



Seaford Town Council

Seaford Town Council Full Council Agenda – 23 October 2025

To the Members of the Full Council

Councillors S Adeniji, S Ali, L Boorman, C Bristow, R Buchanan, S Dubas, S Dunn, F Hoareau, O Honeyman, R Honeyman, J Lord, S Markwell, O Matthews, J Meek, G Rutland, L Stirton, R Stirton, I Taylor, L Wallraven and M Wearmouth

A meeting of the **Full Council** will be held at **The View, Seaford Head Golf Course, Southdown Road, Seaford, BN25 4JS** on **Thursday, 23 October 2025 at 7.00pm**, which you are summoned to attend.

Steve Quayle,
Town Clerk

17 October 2025

PLEASE NOTE:

- **Public arrival time is from 6.45pm ready for a 7pm meeting start**
- **The meeting will be recorded and uploaded to the Town Council's YouTube channel shortly after the meeting**
- **See the end of the agenda for further details of public access and participation**
- **Councillor queries on agenda items should be reserved for the meeting so the answer and any subsequent points are shared with all councillors. If however a councillor has a question that officers may need to know in advance to prepare a response, please send this through the contact officer of the report so an answer can be prepared to be shared verbally at the meeting, rather than in advance of the meeting via email**

AGENDA

1. Apologies for Absence

To consider apologies for absence.

2. Disclosure of Interests

To deal with any disclosure by Members of any disclosable pecuniary interests and interests other than pecuniary interests, as defined under the Seaford Town Council Code of Conduct and the Localism Act 2011, in relation to matters on the agenda.

3. Petitions

In accordance with the Town Council Petitions Policy, this is a standard agenda item to facilitate any public petitions being presented to, and noted by, Full Council. Please note, that this would not prompt a discussion on the petition at this meeting.

4. Public Participation

To deal with any questions, or brief representations, from members of the public physically in the meeting room, in accordance with relevant legislation and Seaford Town Council Policy.

5. Minutes

To note the following minutes in the table below.

Where there are recommendations to Full Council within the minutes, these are subject to a separate report elsewhere on the agenda, at which point the recommendation will be considered.

5.1	Assets & Facilities	16 July 2025	<u>16.07.25 Assets & Facilities Draft Minutes</u>
		<i>N.B. <u>Change to Draft Minutes</u> Minute ref AF16/07/25 - there has been a change to these minutes since the draft was issued, replacing the word 'by' with 'from' in the report description</i>	
5.2	Extraordinary Full Council	11 September 2025	<u>11.09.25 Extraordinary Full Council Draft Minutes</u>
5.3	Finance & General Purposes	19 March 2025	<u>19.03.25 Finance & General Purposes Draft Minutes</u>
		<i>N.B. <u>Noting Required</u> The minutes of the March 2025 F&GP Committee meeting have not yet been presented to Full Council due to an administrative oversight. Steps have been taken to reduce the risk of this recurring, as can be seen with 5.4 and 5.5 below, highlighting minutes that are due for review at the next Full Council meeting</i>	

		25 September 2025	<u>25.09.25 Finance & General Purposes Draft Minutes</u>
		<i>N.B: <u>Recommendation</u></i> <i>There is a recommendation from the F&GP Committee to adopt the revised Bad Debts Policy – this appears elsewhere on this agenda</i>	
5.4	Golf, Open Spaces & Climate Action	18 September 2025	<u>18.09.25 Golf, Open Spaces & Climate Action Draft Minutes</u>
5.5	Personnel	9 October 2025	The draft minutes have not yet been approved by the Chair, so will be presented at the next Full Council meeting
5.6	Planning & Highways	4 September 2025	<u>04.09.25 Planning & Highways Draft Minutes</u>
		2 October 2025	<u>02.10.25 Planning & Highways Draft Minutes</u>

6. [Mayor's Update Report](#)

To consider report 86/25 presenting the Mayor's update report and details of engagements (pages 8 to 12).

7. Town Council Working Group Reports

A standard agenda item to accommodate reports from active Town Council Working Groups.

N.B. There are written reports from three working groups that feature later in this agenda.

8. Outside Body Representative Reports

A standard agenda item to enable Town Councillors appointed as representatives of outside bodies of the Town Council to give brief verbal updates on relevant business / activities of the outside body, for noting only.

9. District & County Councillor Update

To give an opportunity for an update from councillors at a District or County level on business and activities that effect Seaford and the local area.

10. [Town Clerk's Update Report](#)

To consider report 97/25 updating on key Town Council work and work priorities for the Town Clerk (pages 13 to 25)

11. Complaints, Freedom of Information Requests and Appeals Update Report – September 2025

To consider report 79/25 updating on complaints, Freedom of Information requests and appeals (pages 26 to 28).

12. Options for Hope Gap Steps

To consider report 93/25 presenting the options for Hope Gap Steps and setting out the recommended option for consideration by Full Council (pages 29 to 41).

13. Strategic Plan Refresh – Draft STC Strategy Programme 2025 - 2027

To consider report 95/25 seeking approval from Full Council to replace the Strategic Plan 2023 - 2027 with a newly created draft STC Strategy Programme 2025 - 2027 (pages 42 to 51).

14. Seaford Town Football Club Working Group Recommendations – Gates, Floodlights & Adverts

To consider report 87/25 presenting the recommendations of the Seaford Town Football Club Working Group in relation to the use of the floodlights, closure of the gates and display of adverts by the Football Club within The Crouch (pages 52 to 74).

15. Seaford Health Stakeholder Group – Seaford Town Council Representation

To consider report 94/25 seeking to appoint Town Council representatives to the Seaford Health Stakeholders Working Group (pages 75 to 78).

16. Chyngton Brooks – New Path and Associated Bench and Planting

To consider report 89/25 seeking approval, in principle, from the Town Council for a new path and associated furniture and planting on Seaford Town Council land (pages 79 to 84).

17. Memorial Policy - Exception to Pause Request October 2025

To consider report 88/25 seeking approval from Full Council for an exception to be made to the hold on the Memorial Policy (pages 85 to 87).

18. Adoption of a Whistleblowing Policy

To consider report 98/25 presenting the recommendation from the Personnel Committee to adopt the Whistleblowing Policy (pages 88 to 100).

19. Review of the Bad Debt Policy

To consider report 90/25 presenting the recommendation from the Finance & General Purposes Committee to adopt the revised Bad Debt Policy (pages 101 to 109).

20. Exclusion of the Press & Public

The Chair will move that in accordance with the Public Bodies (Admission to Meetings) Act 1960, the press and public be excluded from the meeting during the discussion on the next item of business for the reasons as set out below.

The resolutions of the item will be recorded publicly in the minutes of this meeting.

The Proper Officer considers that discussion of the following items is likely to disclose exempt information as defined in the Local Government Act 1972 and Data Protection legislation and may therefore need to take place in private session. The exempt information reasons are shown alongside each item below.

Furthermore, in relation to paragraph 10 of Schedule 12A, it is considered that the public interest in maintaining exemption outweighs the public interest in disclosing the information.

21. Hurdis House Options Appraisal & Recommendation EXEMPT

To consider report 92/25 providing Full Council with the options appraisal and subsequent recommendations in relation to Hurdis House, 10 Broad Street (exempt pages).

Reason for exemption: to consider commercially sensitive arrangements relating to the financial and business affairs of the Town Council's assets.

Explanation of Reason: under the Freedom of Information Act 2000 s43(1), disclosure of this report would likely prejudice the commercial interests or activities of any party.

AGENDA NOTES

For further information about items on this Agenda please contact:

Steve Quayle, Town Clerk, 37 Church Street, Seaford, East Sussex, BN25 1HG

Email: meetings@seafordtowncouncil.gov.uk

Telephone: 01323 894 870

Circulation:

All Town Councillors and registered email recipients.

Public Access:

Members of the public looking to access this meeting will be able to do so by:

1. Attending the meeting in person.

Due to health and safety restrictions, the number of public in attendance will be limited. The Town Council therefore asks that you contact

meetings@seafordtowncouncil.gov.uk or 01323 894 870 to register your interest in attending at least 24 hours before the meeting.

Spaces will be assigned on a first come, first served basis.

Please note that if you don't register and just attempt to turn up at the meeting, this could result in you not being able to attend if there is no space.

OR

2. Watching the recording of the meeting on the [Town Council's YouTube channel](#) , which will be uploaded after the meeting has taken place.

Public Access to the Venue:

If you are attending the meeting in person, please arrive from 6.45pm where you will be shown into the meeting for a 7.00pm start.

Public Participation:

Members of the public looking to participate in the public participation section of the meeting must do so in person, by making a verbal statement during the public participation section of the meeting.

Below are some key points for public participation in the meeting:

1. Your statement should be relevant to the activities of the Town Council.
2. You will only be able to speak at a certain point of the meeting; the Chair of the meeting will indicate when this is.
3. You do not have to state your name if you don't want to.

4. If you are unsure of when best to speak, either query this with an officer/councillor ahead of the meeting or raise your hand during the public participation item of the meeting and ask the Chair – they will always be happy to advise.
5. When the Chair has indicated that it is the part of the meeting that allows public participation, raise your hand and the Chair will invite you to speak in order.
6. Statements by members of the public are limited to four minutes and you don't automatically have the right to reply. The Chair may have to cut you short if you overrun on time or try to speak out of turn – this is just to ensure the meeting stays on track.
7. Where required, the Town Council will try to provide a response to your statement but if it is unable to do so at the meeting, may respond in writing following the meeting.
8. Members of the public should not speak at other points of the meeting.
9. A summarised version of your statement, but no personal details, will be recorded in the minutes of the meeting.

