourage them to register with Ofsted, and become regulated wherever possible; and ongoing searches for alternative regulated provision. The development of additional children's homes, as set out in this report, reduces the likelihood of having to make unlawful placements in future. Additional information about SCC's use of unlawful placements and the measures that are in place to ensure children

in this accommodation continue to receive high-quality support are set out in Annex 1 (paras. 9-18).

34. Children's residential provision is a volatile sector facing many challenges. Expanding the number of children's homes that SCC directly manages itself does potentially increase the risks around ensuring regulatory compliance and the possible impact of negative Ofsted judgements, which could affect the stability of children's placements and the Council's reputation. These risks are being mitigated by extensive investment in staffing and strengthened practice and processes in SCC's current children's homes.
35. SCC currently places a high proportion of children who are looked after and requiring residential provision in locations outside of Surrey. Whilst a robust approach is taken to ensure children in these placements are safe and well supported, it is possible to have greater assurance of children's safety and improve coordination of support when provision is based locally.
36. During 2021, SCC was subject to a high-profile judicial review threat in relation to its fulfilment of its statutory sufficiency duty. Through this process SCC was able to demonstrate it was taking clear and concrete steps to improve the sufficiency of provision in the county, but the risk of future action is significantly reduced by maintaining effort to enable more looked after children to live in Surrey. SCC's recent progress in this area was validated during the Ofsted ILACS inspection in January 2022. Inspectors highlighted "A comprehensive sufficiency strategy is being implemented. The strategy is based on a detailed understanding of the gap between identified needs and resources."
37. It is a challenging time to plan and deliver capital projects, for the reasons discussed in this report, with risk that costs may increase during planned projects. We will mitigate this risk through careful planning and appropriate contingency planning, but we also acknowledge that if construction costs do continue to rise, we may need to prioritise the projects that are taken forward within the existing financial envelope.
38. As highlighted in para. 5, recruitment is a national challenge facing the regulated Children's Home market. This means there are risks associated with recruiting sufficient appropriately trained staff to enable the delivery of new children's homes. To mitigate this risk, we are actively investing in and exploring further improvements to our recruitment, retention and training and development offer to staff in SCC homes – in part enabled by funding through the PVO Transformation Programme. There have been demonstrable increases in recruitment during 2022, associated with implementation of our recent children's homes transformation. The continuation of transformation funding in 2023/24 will support ongoing mitigation of this risk. In addition, the ability to consider working in strategic partnership with external providers to manage SCC-owned homes, provides a contingency option should SCC struggle in terms of recruitment at scale.

#### **Financial and Value for Money Implications:**

39. SCC currently has a total capital budget of £39.6 million associated with development of children's homes and care leaver accommodation. It is proposed that the suite of currently planned care leaver and children's homes projects are delivered within this financial envelope. It is important to acknowledge this may require prioritisation of the current pipeline of planned initiatives, particularly given current cost pressures being experienced in the construction sector. Given the progress that SCC continues to make in relation to the number of care leavers being supported to live in Surrey, it is proposed

that projects focussed on care leaver accommodation are deprioritised or delayed to enable projects growing the capacity of children's homes in the county, whilst continuing to explore other ways to develop care leaver accommodation that maximise available capital – perhaps working with local partners or exploring innovative models of delivery that are less reliant on capital expenditure.

40. Alongside improved outcomes, this proposal will also create revenue savings on the cost of placements made in externally run provision. Based on the transformed model of SCC-managed Children's Homes, approved by Cabinet in November 2021, the average weekly cost of a placement in an SCC-managed children's home ranges from £3,177 to £4,294. This compares to an average weekly cost of residential provision from the open market of £5,232 per week (as in July 2022). For provision for children with disabilities (CWD), the cost differential is less, with the SCC cost sitting at £5,194 compared to £5,639 on average on the open market. To illustrate, if we created 24 additional beds (8 of which were CWD) with £18 million capital investment and achieved 90% occupancy over the course of the year, we would realise a revenue efficiency of £1.2 million each year (using a midpoint average cost for in-house). If any children who access the provision were previously in unlawful placements, then the cost containment for SCC is significantly greater still. This does not include any associated borrowing costs for the budget already within the MTFS.
41. Whilst we are confident of revenue benefits to the Council of the approach above, it is noted that appropriate revenue budget planning will be required as part of the next phase of the work, including further consideration of additional costs to Land and Property and staffing budgets resulting from any growth in the number of children's homes in Surrey (noting these costs are included in the revenue costs above) – which we expect to offset through reduced spend on external placements.