Public Comments

Members of the public looking to submit comments on any item of business on the agenda can do so in writing ahead of the meeting and this will be circulated to all councillors.

Comments can be submitted by email to meetings@seafordtowncouncil.gov.uk or by post to the Town Council offices.



Seaford Town Council

Report No:	86/25
Agenda Item No:	6
Committee:	Full Council
Date:	23 October 2025
Title:	Mayor's Report October 2025
By:	Isabelle Mouland, Community Engagement & Democratic Services Manager
Purpose of Report:	To present the Mayor's update report and details of engagements

Actions
Full Council is advised:
1. To consider the update provided by the Mayor. 2. To move to a vote on the motions below.

Recommendations
Full Council is recommended:
1. To note the content of the report.

1. Information

- 1.1** The Mayor's update report can be found at Appendix A.
- 1.2** Details of mayoral engagements attended/hosted since 26 June 2025, at the time of writing, can be found below:

EVENT	DATE	ORGANISATION
Summer Gala Evening at Cuckmere Haven	26.06.25	Cuckmere Community
Armed Forces Day	28.06.25	Royal British Legion
Eastbourne Concert	01.07.25	Eastbourne Concert Orchestra
End of year Open Rehearsal	04.07.25	Seaford Musicians

EVENT	DATE	ORGANISATION
Mayor's Civic Reception	12.07.25	Seaford Town Council
Sea Sunday Service at St. Andrew's Church, Bishopstone	13.07.25	St Andrew's Bishopstone
Sports Day and Summer Extravaganza	17.07.25	Bowden House School
Shingle Vegetation – Botany Training	17.07.25	OVCA
Girl Guides Afternoon Tea	03.08.25	Seaford Girl Guides
Port Manor Care Home Official Opening	08.08.25	Barchester Healthcare
Weald on the Field	09.08.25	The Mayor of Uckfield
Teddy's Bear Picnic	12.08.25	Family Support Work
VJ Day anniversary	15.08.25	Royal British Legion
Private View of the Artwave event	05.09.25	Homelink
Seaford Health Walk	09.09.25	Seaford Health Walk Group
MacMillan Coffee Morning	12.09.25	Seaford Residents
NCI Newhaven KAVS official opening	18.09.25	NCI Newhaven KAVS
Welcome home the Coat of Hopes	21.09.25	Seaford Environmental Alliance
Mayor of Peacehaven Civic Service	21.09.25	Peacehaven Town Council
Chairman of East Sussex County Council Civic Reception	29.09.25	East Sussex County Council

1.3 Future engagements (up to 23 October) that the Mayor plans to attend can be found below:

EVENT	DATE	ORGANISATION
200 years of the Dieppe - Newhaven line	10.10.25	Newhaven Tourist Information Centre
Black History Month - Commonwealth War Graves	14.10.25	Commonwealth War Graves Commission
Lantern Making for Seaford	15.10.25	Sussex Contemporary Illustrators &

Christmas Magic – Chyngton Primary School		Printmakers (SCIP)
Lantern Making for Seaford Christmas Magic – Annecy Primary School	16.10.25	Sussex Contemporary Illustrators & Printmakers (SCIP)
Mayor of Newhaven's Charity Quiz	17.10.25	Newhaven Town Council
Seaford Bonfire Celebrations	18.10.25	Seaford Bonfire Society

2. Financial Appraisal

2.1 There are no direct financial implications as a result of this report.

3. Contact Officer

3.1 The Contact Officer for this report is Isabelle Mouland, Community Engagement & Democratic Services Manager.

Report 86/25 Appendix A

Mayor's Report to October 2025 Town Council

The four months since the last timetabled Full Council meeting have flown by. My insight into the varied and useful activities of Seaford residents has increased significantly.

I keep a detailed log of my civic engagements on the Mayor's Facebook page here:
<https://www.facebook.com/mayorofseaford>

Firstly, the formal engagements relating to our military history, including Armed Forces Day and the 80th VE and VJ days, noting also the addition of a plaque beside the Seaford Town Council (STC) owned War Memorial which celebrates the sacrifice made by Gareth Wheddon. He was a Seaford born Royal Marine who died in the Northern Ireland Troubles in 1979. Unfortunately, his mother was too frail to attend in person but was shown photographs of the private family service that later took place. This was a rewarding and gratifying experience.

I also attended the Sea Ceremony at St Andrews Church Bishopstone in the presence of the Lord Lieutenant, where we were told about the appalling working conditions and exploitation of many foreign seamen. It was a sobering sermon particularly when one considers how much of our daily life depends on imports shipped by sea from around the world.

By contrast, my Civic Reception was a memorable event, with perfect weather, great musicians and lovely guests. We were delighted to welcome and celebrate the achievements of Jazz Turner who is a local wheelchair user who sailed singlehanded and unsupported around the British Isles. She broke records and raised lots of money and awareness for the local Sailability (disabled sailing facility). She is now a national media star with "round the world" ambitions.

Thanks to the volunteers from Family Support Work
<https://www.familysupportwork.org/> who baked and served delicious cakes and to Holy Cow who supplied the ice cream.

Amongst other notable events I attended, the Uckfield "Weald on the Field" event brought me into contact with their fire breathing Town Crier, and the Family Support Work Teddy Bears Picnic introduced me to our very own Rev James Hollingworth of St Leonards Church who teaches archery in his spare time.

I have attended Botany tours of Tidemills, health walks in The Salts and numerous musical concerts involving musicians of all ages.

Sadly, the duties of Mayor also included an interview with local BBC reporters following the tragic death of a 16 year old Seaford boy in September. At the time of writing, details and identities remain unclear but I speak with absolute confidence that the community of Seaford unites in support of those grieving or traumatised by their experience.

As the heat waves fade, we look forward to Bonfire, Remembrance and Christmas ceremonies.

I thank my colleagues and council officers for their support and good humour that make this role so rewarding.

Councillor Maggie Wearmouth,

Mayor of Seaford 2025 to 2026



Seaford Town Council

Report No:	97/25
Agenda Item No:	10
Committee:	Full Council
Date:	23 October 2025
Title:	Town Clerk's Update Report – October 2025
By:	Steve Quayle, Town Clerk
Purpose of Report:	To update Full Council on key Town Council work and work priorities for the Town Council

Actions
Full Council is advised:
1. To consider and discuss the updates presented within the report.
2. To move to a vote on the motions below.

Recommendations
Full Council is recommended:
1. To note the contents of the report.

1. Introduction

- 1.1 The first half of the 2025 - 2026 municipal year has continued to be a busy time for the Town Council. We are now nearing the end of Quarter 2 (Q2) of the municipal year - Councillors will recall the new structure splits the year into four 'quarters' and within each 'quarter' there will be one sitting of each standing committee followed by a Full Council meeting.
- 1.2 Q2 (July to October) has seen the second sitting of each of the new standing committees, organised around a break over the summer holidays.
- 1.3 It gives me great pleasure to welcome onboard a number of new officers since we last met in June. We have welcomed on board:

- (a) Darryl Keech as Deputy Town Clerk & Responsible Financial Officer, who joined us in September. Darryl comes from a predominantly private sector background but has substantial experience working with elected councillors and with local government. Darryl has really hit the ground running and has already introduced a tranche of compulsory staff training alongside the development of a number of new policies. In addition, Darryl has been taking time to fully learn and understand the budget setting process which is coming up in Q3. Darryl is the lead officer for the Finance & General Purposes and Personnel Committees.
- (b) Peter Cousin as Head of Place, who joined us in August. After a number of unsuccessful attempts to appoint to this role previously, we have been very lucky to find and secure someone of Peter's calibre. He has a vast amount of experience in place-making and has already been instrumental in work with the National Nature Reserve, overseen the recent tender process for the Grounds Maintenance Contract, and is busy networking and making contacts with all manner of stakeholders across the town. Peter is the lead officer for the Assets & Facilities and Golf, Open Spaces and Climate Action Committees.
- (c) Peter, Darryl and myself now form the Strategic Management Team for the Town Council and together provide the main conduit for councillor-officer relations.

1.4 In addition to the above, we have successfully recruited to the positions of:

- (a) Policy & Risk Officer
- (b) Senior Committee Clerk
- (c) Human Resources & Organisational Development Manager
(temporary)

1.5 We now only have one remaining vacancy to fill from the staffing structure approved by Full Council in December 2024; that of Funding & Contracts Officer, the recruitment for which will begin in short order. In addition, the permanent recruitment for the Human Resources & Organisational Development Manager will also begin in due course.

1.6 Longer serving officers are reporting a noticeable and marked difference in their workloads and a welcome increase in their capacity to work on

planned and preventative issues, rather than solely being focusing on a reactive and 'firefighting' basis as has been the case for a long time.