**Section 151 Officer Commentary:**

42. Although significant progress has been made to improve the Council's financial position, the financial environment remains challenging. The UK is experiencing the highest levels of inflation for decades, putting significant pressure on the cost of delivering our services. Coupled with continued increasing demand and fixed Government funding this requires an increased focus on financial management to ensure we can continue to deliver services within available funding. In addition to these immediate challenges, the medium-term financial outlook beyond 2022/23 remains uncertain. With no clarity on central government funding in the medium term, our working assumption is that financial resources will continue to be constrained, as they have been for the majority of the past decade. This places an onus on the Council to continue to consider issues of financial sustainability as a priority in order to ensure stable provision of services in the medium term.
43. As such, the Section 151 Officer supports the proposal to grow capacity within Surrey children's homes as part of the strategy to manage the financial pressures in this area.

**Legal Implications – Monitoring Officer:**

44. Under the Children Act 1989, Surrey County Council has a statutory duty to provide sufficient accommodation within the authority's area that meets the needs of the children.

45. The council's responsibilities are further strengthened by the Children Act 2004 to promote safeguarding and welfare of children.
46. All children's homes have to be registered with Ofsted under the Care Standards Act 2000, and are inspected and regulated by Ofsted against the Children's Homes (England) Regulations 2005 which sets out the requirement for leadership and management and staffing of the homes in accordance with its stated purpose:

### 23.1. Regulation 13

- "13. (1) The leadership and management standard is that the registered person enables, inspires and leads a culture in relation to the children's home that—
- (a) helps children aspire to fulfil their potential; and
  - (b) promotes their welfare.
- (2) In particular, the standard in paragraph (1) requires the registered person to—
- (a) lead and manage the home in a way that is consistent with the approach and ethos, and delivers the outcomes, set out in the home's statement of purpose;
  - (b) ensure that staff work as a team where appropriate;
  - (c) ensure that staff have the experience, qualifications and skills to meet the needs of each child;
  - (d) ensure that the home has sufficient staff to provide care for each child;
  - (e) ensure that the home's workforce provides continuity of care to each child;
  - (f) understand the impact that the quality of care provided in the home is having on the progress and experiences of each child and use this understanding to inform the development of the quality of care provided in the home;
  - (g) demonstrate that practice in the home is informed and improved by taking into account and acting on—
    - (i) research and developments in relation to the ways in which the needs of children are best met; and
    - (ii) feedback on the experiences of children, including complaints received; and
  - (h) use monitoring and review systems to make continuous improvements in the quality of care provided in the home.

47. Legal Services will provide such assistance as is required in respect of the capital project works.

### **Equalities and Diversity:**

48. The proposed schemes will have positive benefits for Looked After Children up to the age of 17, enabling more children to live in or close to the communities they are from. This will also enable SCC to deliver more coordinated and holistic multi-agency support, contributing to better outcomes.
49. Some looked after children have special educational needs and disabilities that mean they may require specialist support and end up being placed at distance to access this.

The proposals covered by this report will include increased provision for these children locally, with similar benefit to those listed under para. 45.

50. If looked after children are supported to live in children’s homes locally, this also supports them to remain living in Surrey when they become care leavers, should they so wish – including best practice guidance around children “staying close” to their children’s homes and strengthening their ability to access local housing through district and borough councils.

**Other Implications:**

51. The potential implications for the following Council priorities and policy areas have been considered. Where the impact is potentially significant a summary of the issues is set out in detail below.