- 1.7** A great deal of work has been undertaken over the summer to refresh the Strategic Plan. There is a separate report elsewhere on the agenda presenting the proposed new document, however I would like to take this opportunity to thank the councillors involved alongside the Head of Place and Operations & Facilities Manager, for their hard work at pace throughout the summer to be in a position already to bring forward the refreshed proposal in such a quick timeframe.
- 1.8** The Town Council has continued to monitor the fast-moving devolution agenda taking place across the county. Lewes District Council has recently altered their original request for the Town Council to submit its most desired assets and has instead requested a comprehensive list of all assets we may be interested in acquiring, subject to future due diligence. To that end, Councillors have been asked to respond to a survey to vote for up to 15 such assets they are in favour of exploring, and once this exercise is complete and votes compiled we will approach the District Council to advise them all the assets of interest, as per the delegated powers granted in June 2025.
- 1.9** The County Council's (ESCC) plans for Exceat Bridge have finally got off the ground. The Compulsory Purchase Orders have now been granted by the Secretary of State should they be needed and ESCC have been undertaking preparatory works for a number of weeks. ESCC have advised that construction works will begin in earnest from the spring of 2026. Road closures should only be needed for a total of 19 days.
- 1.10** Work has continued internally towards reviewing the Memorial Policy with a view to bringing a proposed new policy back to Full Council in due course so the policy can be un-paused by April 2026. In the meantime, there is a paper elsewhere on this agenda about a third request for an exception to be made to the pause.
- 1.11** We have now secured written solicitor undertakings of the Town Council's ownership of Cliff Gardens, which in turn enables us to enter into a Licence to Occupy with the South Downs National Park Authority (SDNPA). Once this paperwork process has been completed in coming days they hope to

‘break ground’ on the project within the coming week. It is noteworthy that SDNPA are delivering this project at their cost and risk, not STC, however STC officers will form part of the project management group providing oversight for the project. Through the winter STC will work up a Maintenance & Management Plan with SCP, for Full Council’s approval, to ready for when the asset is delivered and passed back to the Town Council.

- 1.12** The Christmas Magic event is now taking shape and will represent another great event for the town – this year being held on 29 November. Sharan Brydon and her team have been working with many other stakeholders to ensure this event is a success, predominantly the Chamber of Commerce, the Seaford Street Market and Seaford Traders who are committed to ensuring we deliver a successful event. Officers would like to also thank Councillor Markwell for her substantial input in helping to organise this, alongside Councillor Rutland for agreeing to star as Santa. This year the route has been revised to enable more of the lantern procession to see the light switch on in Broad Street where the stage will be located at the top this year and acts will be performing there all day long. The Town Council is very thankful for support it has had through sponsorship from a number of community organisations.
- 1.13** Following on from approval at September’s Extraordinary Full Council meeting, the Assets & Contracts Manager has commenced the large task of registering the Town Council’s land properly and correctly at HM Land Registry. There are lots of processes and paperwork completion involved in this task but it is being worked through carefully and methodically to ensure the Town Council’s assets are established on the right footing.
- 1.14** Following on from significant concerns expressed across the summer months, a number of areas of concern now feature prominently on the proposed STC Strategy Programme 2025-2027 (elsewhere on the agenda) for approval at this meeting. In brief, improvements to seafront toilet provision and cleaning, seafront bin provision and emptying, parking and the access road at South Hill Barn and campervans parking along the gravel strip are all areas that many residents and councillors have raised with officers during 2025. Each of these areas has proposed

resolutions/responses/trials proposed in the refreshed STC Strategy Programme 2025-2027.

- 1.15 The compostable toilets have been moved to South Hill Barn, however they have now been broken into and/or forced open before they were ready to be commissioned and opened, which has set the project back. They will be opened properly and in due course and this will be announced on the STC website and via social media.
- 1.16 This report is intended to provide a small flavour of the diverse projects and workstreams that are being worked on, as always there is myriad of other workstreams ongoing. Officers continue to work hard to attend to all matters in a professional and timely manner for the betterment of Seaford.

2. Meeting Updates

- 2.1 Turning now to the various meetings involving councillors that have taken place since the last Full Council on 26 June:
- 2.2 **Full Council** held two extraordinary meetings over the summer, to discuss the Cliff Gardens Project, an objection made to the External Auditor, and work required to correct and bring up to date the Town Council's Land Registry affairs, amongst other items of business.
- 2.3 **Assets & Facilities Committee** met on 16 July and considered papers regarding the project work to date, the financial position year to date, proposals relating to Seaford Street Markets and the Martello Changing Places facilities following recent periods of public consultation, and exempt items of business relating to requests received from two concessionaires.
- 2.4 **Personnel Committee** met on 9 October and considered a revised Whistleblowing Policy, this having been deferred to Committee earlier in the year from Full Council. The revised policy now appears elsewhere on this Full Council agenda for consideration. The Committee also considered an exempt report providing a General HR Update.
- 2.5 **Golf, Open Spaces & Climate Action (GOSCA) Committee** met on 18 September and considered reports presenting an update from the Golf Course, updates on project work to date, the financial position year to date, and a request from Seaford Rugby Football Club for permission to install a new floodlight structure in The Salts (subject to planning permission). It had been intended to present GOSCA with a revised Climate Emergency Policy

and Climate Action Plan, however this had to be deferred to its next meeting on 27 November.

2.6 Finance & General Purposes Committee met on 25 September and considered various reports on the financial position year to date, the Receipts, Payments and Bank Reconciliations position, a Finance & General Purposes update report, an update on the Town Council's policies, and the budget timetable and framework for setting the 2026 – 2027 budget. In addition, the Committee considered an exempt report regarding Receipts Due for Payment.

2.7 Planning & Highways Committee have met regularly throughout this period to consider a wide variety of planning and tree works applications, in addition to road closure applications to facilitate a number of community events, such as Seaford Bonfire Night, Remembrance activities, and Seaford Christmas Magic.

3. Key Performance Indicators (KPIs)

3.1 Please find below information on formal resolutions passed since the start of the municipal year 2025 - 2026. Please note the motions listed below are those where actions after the meeting were required by the Town Council:

DATE	MOTION	UPDATE
May 2025	Election of Mayor, Deputy Mayor, Committee Chairs and Vice Chairs, Appointments of memberships of Committees	Changes enacted
May 2025	Changes to Outside Body Arrangements and Appointment of Councillor Representatives	Changes enacted
June 2025	GOSCA recommended Full Council approve in principle the Chyngton Brooks scheme <i>Later amended by National Trust</i>	<i>Appears elsewhere on this agenda for consideration of the amended version by Full Council</i>
June 2025	Delegated power afforded to Golf Course Manager, Responsible	Ongoing

DATE	MOTION	UPDATE
	Financial Officer and Chair of GOSCA to make purchases of replacement machinery using capital income from machinery sales	
June 2025	GOSCA recommended Full Council approve the new lease for the Base	Approved by June Full Council, with the lease finalised in September
June 2025	Establish a working group of GOSCA members to draft the Climate Action Plan and review the Climate Emergency Policy	Working Group formed at GOSCA and its work is ongoing
June 2025	F&GP recommended that Full Council adopts the Standing Orders policy	Adopted by June Full Council
June 2025	RFO to move underspend from Grants Pool budget into an earmarked reserve	Actioned
June 2025	2024 – 2025 Annual Governance & Accountability Return (AGAR) approved by Full Council for submission to the External Auditor	AGAR submitted to the External Auditor and six-week period of public rights of inspection held. The External Auditor has advised that they were unable to complete their review work as result of 'correspondence received' in relation to prior years. Once they have finalised their review, a final report

DATE	MOTION	UPDATE
		will be provided
June 2025	Full Council agreed its response to an objection that had been submitted to the External Auditor in relation to the 2023 – 2024 AGAR	The Town Council's response was submitted to the External Auditor and objector
June 2025	Full Council appointed a new Internal Auditor for the 2025 – 2026 financial year, Parish and Town Audit Services (PATAS)	PATAS carried out their interim internal audit in late-September. Officers are awaiting their internal audit report, once received this will be presented to Full Council
June 2025	South Hill Farm Business Tenancy agreed	Approved by June Full Council, with the lease finalised in September. <i>The Farming Objective Plan is still being finalised and will be presented to GOSCA for noting and comment on</i>
June 2025	A working group was formed to review the Town Council's Strategic Plan	A report appears elsewhere on this agenda presenting the revised Strategy Programme 2025 - 2027
June 2025	An update on devolution was considered, with councillors to	Officers are liaising with councillors to

DATE	MOTION	UPDATE
	identify preferred District Council assets to be further investigated	identify a list of District Council assets to request further information on
June 2025	Discussions were held around the Town Council's Grounds Maintenance Contract ahead of this being tendered for on the open market	The tender opportunity was launched on 10 October, closing on 7 November. Due to the contract value, an extraordinary Full Council meeting will be arranged to award the contract
June 2025	Approval of the installation of a cycle rack in The Crouch	Not now proceeding as could not be delivered within the grant budget and no extra budget available to supplement
July 2025	To carry out a survey in 2026 on Seaford Street Market and use the results to inform a decision on the issuing of a street market licence for 2026	Work scheduled in
August 2025	Approval of a Town Council debit card for the Community Engagement & Democratic Services Manager	Actioned
August 2025	Approval of the Town Clerk as a signatory to the CCLA bank account	Actioned
August 2025	Approval of the South Downs National Park Authority taking over delivery of the Cliff Gardens Project	Ongoing

DATE	MOTION	UPDATE
	under a licence to occupy and with a Memorandum of Understanding in place, with a management and maintenance agreement to be entered into with Seaford Community Partnership	
September 2025	Approval of the costs to be incurred to correct and bring up to date the Town Council's Land Registry affairs	Ongoing
September 2025	Approval to enter into an agreement with BT Openreach for telecommunications equipment to be installed on land at South Street junction	Now approved and actioned following legal advice being obtained
September 2025	Full Council agreed its response to an objection that had been submitted to the External Auditor in relation to the 2023 – 2024 AGAR	The Town Council's response was submitted to the External Auditor and objector
September 2025	GOSCA approved a new floodlight structure for the Rugby Club, subject to planning permission and officers approving the final placement, installation, coordination, and site logistics at The Salts Recreation Ground	Ongoing
September 2025	F&GP recommended that Full Council adopts the revised Bad Debt Policy	A report appears elsewhere on this agenda presenting the revised Bad Debt Policy for consideration

DATE	MOTION	UPDATE
October 2025	Personnel recommended that Full Council adopts the Whistleblowing Policy	A report appears elsewhere on this agenda presenting the revised Whistleblowing Policy for consideration

- 3.2** Other actions discussed within Committee meetings are captured by officers, but do not appear above as they are not formal resolutions.