<b>Area assessed:</b>	<b>Direct Implications:</b>
Corporate Parenting/Looked After Children	The proposals in this report are directly focussed on improving outcomes for Looked After Children, by enabling more to live in homes closer to the communities they are from. This is directly connected to our statutory duties in relation to Corporate Parenting and sufficiency of accommodation, as well supporting the implementation of our Looked After Children and Care Leaver Sufficiency Strategy 2020-25.
Safeguarding responsibilities for vulnerable children and adults	The development of children’s homes in Surrey directly supports our safeguarding responsibilities for looked after children. By accommodating more children in Surrey we are able to better quality assure provision and enable improved collaborative, multi-agency working to strengthen their safety and outcomes.
Environmental sustainability	There are significant opportunities to make a positive impact on environmental sustainability connected to these proposals. This relates to the ability to reduce travel associated with supporting looked after children placed at distance from Surrey and opportunities from the chance to build new and/or renovate existing children’s homes so that higher environmental standards are met.  The new facilities will be designed and constructed in line with the latest building regulations to maximise energy efficient.
Compliance against net-zero emissions target and future climate compatibility/resilience	There is clear commitment within these proposals to minimise carbon emissions associated with any additional new-build children’s homes, working in partnership with the Greener Futures Team to review current plans and scrutinise future proposals as they are brought forward. The ambition will be to get as close to net-zero emissions as possible for new-build and renovation projects, within capital constraints, ensuring we balance the Council’s carbon reduction

	ambitions with the need to fulfil core statutory duties relating to looked after children.
Public Health	Research shows looked after children have poorer health outcomes than their peers. This proposal enables them to stay close to Surrey and benefit from health and public health initiatives delivered by the Council.

### What Happens Next:

52. The key next steps are:

- a. Ensure delivery of 5 capital projects that are currently in delivery within currently planned timescales (final project completed by April 2024) and within revised budget envelope set out in this paper.
- b. Establish capital programme structure with Land and Property to take forward the proposed new phase of capital development relating to children's homes and care leaver accommodation by January 2023.
- c. As part of the above, ensure a clear stakeholder engagement and communications plan is established to cover planned developments undertaken as part of the next phase of this programme by January 2023.
- d. Bring forward a suite of specific proposals for delegated decisions by the Executive Director for Children, Families and Lifelong Learning in consultation with the colleagues identified in this report, during 2023.
- e. Confirm ongoing revenue resource requirements associated with new homes, in parallel to planned capital developments, in line with timescales required by SCC budget planning processes, during 2023.

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### Annexes:

Annex 1: Surrey Children's Homes – Supporting Analysis

Annex 2: Land and Property Cabinet Briefing

Annex 3: Environmental Sustainability Assessment

Annex 4: Equality Impact Assessment

**Sources/background papers:**

Surrey homes for Surrey Children: A strategic approach to growing capacity in Children's homes in Surrey, SCC CFLLC Select Committee, 4 October 2022

Independent Review of Children's Social Care, 23 May 2022

Children's Social Care Market Study, Competition and Markets Authority (CMA), 10 March 2022

Transformation of Surrey Children's Residential Services, SCC Cabinet, 30 November 2021

Looked after children: out of area, unregulated and unregistered accommodation (England), House of Commons Library, November 2021

Delivery of Care Leaver Accommodation and Children's Homes, SCC Cabinet, 23 February 2021

Looked After Children Property Projects – New Children's Homes and Shaw Family Centre, SCC Cabinet, 21 July 2020

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## Annex 1: Surrey Children’s Homes - Supporting Analysis

### How many looked after children currently live in Surrey?

1. Table 1 shows the proportion of looked after children in Surrey in April 2022, compared to previous years.

Date	%	Number	Milestone description
April 2022	51.6	547	Current position
April 2021	51.0	514	Start of PVO Transformation Programme
April 2020	50.2	495	Launch of latest Sufficiency Strategy
April 2019	46.8	456	Baseline

2. At present, looked after children requiring children’s homes are more likely to live outside of Surrey than their peers, with 35 of 105 (34%) living in Surrey as of 3 October 2022. In addition, 15 of 16 looked after children in unregulated placements were living outside of Surrey, where the preference would have been for them to be in a regulated children’s home. Including these children means a total of 36 of 124 (30%) currently live in Surrey.
3. If our longer-term sufficiency ambition is for 80% of looked after children to live in Surrey, this would mean a shortfall of between 49 and 61 children living in Surrey-based children’s homes using the 1 October 2022 position. Whilst these numbers fluctuate over time, we are planning on the basis of 50-60 additional children to be living in children’s homes in Surrey.

### Capacity of Children’s homes in Surrey

4. In terms of Surrey’s current capacity for longer-term placements in the county, there are 28 beds available across 9 children’s homes run by SCC and 26 available across 6 children’s homes run by external providers. This figure excludes 12 registered beds in 2 providers in Surrey that provide very specialist services focussed solely on young people with sexually harmful behaviours, as well as two children’s homes that exclusively offer short-term respite, but includes the 15 beds that external providers opened across three homes in Surrey during 2021. This leads to a notional current capacity of 54 in Surrey, although the following considerations are important to bear in mind:
  - a. children’s homes often operate below their registered 100% capacity at any point in time, due to considerations such as ensuring the specific needs of children placed in their care are met and their current staffing levels; and
  - b. SCC has no priority access to local homes in the area, with other local authorities able to refer into the provision – all providers in Surrey currently have some children from other local authorities placed in their provision, whose placements may – if stable - last for several years.



5. Whilst there definitely is potential to grow SCC's use of the residential provision that already exists in Surrey, alongside a number of external providers already planning to create new provision in the county over the months ahead, it is clear that we will not be able to achieve our longer-term sufficiency ambitions simply by maximising the use of the 54 existing beds in county and will, in reality, need to plan towards around double the current capacity.

### **Our local and national context**

6. Surrey is starting from a low base in terms of children's homes in Surrey, despite having a relatively strong footprint of 9 children's homes run by SCC. For example, there are 17 children's homes offering long-term placements in Surrey, which compares to 30 in West Sussex, 47 in Essex, 60 in Hampshire and 85 in Kent.
7. There are significant challenges nationally in the market for Ofsted-regulated residential children's homes and foster care, which have been attracting substantial media attention during 2022. This has been fuelled by two high-profile national reviews: Children's Social Care Market Study published by the Competition and Markets Authority (CMA) in March 2022; and the Independent Review of Children's Social Care published in May 2022. In particular, these reviews highlighted:
  - c. national concerns around placement availability;
  - d. excessive provider profits;
  - e. increasing dominance of debt-backed private equity ownership (increasing the risk of disorderly provider failure);
  - f. concerns over the quality of care in some homes;
  - g. pressures on staffing and recruitment; and
  - h. the limited influence that individual local authorities can have on the wider provider market.
8. In addition to national reports, SCC is in touch with many local authorities across the country who all describe the unprecedented challenges currently with finding regulated placements for children.

### **Use of unlawful and unregistered placements and quality assurance**

9. The lack of sufficient placements nationally, but particularly in London and the South East, has resulted in growing use of unregulated supported accommodation by local authorities. Following a legislative change in September 2021, it is now unlawful to place children under the age of 16 in unregulated placements where care is typically not provided – whereas previously this was legally permitted where this was the best available option for a child. Many local authorities, including Surrey, nevertheless find themselves obliged to make such placements (especially in response to short notice requirements) to ensure children can be accommodated safely. For children in these placements, an appropriate level of care is commissioned to meet their needs on top of the support typically provided for young people over 16 in supported accommodation.
10. As of 17 October 2022, there were six SCC looked after children aged under 16 in "unlawful" placements. This accommodation is only used when absolutely necessary, where it has not been possible to identify a regulated placement, and all these

arrangements have been authorised by the Director of Corporate Parenting. Active and sustained placement searches continue for all these children, to try and secure alternative provision where Ofsted-regulated care can be provided, as rapidly as possible. Running parallel to placement searches, unregulated providers who are now providing care for children as part of delivering these placements are being encouraged and supported to apply for Ofsted registration, so they can be regulated as a children's home, with a 'fast track' process available for providers.