4. Strategic Plan

- 4.1** There is a separate item elsewhere on this agenda proposing a review and refresh of the Town Council's Strategic Plan. However, at this time, the existing Plan remains, and below is an update on Section 5: Projects List that forms part of the existing Strategic Plan 2023 - 2027:

No.	Project	Update
1	Move the 17 th green and the 18 th tees on Seaford Head Golf Course	The Golf Course Manager is fully engaged with partners and stakeholders to progress this complex project, and work is ongoing
2	Deliver the 80 th anniversary of D-Day and the refreshed Armed Forces Day celebrations	The D-Day 80 th anniversary and Armed Forces Day events have now been undertaken
3	Offer sponsorship opportunities to local businesses: maintain and renew current arrangements and develop further opportunities	Existing sponsorship arrangements exist with the decorative boat and water refill stations There is no progress on developing further opportunities for sponsorship to report
4	Carry out Bönningstedt Wall remedial works	The Bönningstedt Wall was rebuilt in May 2025

No.	Project	Update
5	Consider adopting Fields in Trust status for large green or recreation spaces owned by the Town Council	Since the appointment of the new Assets & Contracts Manager in April, background work on this workstream has progressed. Work continues via liaison with partners and stakeholders regarding the proposal and the implications of this to enable considered recommendations to be made to Full Council during this municipal year
6	Implement additional signage on seafront to help bring visitors to the town's shops and facilities	No progress on this project to report
7	Grounds Maintenance carry out formal review of arrangements for the town's open spaces and implement results	The tender process is currently live until 7 November
8	Carry out Martello Tower maintenance	This work is due to take place during this municipal year
9	Refurbishment of Martello Toilets and creation of new Changing Places facilities	These projects were completed in 2024 - 2025
10	Take appropriate action in relation to camper vans and motor homes	Officers continue to work hard to find ways to overcome the problems caused by campers parking along Seaford seafront. This work involves various external parties including the East Sussex County Council (ESCC) Parking Manager and ESCC Councillors
11	Consider renaming the Martello Fields	No progress on this project to report

No.	Project	Update
12	Identify and implement ways to minimise carbon usage and emissions by the Town Council	The GOSCA Committee WG is continuing to work on the development of a Climate Action Plan and draft Climate Emergency Policy
13	Look into the Town Council providing spaces for street art	No progress on this project to report
14	Update CCTV for the town	The Projects & Facilities Team continue to work on this project
15	Deliver the annual Christmas Magic Event	The Projects & Facilities Team continue to prepare to deliver the 2025 Christmas Magic Event

5. Conclusion

- 5.1 I am hopeful this report provides councillors and residents with an overview of key Town Council activities, demonstrating a snapshot of the varied mix of operational and strategic work that is currently being undertaken.

6. Financial Appraisal

- 6.1 There are no direct financial implications as a result of this report.

7. Contact Officer

- 7.1 The Contact Officer for this report is Steve Quayle, Town Clerk.



Seaford Town Council

Report No:	85/25
Agenda Item No:	11
Committee:	Full Council
Date:	23 October 2025
Title:	Complaints, Freedom of Information Requests and Appeals Update Report – June 2025
By:	Isabelle Mouland, Community Engagement & Democratic Services Manager
Purpose of Report:	To update Full Council on complaints, Freedom of Information requests and appeals

Actions

Full Council is advised:

1. To consider the updates presented within the report.
2. To move to a vote on the motions below.

Recommendations

Full Council is recommended:

1. To note the contents of the report.

1. Introduction

- 1.4** This report provides Full Council with updates on complaints, Freedom of Information (FOI) requests, and appeals.

2. Complaints

- 2.1** A formal complaint was received by the Mayor on 19 June 2025 regarding the Concession Tender Process undertaken in early 2025 at the Town Council's South Hill Barn site.

- 2.2** The complaint is currently under investigation, which is being carried out by a consultant from Local Council Consultancy (LCC).
- 2.3** The cost of this investigation will be in the region of £2,520, excluding VAT and expenses.
- 2.4** Once a final report has been produced, this will be discussed and reviewed by the Mayor in conjunction with the Deputy Town Clerk. At this point next steps will be established.
- 2.5** *Please note, any complaints relating directly to an employee are handled confidentially in accordance with the Town Council's Complaints Policy and are not included in this update.*

3. Freedom of Information Requests

- 3.1** The table below sets out updates regarding FOI requests since the last Full Council meeting in June 2025:

DATE	FOI REQUEST	UPDATE
April 2024	The View lease	In Progress
April 2025	STC job roles enquiry	In Progress
May 2025	Stopping up order	Response Sent
June 2025	Cliff Gardens	Response Sent
July 2025	The Salts Recreation Ground: Seaford Rugby Club, Seaford Cricket Club, Premier Football Club and others booking invoices 1/4/2024 to 31/3/2025	Response Sent
July 2025	Cafe facility at South Hill Barn	Response Sent
July 2025	Martello Café	Response Sent
July 2025	Martello Cafeteria - toilets refurbishment project	Response Sent
July 2025	The revised Terms of Reference (TOR) of the South Hill Barn Working Group (SHBWG) and the TOR of the Climate Action Plan Working Group	Response Sent
August 2025	2018 utility report related to Cliff Gardens	Response Sent
August 2025	Road naming enquiry	Response Sent
August 2025	Unregistered land enquiry	Response Sent

DATE	FOI REQUEST	UPDATE
August 2025	An investigator and a commercial sensitivity	Response Sent
September 2025	Crouch and The Salts pitch charges 1/4/25 to latest date	In Progress

3.2 Where FOI requests are received, officers review these for patterns and identify any steps to be taken as a result of this i.e. publishing information that has not previously been published, issuing communications to better explain the Town Council stance on a matter or actions being undertaken, or reviewing the ease of locating information on the Town Council's website, to provide examples.

4. Appeals

4.1 No new appeals have been received by the Town Council since the last Full Council meeting in June 2025.

5. Financial Appraisal

5.1 The cost of the LCC consultant undertaking the formal complaint investigation will be in the region of £2,520, excluding VAT and expenses.

5.2 This cost will come from the Professional Fees cost code (4155-201) which currently has £4,177 remaining.

6. Contact Officer

6.1 The Contact Officer for this report is Isabelle Mouland, Community Engagement & Democratic Services Manager.



Seaford Town Council

Report No:	93/25
Agenda Item No:	12
Committee:	Full Council
Date:	23 October 2025
Title:	Options for Hope Gap Steps
By:	Paul Quanstrom, Senior Projects Officer, and Peter Cousin, Head of Place
Purpose of Report:	To present the options for Hope Gap Steps and set out the recommended option for consideration by Full Council

Actions
Full Council is advised:
1. To consider the options proposed for Hope Gap Steps. 2. To move to a vote on the motions below.

Recommendations
Full Council is recommended:
1. To note the contents of the report. 2. To adopt option C; not to reinstate the Hope Gap Steps and continue to monitor and make safe as required.

1. Introduction

- 1.1 Hope Gap Steps (HGS) have been deteriorating over several years to the point where it has now become necessary to physically block access to prevent their use by the public. To fulfil the Town Council's (STC) occupier's liability duty, a fence enclosure, along with safety signage, has recently been installed and is monitored regularly.

- 1.2 Options to replace or rebuild the steps have been discussed extensively in recent years and earlier this year, STC engaged a structural consultant to assess the condition of the steps and suggest possible reconstruction options.
- 1.3 This report presents the details of the engineer's report, the available options and the recommendation of officers for consideration by Full Council.

2. Information

- 2.1 HOP Civil and Structural Engineers were engaged and submitted their report on the condition of, and options for, the steps in July; see **Appendix A1**. HOP Consulting Civil and Structural Engineers have produced a Coastal Civil Engineering Inspection Report dated 31 July 2025. In response to queries raised by officers they have also produced an Addendum Report, see **Appendix A2** which is erroneously dated 31 July 2025, but was actually received by the Town Council in recent weeks.. The reports taken together provide explanations regarding shoreline management and consider a potential hard-engineered option to protect the cliff face and a soft engineered steel structure if required for coastguard requirements.
- 2.2 The management strategy for the UK coastline is presented in a 'Shoreline Management Plan' (SMP). Briefly, the SMP is a non-statutory policy document for coastal defense management and planning. It takes account of existing planning initiatives and legislative requirements. It also provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks.
- 2.3 The Coast Protection Authority for the relevant area normally leads and adopts the policy which is normally informed by extensive stakeholder consultation with interested parties such as Local Authorities, Port Authorities, Coastguard, neighboring Coast Protection Authorities etc. The Coast Protection Authority for this area is the Environment Agency.
- 2.4 The Coastguard has been consulted and has indicated that there is no requirement to maintain access for public safety.

3. Options

- 3.1 Option A – reinstatement of the steps and a hard engineered solution:
- 3.2 In light of the above, if any step replacement were to be adopted in order to protect this stretch of coastline, an additional hard engineered solution would also be required, comprising protecting / armouring the cliff face with rock or by

the construction of a wave return wall amongst other large robust civil engineering structures. If this was considered, it would likely be required along the full stretch of the cliff to avoid any further undermining elsewhere. This would also require a change of Shoreline Management Policy for the area and attract consultation with interested parties. These works would be significant and may not be the preferred option given the current Shoreline Management Policy. Such a structure is difficult to precisely delineate however, it would probably require at least 200 and possibly up to 600 metres of protection at an estimated cost of approximately £15,000 per metre, therefore a cost in the order of £3-9 million.

3.3 Option B – reinstate the steps without a hard engineered solution:

- 3.4** It has previously been suggested that a Birling Gap-type approach could be adopted. However, installing such a structure would be a relatively short-term solution, as on its own it would have no protection, as described above.
- 3.5** The estimated cost for creation of the steps themselves is a minimum of approximately £1 million. To expand, the Birling Gap steps were replaced in 2017 - 2018 and are understood to have cost approximately £300,000. Construction inflation over that period has been substantial and therefore in today's terms this would equate to approximately £600,000.
- 3.6** The work would also involve the demolition of the existing steps (approx.. £200,000), groundwork on the beach (approx.. £100,000) and redesign (approx.. £50,000). The site compound and access would also be much trickier and would require further funds to accommodate this (estimated in the region of £50,000).
- 3.7** The process to get planning permission would be complex and costly, (projects within the National Park as a good rule should allow 20% of project costs for the planning process) as would obtaining Natural England's consent. Following conversations with Natural England It is likely that the special ecological nature of the site (potter bees, moon carrot etc.) would severely limit what could be done, and therefore acquiring approval to build the steps may not be forthcoming.
- 3.8** Due to the exposed location, it is estimated that the sea would demolish the steps structure within 5-10 years without a hard engineered sea defense. It is also worth noting that, unlike at Birling Gap, high tides at Hope Gap regularly

inundate the lower section of the steps, being slightly below the high-water mark. There would be very little shingle to protect whereas, at Birling Gap, there is significant shingle present and the steps are rarely affected by high tides as they sit slightly above high-water mark.

3.9 Option C – do not reinstate the steps:

3.10 This option would see the status quo maintained and allow nature to take its course so the steps gradually become demolished by the sea. The steps have been fenced off and these will be monitored weekly. In the event of the inevitable breaches in the safety fencing etc., arrangements will be made to reinstate as required. How often this would be required is difficult to predict, however costs associated are relatively minimal (estimated £2-3,000 per annum). Notwithstanding, in the short term, removal of the partially unsupported upper slab, as recommended by HOP, will be investigated.

4. Summary of Options

4.1 The options have been identified as:

- (a) Option A - Reinstatement along the lines of Birling Gap or similar including hard engineered protection to ensure some longevity; estimated cost approximately £4-10 million (£3-9 million for defenses and £1million for steps).
- (b) Option B - Reinstatement along the lines of Birling Gap without hard engineered protection, which would have a much shorter life span of approximately 5 -10 years; estimated cost in excess of £1 million minimum.
- (c) Option C - Do not reinstate; continue to monitor and make safe as required and investigate removal of upper slab; estimated cost around £2-3,000 per annum to maintain the safety of the area, plus costs for the removal of the unsupported upper slab, which are yet to be investigated.

4.2 The conclusion is that unless significant funds are spent there are no other options to pursue other than allowing the steps to gradually be demolished by the sea.

4.3 Due to the exceedingly high cost of option A and the high cost and short term nature of option B, it is regrettably recommended that Option C is adopted.

5. Implementation of the Preferred Option

5.1 Subject to Full Council approving the option of not reinstating the steps, the implementation would be as follows:

- (a)** Issue public communications confirming the Town Council's decision and the reasons for this, whilst acknowledging the sentimentality of the site locally,
- (b)** Review and update the signage onsite,
- (c)** Confirm the Town Council's decision with the key stakeholders onsite; the Coastguard, Environment Agency, Natural England, Sussex Wildlife Trust, South Downs National Park Authority and Coastguard Cottage owners,
- (d)** Further investigate the unsupported upper slab at the top of the steps and arrange for the necessary works to take place,
- (e)** Carry out weekly inspections and undertake any necessary works to ensure the safety of the site.

6. Confirmation of Emergency Spending

6.1 Following advice that the condition of the steps had become a danger to the public, the Town Council was required to fulfil its duty of care and ensure the area was made safe, despite no budget provision being available.

6.2 The Town Clerk, acting under the Financial Regulation 5.15 (see below), therefore approved the following expenditure:

- (a)** HOP Civil and Structural Engineers – site attendance, advice and report: £1,550
- (b)** Harrity Building Construction – encasement of the steps to prevent further use: £2,827

6.3 This brings the total expenditure to £4,377, which will be met from General Reserves.

6.4 Financial Regulation 5.15 states:

6.5 *“In cases of serious risk to the delivery of Town Council services or to public safety on Town Council premises, the Town Clerk may authorise expenditure of up to £10,000 (excluding VAT) on repair, replacement or other work that, in their judgement, is necessary, whether or not there is any budget for such expenditure. The Town Clerk shall report such action to the Mayor of the Town Council as soon as practicable thereafter.”*

7. Financial Appraisal

- 7.1** By adopting Option C to “not reinstate”, STC will need to undertake regular inspections by officers, as well as undertake safety work as and when required. The exact regularity and quantity of these works is hard to predict but is estimated to be £2,000-£3,000 per annum and would be budgeted for accordingly each year.
- 7.2** The cost of the works on the unsupported upper slab at the top of the steps are not yet known. Depending on the urgency of the works, this cost may have to be approved by the Town Clerk under Financial Regulation 5.15 (as per section 6 above) or, where possible, will be reported to the Golf, Open Spaces & Climate Action Committee. In the event of no available budget, these costs would be met from General Reserves.
- 7.3** The Town Council cannot afford to fund Option A, and Option B would deplete much of the Town Council’s General Reserves, which may be needed in the future to maintain its many statutory and discretionary obligations. Due to not recommending options A or B and the very high estimated costs these would incur, officers have not explored the potential external funding routes for these works. If the Town Council were minded to pursue or further investigate either of these options, significant work would be required by officers to identify how and whether these works could be funded externally. It is estimated that to create a fully costed project would itself cost a minimum of £20,000 - £30,000.

8. Contact Officer

- 8.1** The Contact Officer for this report is Peter Cousin, Head of Place.

Mr Paul Quanstrom
Seaford Town Council
37 Church Street
Seaford
BN25 1HG

By email: paul.quanstrom@seafordtowncouncil.gov.uk

Dear Paul

HOPE GAP BEACH STEPS, CUCKMERE HAVEN, SEAFORD

Coastal Civil Engineering Inspection

You requested HOP attend site to inspect and report on the above steps which we understand had been closed due to safety concerns. HOP Engineer James Taylor attended site on 9th May 2025. We were accompanied by Paul Quanstrom of Seaford Town Council and Shannon Darke of TMS.

1.0 BACKGROUND

The steps are located at Hope Gap, close to Cuckmere Haven cottages, east of Seaford town within the South Downs National Park. They convey pedestrian access between the beach foreshore and cliff top which is located within the South Downs National Park. The public are free to access both the National Park and foreshore in the area. The steps were closed from public access and secured at the time of the visit.

2.0 OBSERVATIONS

The chalk cliff in the area varies in height up to around 10m or so. Access to the beach is available at Cuckmere Haven estuary approximately 750m to the east. The beach in the area is tidal and floods right up to the foot of the chalk cliff. It is not uncommon for members of the public to misjudge the tides in the area and become stranded or cut off by the tide. Sometimes such incidents require rescue by coastguard or RNLI. Access / egress is therefore an important consideration in decision making.

Construction is formed of 3 flights with a short landing between each flight. The works are ground bearing in nature with a flint faced weathering wall or skin affording some protection to the chalk cliff beyond from wave action.

Significant active erosion or cliff regression was evident which has led to undermining of the top third of or so, see Photograph 3. This section can be seen in cross section where the weathering wall has been lost. Parts are rather precariously receiving partial bearing from topsoil underlain by weathered chalk cliff face for considerable height.

From foreshore level undermining is evident continuing up to the second landing with hydraulic erosion activity occurring. Cliff chalk erosion and weathering is ongoing with the loss of the flint faced weathering wall and with parts now being washed out from the rear.

The bottom two thirds or so were in a better condition though overall integrity is compromised by loss of the remaining top third.



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On the eastern side of the steps, the regression process appears to be forming a chalk promontory with erosion occurring to the west, Photograph 4.

A previous structure appears to have historically abutted the original steps with old foundations evident arcing to the east in front of the cliff. This appears to be some form of abandoned cost protection wall.

It appeared that there was a bee's nest in the area this should be considered if any works are required as it's understood they may be a protected species.

3.0 DISCUSSION

The steps are currently undermined and unstable and in an active erosion environment. They should remain closed. It should be expected a progressive collapse scenario will develop soon. The situation is unpredictable and is likely to change in storm when sea state is high. There is an overhead risk to the public at beach level also from overhead debris. The situation should be monitored and managed.

A quick review back in the office of satellite images dating back to 2004 suggests a general trend of cliff regression in the area along with lowering of the shingle beach. Shingle beaches 'spend' or absorb wave energy and offer some coast protection function.

It is understood that the Shoreline Management policy for the area is one of 'No Active Intervention' (NAI). This means a policy decision has been made in the area to allow natural coastal processes to proceed as and when coastal defences become uneconomic to maintain. Coastal defences include shingle beached and management of the shingle beach by use of retention structures such as groynes or shingle recharge amongst other things.