11. Whilst unregulated supported accommodation is not currently subject to national Ofsted regulation and inspection, this does not mean it is not quality assured. SCC holds responsibility for quality assuring all unregulated provision where it places looked after children and takes this responsibility extremely seriously, especially so where this relates to children aged under 16. Overall, for supported accommodation, the Gateway to Resources (GtR) Review Team are responsible for quality assurance of providers. This includes at least annual quality assurance visits. SCC's own quality assurance is complemented and enhanced by regional collaboration with other Local Authorities. Key networks in this regard include the Children's Cross Regional Arrangements Group (CCRAG), through which SCC works actively with other LAs to share quality assurance information about unregulated providers, and the Commissioning Alliance, which SCC joined in September 2021 and now provides access to formally quality accredited supported accommodation provision for Surrey's children and young people, alongside additional information sharing between LAs and centralised contract management of Commissioning Alliance providers.
12. When we are considering placing a child under 16 in unregulated provision these overall arrangements are significantly strengthened. This starts with an initial due diligence visit prior to any child being placed in a provision where we have not previously placed a child. In the majority of cases this will be done in person, but occasionally (for example, when there is an urgent need to take up the placement or has been a recent visit to the provider) this may be done virtually and then followed up with an in-person visit soon after. This visit ensures that:
  - i. the standard of accommodation is good enough;
  - j. the provider can evidence adherence with safer recruitment practices; and
  - k. the provider can demonstrate how they ensure they work effectively with young people – for example providing evidence of training for staff, and how improved outcomes for young people are enabled and monitored.
13. At the time of making the placement, conversations are held between the child's social worker and the placement provider to ensure they can meet the child's specific needs. This provides assurance about the suitability of the match between provider and child. This sits alongside strong, ongoing work within our Independent Reviewing Officer (IRO) service, which reviews and scrutinises the care plans for all looked after children.
14. Once the child has moved in, a member of the GtR Review Team visits the accommodation on a weekly basis. As the child becomes settled, frequency of visits by GtR Review Team may reduce to bi-weekly, or we may alternate virtual and in-

person visits. At the time of submitting this report, for the children currently in unlawful placements, 3 are receiving fortnightly visits that alternate between virtual and in person. 2 are receiving weekly visits that alternate between virtual and in person. In the case of all current unlawful placements, regular contact between the child and their social worker is being maintained, to ensure their needs are being met.

15. Lastly, child-level oversight of all unlawful placements is undertaken by the Children's, Families and Lifelong Learning Leadership Team, supported by detailed weekly reporting. Specifically, in compiling this report, the Director for Corporate Parenting has confirmed that the assurance steps outlined have been taken in respect of all children currently in a placement of this type and that she regularly reviews placements as they continue, requesting updates from GtR where necessary.
16. In contrast to under-16s, SCC is legally able to place children aged 16-17 in unregulated supported accommodation. Within this cohort, as of 17 October 2022, there were however 9 young people whom SCC had identified as being in "unregistered" placements. This covers those in supported accommodation whose needs require some elements of "care" (as examples: support to meet health needs; or manage finances), not just "support", who would ideally be placed in provision registered with Ofsted. If an unregulated provider is deemed to be providing care in addition to support for 16-17 year olds, Ofsted, as the regulator, can take enforcement action against the provider, so again SCC would either be continuing to seek alternative regulated provision wherever possible or ensuring there is a plan for a step-down in the level of support over time so that "care" is no longer being provided.
17. For all children in unlawful and unregistered placements a review meeting is held every fortnight. This is attended by the Head of Service for GtR. A decision is made at this meeting as to whether the visiting schedule needs to remain at the current interval or whether it is appropriate to lengthen the time between visits. The decision making is predicated upon length of time in placement, needs of the child and how the provider is meeting those needs.
18. Children in both "unlawful" and "unregistered" placements would be in some form of regulated, residential provision (including residential education), if there were sufficient, appropriate capacity available. This means they are taken into consideration in terms of our children's home sufficiency planning.

### **What are we forecasting in terms of future demand?**

19. Our current demand modelling done by SCC data analysts suggests that the number of children looked after by SCC will continue to grow. In April 2020, our population of looked after children was 984, in April 2021 it was 1,001 and in April 2022 it was 1,058 – growth of 7.5% across the period. Whilst there have been some initial signs that the growth in numbers of looked after children who are not unaccompanied asylum-seeking children (UASC) may be flattening, this is being more than offset by increasing numbers of UASC arriving in Surrey. As a result, the midpoint of the

current forecast would still see us reaching: 1,084 looked after children by April 2023; 1,122 by April 2024; and 1,158 by April 2025.