An alternative shoreline management policy is to 'Hold the Line' (HTL). HTL means maintain or upgrade protection from erosion by holding the shoreline in broadly the same position. This requires a policy decision to invest and improve coast protection e.g. recharge the beach or install / maintain groynes or cost protection walls etc.

The Beachy Head to Selsey Bill Shoreline Management Plan Section C.4.2.2 describes what is to be expected of the NAI policy. For epoch (period) 0 to 25 years (2025) erosion, lowering of the beach and undermining processes were predicted to occur. Unless there is a change in policy from NAI to HTL then cliff regression can be expected to continue. Between 2025 and 2055 the Shoreline management plan predicts the following evolution:

'Along previously defended cliff lines, the cliffs will become reactivated and initially erode at a much faster rate than the adjacent cliffs because they have historically artificially been held seaward. Even where unprotected, cliffs will erode at their base (due to marine erosion), and along the cliff top, (due to sub-aerial weathering processes), at a greater rate than present due to accelerated sea level rise and increased rainfall. Along most of the frontage, cliff erosion will not provide sufficient sediment to build beaches at the toe of the cliffs. Areas that accreted during the previous epoch would generally be expected to stabilise or even exhibit erosion, due to diminishing sediment supply and sea level rise.'

Ultimately a long-term policy decision has been made to abandon these steps and accept they will eventually become lost. That is what is actively happening.

Given the NAI policy adopted for the area a hard engineered or defended option such as armouring or sea wall is not considered appropriate as adjacent undefended areas would simply retreat and coastal processes would likely continue to attack the area from its sides and rear.

Date: 31 July 2025 Rev 1

Your Ref:

Our Ref: JT/SMW/16363-4

Page: 3 of 5



It is recommended that the coastguard is consulted to establish if there is a need to maintain access at this point in the interest of public safety and recovery of persons from the beach trapped by the tide. Should it be concluded there remains a need for access to be maintained a piled structure might be considered with a bank seat or bridging unit set back from the current cliff edge to allow for the expected ongoing regression. This might be future proofed to allow for relocation as and when regression continues. In the meantime the structure should be monitored / inspected regularly to keep track of the rate of deterioration and need for making safe works may. It is recommended that the precarious slabs are carefully removed to eliminate / reduce the overhead risk and public kept away from the steps and area below.

Any works below Mean High Water Springs (MHWS) would attract a Marine Licence along with other statutory consents in the usual way.

I hope this brief report is informative should you require options to be developed design or further advice please do not hesitate to contact me.

Yours sincerely

J Taylor

James Taylor & Nigel Hosker Beng CEng FICE

For HOP Consulting Limited

jamest@hop.uk.com



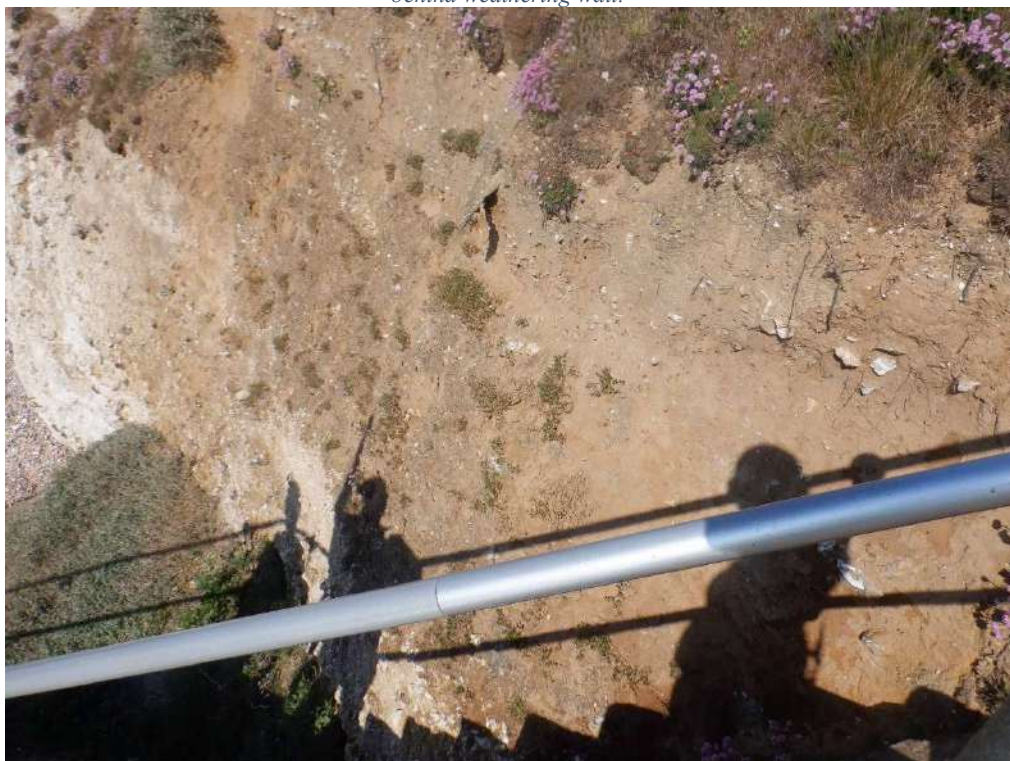
Photograph 1 – Indicating general overview of steps from cliff level, looking southwest. Note undermining, support from near vertical topsoil underlain by weathered chalk, loss of weathering wall and suspected arching foundations to historical coastal defences.



Photograph 2 - Showing eroded section of cliff below steps, looking north and undercutting



Photograph 3 – Indicating east elevation of cliff steps, note junction to suspected historical coastal defence now lost and erosion behind weathering wall.



Photograph 4 - Cliff on the Western Side

Date: 31 July 2025 Rev 1

Your Ref:

Our Ref: JT/SMW/16363-4

Page: 1 of 2

Mr Paul Quanstrom
Seaford Town Council
37 Church Street
Seaford
BN25 1HG

By email: paul.quanstrom@seafordtowncouncil.gov.uk

Dear Paul,

HOPE GAP BEACH STEPS, CUCKMERE HAVEN, SEAFORD
Coastal Civil Engineering Inspection, Addendum Report

I hope you are well. Please see below responses to your queries.

1.0 CLIENT QUERIES

- Who Outlines the Shoreline Management Policy of No Active Intervention.**

The overall management strategy for the UK coastline is presented in a 'Shoreline Management Plan' (SMP). Briefly the SMP is a non-statutory policy document for coastal defence management and planning. It takes account of existing planning initiatives and legislative requirements. It also provides a large scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks.

The Coast Protection Authority for the relevant area normally leads and adopts the policy which is normally informed by extensive stakeholder consultation with interested parties such as Local Authorities, Port Authorities, Coastguard, neighbouring Coast Protection Authorities etc. The Coast Protection Authority for the area is recorded as being the Environment Agency.

- Could you expand further on the hard engineered or defended option, in terms of design and construction process**

A hard Engineered solution might be armouring with rock or construction of a wave return wall amongst other large robust Civil Engineering structures. If a hard engineered or defended option was considered, this would likely be required along the full stretch of the cliff to avoid any further undermining elsewhere. This would also require a change of Shoreline Management Policy for the area and likely attract consultation with interested parties. As mentioned these works would likely be significant and may not be the preferred option given the current Shoreline Management Policy.

- **STC have consulted the coastguard for imminent installation of safety fencing to surround the steps with the aim to cut off access. Could you explain a steel piled structure further.**

It is understood that the coastguard have been consulted by STC to establish if there is a need to maintain access at this point in the interest of public safety. Safety fencing installation has been planned by STC, and it has been established that access is unlikely to be required presently. Should STC conclude that there remains a need for access to be maintained in the future a piled structure might be considered with a bank seat (abutment) built into the cliff with a bridging unit set back from the current cliff edge to allow for the expected ongoing regression. A piled structure such as this might consist of tubular piles driven into the foreshore supporting a hot rolled steel stair and bridging unit between top of cliff and to of stair. Please see sketch attached for an outline scheme This might be future proofed to allow for relocation as and when regression continues.

I hope this addendum report answers your queries should you have further questions or require options to be developed design or further advice please do not hesitate to contact me.

Yours sincerely

James Taylor

James Taylor MEng GMICE & Nigel Hosker BEng CEng FICE

For HOP Consulting Limited

jamest@hop.uk.com



Seaford Town Council

Report No:	95/25
Agenda Item No:	13
Committee:	Full Council
Date:	23 October 2025
Title:	Strategic Plan Refresh – Draft STC Strategy Programme 2025 - 2027
By:	Steve Quayle, Town Clerk
Purpose of Report:	To seek approval from Full Council to replace the Strategic Plan 2023 - 2027 with a newly created draft STC Strategy Programme 2025 - 2027

Actions
Full Council is advised:
1. To consider the draft STC Strategy Programme 2025 - 2027 and ask questions. 2. To move to a vote on the recommendations below.

Recommendations
Full Council is recommended:
1. To relinquish the existing Strategic Plan 2023 - 2027. 2. To adopt the draft STC Strategy Programme 2025 – 2027.

1. Information

- 1.1 On 26 June 2025 the Town Clerk brought a paper (89/25) to Full Council proposing the creation of a Working Group (WG) to devise and draft a new strategy document in place of the existing Strategic Plan 2023 - 2027.
- 1.2 It was posited that the existing Strategic Plan has become largely irrelevant in the intervening time since it was created, and a refreshed, simpler, 'SMART' version was now needed.
- 1.3 Since that time, a WG of five councillors has worked at pace with the Town Clerk, the Head of Place and other officers to devise a new draft document.

2. Introducing the Draft STC Strategy Programme

- 2.1 The proposed STC Strategy Programme 2025 - 2027 is attached at **Appendix A**. The existing Strategic Plan 2023 - 2027 is [available on the Town Council's website here](#).
- 2.2 The WG agreed early on during their work that the length (at 55 pages) and complexities of the existing Strategic Plan made the document inaccessible and this has contributed to its increasing irrelevance to the operation of the Town Council.
- 2.3 A strategy document should ideally be the 'engine' of a Town Council and should help direct all its priority work undertaken. This is sadly not the case with the existing Strategic Plan.
- 2.4 To that end, the WG agreed that a much shorter and clearer document should be drafted to replace it. Following on from a review of previous documents and those used by other organisations, the WG settled on the proposal for a plan encapsulated within a table spread over just a handful of pages.
- 2.5 Following discussions, it was agreed the table should still focus on the six key 'Aims' from Section 3 of the existing Strategic Plan; these broad headings consisting of:
- (a) Economic
 - (b) Wellbeing
 - (c) Facilities & Assets
 - (d) Engagement
 - (e) Governance
 - (f) Climate
- 2.6 However, the similarities largely end here, as many of the 'Proposed Final Aims' from Section 3 and 'Delivery of the Aims' from Section 4 of the existing document were felt to be unspecific, vague, unachievable, and/or out of scope of a Town Council's abilities or competencies.
- 2.7 Instead, using these six key aims, councillors and officers have devised 25 new 'Strategies', encompassing 79 specific 'Goals' that are designed to be **Specific, Measurable and Achievable**. For each of these goals, they have been given a **Realistic Timeframe** by which they should be achieved

and/or concluded. As a result, the WG consider these new goals to represent '**SMART**' objectives.

3. Objectives Removed

- 3.1** A wide tranche of the stated aims and outcomes in the existing Strategic Plan have disappeared because there is no realistic way to measure delivery or success, and some because the Town Council has no ability nor competence to make these changes. A snapshot of some of these unattainable or unmeasurable aims/outcomes are:
- (a)** Promote and develop a thriving town
 - (b)** Safeguard the character of the town
 - (c)** Enable more opportunities for young people
 - (d)** Work with partners to maximise visitor accommodation
 - (e)** Make Seaford the best place it can be
- 3.2** Instead, the WG has reset the framing of the STC Strategy Programme 2025 - 2027 to ensure it captures similar strategies, but with attainable and specific goals.

4. Timescale of the STC Strategy Programme

- 4.1** It is recognised that the current administration only has 19 months remaining before the next election is held in May 2027.
- 4.2** However, the WG agreed to propose the duration of the STC Strategy Programme 2025 - 2027 should run for 24 months until October 2027 to provide the next administration of councillors a few months leeway after their election to work up a suitable new Strategic Plan for the duration of their four-year term.

5. RAG Rating & Latest Updates

- 5.1** If approved, the proposal is for officers to reproduce the STC Strategic Programme 2025 - 2027 at each 'quarterly' Full Council over the next 24 months.
- 5.2** At each update, each goal will be RAG rated (R=red, A=amber, G=green) on its progress against the realistic timeframe. This will help to provide a visual stimulus on the progress of each strategy and goal.
- 5.3** In addition to the RAG rating section, a 'Latest Update' box appears relating to each strategy/goal, thus enabling officers to provide the latest narrative update on each.

6. Lead Officers

- 6.1** Each strategy has been marked with the main officers who will be overseeing delivery of the strategy. In cases where several officers will be involved, the lead officer has been underlined for clarity. In most cases the lead officer for each strategy will be one of the newly comprised Strategic Management Team for the Town Council.

7. 2026 Refresh

- 7.1** The proposal is for the WG to be reconvened in around a year's time to revisit and light-touch review the STC Strategic Programme 2025 - 2027. This will help to ensure the document is kept up to date and remains relevant across the 24 months of its intended duration. It will also enable any areas that have changed between now and then to be addressed and for strategies and goals to be re-focused if necessary.
- 7.2** Following on from this review, any changes proposed will be brought back to Full Council in October 2026 for re-approval.

8. Financial Appraisal

- 8.1** There are no direct financial implications as a result of this report. Future year's budgets will however need to be amended to fund some of the projects included in revised strategy programme.

9. Contact Officer

- 9.1** The Contact Officer for this report is Steve Quayle, Town Clerk.

STC Strategy Programme 2025-2027														
October 2025 - October 2027 (To be reviewed and updated October 2026)														
Strategy	Ref	Goal (Specific, Measurable, Achievable)	Realistic Timeframe	Committee Oversight	Lead Officers (<u>main</u> <u>contact</u> <u>underlined</u>)	Progress RAG Rating								Latest Update
						25/26 Q4	26/27 Q1	26/27 Q2	26/27 Q3	26/27 Q4	27/28 Q1	27/28 Q2	27/28 Q3	

1	ECONOMIC: Promote and develop a thriving Town, enabling future opportunities for economic wellbeing and an active community															
1.1	Concession, Licence, Lease Management	A	Establish A&F 'Concessions Working Group' to review the current concession, lease and licence process/arrangements	Nov-25	A&F	Operations Manager, HOP & Town Clerk	example									
		B	A&F Concessions Working Group to devise recommendations and obtain Full Council approval	Oct-26												
		C	Implement new processes and arrangements	Apr-27												
1.2	Improve Accessibility of STC website & Golf Course website	A	Identify areas of improvement required for 'WCAG 2.2' protocols compliance across both websites	Dec-25	F&GP	Comm.Eng Manager & DTC										
		B	Make necessary changes required to ensure 95% score rating is achieved	Apr-26												
		C	Monitor continued compliance and address failings, as necessary	Mar-27												
1.3	Improve & Refresh Signage	A	Refresh Heritage Board Signage, in conjunction with Museum & Heritage Society & Chamber of Commerce	May-26	A&F	Operations Manager & HOP										
		B	Undertake signage audit across STC sites, identifying improvements available, and where amalgamation can occur	May-26												
		C	Commence incremental programme of signage changes, following on from signage audit	Jul-26												
1.4	Golf Course Improvements (* Dependent on Higher Tier Funding from RPA)	A	* Prepare necessary works for the redevelopment of the 17th green and 18th tees	Sep-26	GOSCA	Golf Course Manager, HOP & Town Clerk										
		B	* Achieve required approvals to commence works on 17th green and 18th tees	Sep-27												
		C	* Create new rides through scrub areas	Apr-27												
		D	Install new washdown facilities to recycle water and clippings	Apr-27												
		E	Commence a programme of extending wildflower areas	Apr-27												

Strategy	Ref	Goal (Specific, Measurable, Achievable)	Realistic Timeframe	Committee Oversight	Lead Officers (<u>main</u> <u>contact</u> <u>underlined</u>)	Progress RAG Rating								Latest Update
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2	WELLBEING: Develop & deliver projects to support the wellbeing of the Town's residents													
2.1	Evidence Base for New Community Centre	A	Map the community group provision already existing in the town	Feb-26	A&F	Operations Manager & <u>HOP</u>								
		B	Engage with residents and stakeholders to map the need for further provision	Jul-26										
		C	Finalise and, if approved, work up project including next steps, as appropriate (Oct-26 refresh to dictate next steps)	Oct-26										
2.2	The Salts Improvement Plan	A	Undertake consultations with key stakeholders	Mar-26	GOSCA	Operations Manager & <u>HOP</u>								
		B	Develop a selection of plans in partnership with planning authority	Oct-26										
		C	Undertake public consultation on proposed plans, to find a preferred solution	Mar-27										
		D	Finalise and achieve Full Council resolution for preferred solution (Oct-26 refresh to dictate next steps)	Oct-27										
2.3	Acquisition / Disposal of Assets	A	Work to acquire appropriate LDC assets, ensuring they deliver positive impact for Seaford and are sustainable for STC	May-27	A&F	Operations Manager, <u>HOP</u> & <u>Town Clerk</u>								
		B	Reach a final decision on future of Hurdis House - then action decision	Feb-26										
		C	Devise plan for future office location of STC (including the option to remain at Church Street, if appropriate)	May-26										
		D	Review management / potential sale of STC-owned Martello Beach Huts and obtain approval for recommendation	May-26										
2.4	Parking Solutions	A	Undertake a comprehensive review all STC car parking management	Mar-27	GOSCA	Operations Manager & <u>HOP</u>								
		B	If approved, undertake trial of pay and display (consider BN25 resident discount) at South Hill Barn car park	Jun-26										
		C	Plans for gravel strip options west of Martello Tower, and obtain approval for recommendation	Oct-26										
2.5	Emergency Plan	A	Establish links with Sussex partners and understand overarching SRF's plans and how to complement them	Jan-26	Full Council	Operations Manager, <u>HOP</u> & <u>Town Clerk</u>								
		B	Develop a Seaford Community Emergency Plan involving councillors, community groups and local emergency services	Jun-26										
		C	Seek Full Council adoption of the Seaford Community EP, and then monitor and adapt plan as circumstances dictate	Oct-26										