20. To ensure our approach to demand modelling is robust, we have also commissioned an external provider to develop a complementary demand forecast, using a different statistical approach. This learns from data about the profile and journeys taken by Surrey's looked after children over the last 11 years and plots the likely future journeys of children currently in the system, alongside future joiners. Despite the different methodologies, these trends suggest a similar level of growth over the next three years – so we have a reasonable degree of confidence in the numbers presented above.
21. It is important to note that, in addition to the trends set out here, on 25 August 2022, changes were announced to the National Transfer Scheme, which is the mechanism by which UASC are fairly distributed between local authorities across the country. This increased the cap in the number of UASC that local authorities are required to accommodate from 0.07% of the 0-18 population to 0.1%. At the time of writing this report, the implications of this change are still being assessed – but it is likely to mean additional growth in the number of looked after children in Surrey over the coming months, on top of that currently reflected in the forecasts described in this report.
22. Despite this context of overall growth, our forecasts for children who will require children's homes are holding relatively steady – with the midpoint forecast at around 115 children through to April 2025 based on current trends. Although it is early days, this perhaps reflects positively on the initial impact of efforts to promote family settings first, including developing our work to enable children to “step-down” from children's homes back to families and newer practice models, such as No Wrong Door and Family Safeguarding. Whilst the cohort in children's homes is forecast to hold steady over time in a context of overall growth, it is important to note that we are not forecasting reductions in the actual numbers of children needing this type of living arrangement.

### **Why have the numbers of care leavers in Surrey improved?**

23. Since February 2021 (when the relevant Cabinet approval was given to invest £30 million of capital to create 150 beds of care leaver accommodation in Surrey) the number and proportion of care leavers living in Surrey has improved significantly. As of 20 October 2022, there were 838 care leavers open to SCC. Of these 471 young people (56%) were living in Surrey. This compares to 44% in February 2021 and a historical level of around 40% going back to early 2020.
24. The progress in relation to care leavers now living in Surrey has been due to both improvements in practice (as reflected in the Council's latest ILACS Ofsted inspection) and successful work with a responsive market of externally commissioned providers to create capacity in county. With regards to the latter, in September 2021 SCC joined the Commissioning Alliance Dynamic Purchasing Vehicle for Semi-Independent Accommodation and Support, a collaborative commissioning arrangement between Local Authorities. During October and

November 2021 we then retendered block contracts for supported accommodation for care leavers. This process created 73 additional block booked beds in Surrey, alongside improving access to additional quality assured spot purchase accommodation options. To strengthen this further, an additional mini-competition is now underway to secure up to an additional 50 beds and we are working with Land and Property to secure up to an additional 24 beds in House of Multiple Occupation for care leavers, using SCC capital.

### **What is the business case for this level of capital investment?**

25. As set out in the above report, we have already established that we will need 50-60 additional children to be living in residential provision in Surrey to achieve our ambitious longer-term aim to enable every looked after child to have the choice to remain in Surrey, where this is appropriate to their needs. Whilst we could look to do this through open development via the external provider market, we will enable the best outcomes for children and achieve the best value for money if additional children's homes that are owned and (if possible) managed by SCC are a central part of our sufficiency strategy, in support of our statutory duties. Maintaining some capacity within the broader market strengthens our negotiating position as a commissioner of externally provided residential provision.
26. First and foremost, the business case is around enabling the best outcomes for Surrey's looked after children. Supporting children to live in Surrey, close to the communities they are from, provides them with best possible chance of maintaining their social networks, mitigating against some of the potential negative impacts of being in care and preparing them for their future in the county. Surrey-based provision also enables SCC to: work with its local partners to provide the best possible, well-coordinated wrap-around support to children; have improved confidence in the quality of the provision children are accessing; and better plan pathways on from the provision into either a family-based or more independent setting.
27. In addition to improved outcomes, this proposal will also create revenue savings on the cost of placements made in externally run provision. Based on the transformed model of SCC-managed Children's Homes, approved by Cabinet in November 2021, the average weekly cost of a placement in an SCC-managed children's home ranges from £3,177 to £4,294. This compares to an average weekly cost of residential provision from the open market of £5,232 per week (as in July 2022). For provision for children with disabilities (CWD), the cost differential is less, with the SCC cost sitting at £5,194 compared to £5,639 on average on the open market. To illustrate, if we created 24 additional beds (8 of which were CWD) with £18 million capital investment and achieved 90% occupancy over the course of the year, we would realise a revenue efficiency of £1.2 million each year (using a midpoint average cost for in-house).
28. SCC is ambitious to enable more looked after children who want to live in Surrey to stay close to the communities that they are from and would like every looked after child to have the choice to remain in Surrey, where this is appropriate to their needs. This will require long-term commitment, focussed work and appropriate resourcing,

but we are clear that this is the right ambition for Surrey's children and we can achieve the level of change required over time.

29. We are facing a challenging national and local context in terms of the pressures on the market for Ofsted registered placements for looked after children, driven by rising numbers of looked after children nationally and regulatory change. This context means we need to consider proactive options that enable us to create local provision and manage some of the risks associated with the challenging national picture.

## Annex 2: Land and Property Cabinet Briefing

### Children, Families and Learning

#### Looked After Children Programme – Financial Update for Cabinet

The below table sets out the comparative financial forecast of the LAC programme versus the original budgets approved, to support the Cabinet request for financial uplift.

<b>Scheme Name</b>	<b>Approved Budget</b>	<b>Forecasted Spend</b>	<b>Variance</b>
Children's Home 1	£1,800,000	£2,496,340	<b>£696,340</b>
Children's Home 2	£1,900,000	£2,952,627	<b>£1,052,627</b>
Family Contact Centre	£1,800,000	£3,449,439	<b>£1,649,439</b>
Children's Home 3	£2,200,000	£3,106,835	<b>£906,835</b>
SC405933 Kitchen Extension and Internal Remodel	£500,000	£1,235,439	<b>£735,439</b>

(NB: The above forecasted figure includes the latest forecasted construction figures from the professional team, and includes a 5% contingency)

#### Summary of cost increases across all projects

- Costs incurred through the development of the design and Employer's Requirements for each of the schemes, through RIBA Stage 1 to RIBA Stage 4, previously undefined
- Circa 15% inflation on the tender price from February 2021 to October 2022
- Further impacts have been felt as a result of isolated material supply cost increases (largely due to BREXIT and COVID-19), increasing energy costs, and the Russian invasion of Ukraine. Key items affected include concrete, steel, plasterboard, amongst others
- Client Variations to the Project Brief/scope following requests from the Service e.g., Anti-Ligature requirements and additional security/access control measures
- Programme delays and associated prolongation costs e.g., Planning Authority delays in determining applications for discharge of planning conditions
- Unforeseen costs due to poor ground conditions (contamination, poor bearing capacity), obstructions and the like (SCC's risk under the Building Contracts)
- Costs associated with diverting existing utility services, following detailed surveys and trial pits
- Costs for new utility services exceeding original budget allowances

A significant proportion of the increase in costs is due to unforeseen large inflationary increases and rising labour and material costs because of shortages and delays experienced following the UK's departure from the EU, COVID and the war in Ukraine. The Construction sector is experiencing unprecedented cost inflation across materials, labour and transport. Contingencies in budgeting while thought adequate at the time of inception of the projects, proved inadequate in this instance.

**Prepared by:** Lee Fifer – Assistant Project Manager, Capital Delivery, Land and Property

**Reviewed by:** Pasqualina Puglisi – Contracts Manager, Capital Delivery, Land and Property  
17/10/2022

### Annex 3: Environmental Sustainability Assessment (ESA)

Area	Relevant Topic Y/N	Issue	Possible Action	Taken forward?
Designated sites, protected species and biodiversity  Resilience to risks posed to the environment by service delivery	Y  N	Appropriate environmental investigation will be undertaken to confirm that there are no issues as and when sites are identified	Further environmental assessments will be carried out as part of the development and planning processes	
Materials and water Energy Waste	Y Y Y	Energy use and waste will be components identified as any schemes progress	Surrey County Council's design philosophy is to create buildings that will support low energy consumption, reduce solar gain and promote natural ventilation. Any new infrastructure developed will be built to the local planning authority's adopted core planning strategy.	
Transport	Y	Delivery of construction projects does involve an amount of travel for labour, and delivery of materials. Air Quality Management Area not yet identified	This will be considered as part of the procurement process for any projects under this programme	
Landscape and trees  Heritage Education / raising awareness	Y  N N	Any designs will be worked up to retain as many existing trees on sites as possible. This will be subject to final agreement at planning stage.	Arboricultural surveys will be carried out on any sites identified to identify the potential issues. Discussions will be carried out with the Council's Arboricultural Officer to identify the least impactful solution and potential remediation measures as required.	