Strategy	Ref	Goal (Specific, Measurable, Achievable)	Realistic Timeframe	Committee Oversight	Lead Officers (<u>main</u> <u>contact</u> <u>underlined</u>)	Progress RAG Rating								Latest Update
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3	FACILITIES / ASSETS: Develop and maintain assets, settings and recreational facilities													
3.1	South Hill Barn Project	A	Compile reports and studies needed to bring Stage 1 of the project to a conclusion	Dec-25	SHB WG & Full Council	Senior Projects Officer & <u>HOP</u>								
		B	Present Stage 1 of project to Full Council. Seek to obtain approval to move to Stage 2 including necessary budget	Jan-26										
		C	Commence Stage 2 of project in line with project plan (Oct-26 refresh to dictate next steps)	Apr-26										
3.2	Toilet Provision	A	Review and run tender for toilet cleaning and maintenance	Feb-26	A&F	Operations Manager & <u>HOP</u>								
		B	Review toilet provision - town centre, seafront and open spaces, considering options for internal/external provision	Oct-26										
		C	Develop plan for toilets provision and obtain approval for recommendation (Oct-26 refresh to dictate next steps)	Jan-27										
		D	Establish viability of the reinstatement of public toilet at The Crouch (Oct-26 refresh to dictate next steps)	Jul-26										
3.3	Seafront Bin Provision	A	Undertake review to ensure best possible management of seafront bins, including options to help prevent overspill	Mar-26	A&F	Operations Manager & <u>HOP</u>								
		B	Trial various options through summer 2026 to see what has an impact	Jun-26										
		C	Review success of 2026 trials and work up future plans, informed by review (Oct-26 refresh to dictate next steps)	Nov-26										
3.4	Grounds Maintenance Contract	A	Undertake tendering process to appoint Ground Maintenance Contractors	Nov-25	GOSCA	Operations Manager, HOP & <u>Town Clerk</u>								
		B	Award and onboard new Grounds Maintenance Contract appointed contractor	Apr-26										
		C	One year comprehensive review of Grounds Maintenance Contract	Apr-27										
3.5	Hope Gap Steps	A	Make an informed, final Full Council decision on the future of Hope Gap Steps	Oct-25	Full Council	Senior Projects Officer & HOP								
		B	Commence process of implementing decision (Oct-26 refresh to dictate next steps)	Apr-26										

Strategy	Ref	Goal (Specific, Measurable, Achievable)	Realistic Timeframe	Committee Oversight	Lead Officers (<u>main</u> <u>contact</u> <u>underlined</u>)	Progress RAG Rating								Latest Update
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4	ENGAGEMENT: Give voice to residents actively directing our priorities to reflect their needs													
4.1	Communications Strategy & Working Digitally	A	Review STC's website and establish need for revised website, or completely new website	Dec-25	F&GP	Comm.Eng Manager & <u>DTC</u>								
		B	Make improvements to website resulting from review, or commence tender for new website if replacement necessary	Mar-26										
		C	Review STC's communication methods. Map audiences, preferred communication methods and branding of STC	Dec-26										
4.2	Youth Ambassador Board	A	Establish Youth Ambassador Board in conjunction with Seaford Head School and other educational settings	Oct-25	F&GP	<u>Comm.Eng Manager</u>								
		B	Facilitate rolling schedule of meetings with Youth Ambassador Board	Nov-25										
		C	Obtain feedback from participants on effectiveness and potential improvements going forwards	Jun-26										
4.3	Weekend Cover/Seafront Management Plan	A	Review need for an on-call weekend officer or a Seafront Officer to patrol weekends in peak season	Jan-26	Personnel	HR Manager, <u>DTC</u> & HOP								
		B	Obtain approval for preferred solution. Recruit appropriate officer, if necessary. Personnel policies to be updated	Mar-26										
		C	If approved, implement either on-call officer or Seafront management officer in line with new staffing budgets	May-26										

Strategy	Ref	Goal (Specific, Measurable, Achievable)	Realistic Timeframe	Committee Oversight	Lead Officers (<u>main</u> <u>contact</u> <u>underlined</u>)	Progress RAG Rating								Latest Update
						25/26 Q4	26/27 Q1	26/27 Q2	26/27 Q3	26/27 Q4	27/28 Q1	27/28 Q2	27/28 Q3	

5	GOVERNANCE: Practice ethical and sustainable governance that demonstrates fiscal responsibility and sustainability													
5.1	Land & Leases	A	Review of existing leases and contracts, including the undertaking of rent reviews	Sep-26	Full Council	<u>Assets & Contracts Manager</u>								
		B	Register all land owned by STC correctly at HM Land Registry	Sep-26										
5.2	Financial Management	A	Identify areas of STC governance practice for review and improvement	Mar-26	F&GP	Finance Manager, <u>DTC</u> & Town Clerk								
		B	Carry out internal audit and implement recommendations	Jul-26										
		C	Undertake a 'peer review' of STC's performance and management	Jan-27										
		D	Confirm priorities for CIL spending plans (Oct-26 refresh to dictate next steps)	Oct-26										
5.3	Policy & Risk Management	A	Review all STC policies and identify priority list of those that need creating / reviewing / updating	Dec-25	Personnel/ F&GP	Policy & Risk Officer, HR Manager, <u>DTC</u> & Town Clerk								
		B	Develop, seek approval, and implement policy creation, review and update for all policies	Mar-27										
		C	Update, maintain and publish Risk Register, alongside establishment of SMT quarterly review of risk register	Mar-26										
		D	Develop / test BCP for continued operation of STC in the event of fire, flood, building loss, cyber attack, etc	Jun-26										
5.4	Back Office Digitalisation	A	Establish options for digitalising and modernising processes, including base lines and improvement aspirations	Mar-26	F&GP	<u>DTC</u> & Town Clerk								
		B	Commission best option/s, following on from approval	Jul-26										
		C	One year comprehensive review of efficacy and improvements gained from new option/s, alongside lessons learned	Jul-27										

Strategy	Ref	Goal (Specific, Measurable, Achievable)	Realistic Timeframe	Committee Oversight	Lead Officers (<u>main</u> <u>contact</u> <u>underlined</u>)	Progress RAG Rating								Latest Update
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6	CLIMATE: To help create a sustainable Seaford, resilient to the effects of climate change													
6.1	Climate Action Plan & Climate Emergency Policy	A	Working Group and officers to pull together final proposals and obtain approval from Committee and Full Council	Apr-26	GOSCA	<u>HOP</u>								
		B	Ensure all features from Climate Action Plan are succesfully rolled out (Oct-26 refresh to dictate next steps)	Nov-27										
6.2	Fields in Trust	A	Establish pros and cons of Fields in Trust and bring paper to Full Council enabling informed decision	Jan-26	Full Council	<u>Assets & Contracts Manager</u>								
		B	Subject to approval of proposal, rollout Fields in Trust status to Martello Fields, The Crouch and The Salts	Jun-26										
		C	Consider Fields in Trust status on other land, including applicable land acquired from LDC's asset devolution agenda	Jan-27										
6.3	Chalk Paths - Seaford Head Estate	A	Restoration of chalk paths on route past Coastguard Cottages, consideration given to sinking fund to restore five-yearly	May-27	GOSCA	Operations Manager & <u>HOP</u>								
		B	Work alongside ESCC for restoration of chalk footpath from Splash Point to Seaford Head via external funding	Apr-27										
		C	Restoration of path and improvements to access and conservation at High & Over in conjunction with SDNPA and NT	Mar-27										
6.4	Cliff Gardens	A	Establish a Memorandum of Understanding with SDNPA & SCP. Provide SDNPA with a Licence to Occupy	Oct-25	GOSCA	Senior Projects Officer & <u>HOP</u>								
		B	Assist and oversee the delivery of the Cliff Gardens project - delivered by SDNPA but with STC project officer oversight	Jun-26										
		C	Establish Management & Maintenance (M&M) framework with SCP. Implement M&M to oversee ongoing maintenance	Sep-26										

Glossary of acronyms:

- A&F** Assets & Facilities Committee
- BCP** Business Continuity Plan
- CIL** Community Infrastructure Levy
- Comm. Eng. Manager** Community Engagement & Democratic Services Manager
- DTC** Deputy Town Clerk & Responsible Financial Officer
- EP** Emergency Planning / Plan
- ESCC** East Sussex County Council
- F&GP** Finance & General Purposes Committee
- GOSCA** Golf, Open Spaces & Claimte Action Committee
- HLF** Higher Level Funding
- HOP** Head of Place
- LDC** Lewes District Council
- M&M** Management and maintenance
- NT** National Trust
- Q** Quarter (of the year)
- RAG** Red, Amber, Green rating
- RPA** Rural Payments Agency
- SCP** Seaford Community Partnership
- SDNPA** South Downs National Park Authority
- SHB** South Hill Barn
- SMT** Strategic Management Team
- SRF** Sussex Resilience Forum
- STC** Seaford Town Council
- WCAG** Web Content Accessibility Guidelines
- WG** Working Group



Seaford Town Council

Report No:	87/25
Agenda Item No:	14
Committee:	Full Council
Date:	23 October 2025
Title:	Seaford Town Football Club Working Group Recommendations – Permissions for Gates, Floodlights and Adverts
By:	Peter Cousin, Head of Place
Purpose of Report:	To present the recommendations of the Seaford Town Football Club Working Group in relation to the use of the floodlights, closure of the gates and display of adverts by the Football Club within The Crouch

Actions
Full Council is advised:
1. To consider the contents of the report and the recommendations of the working group in relation to the following: a) Use of the floodlights b) Closure and locking of the gates, and c) Displaying of adverts 2. To move to a vote on the motions below.

Recommendations
Full Council is recommended:
1. To note the contents of the report. 2. To consider the recommendations of the working group, set out within section 3 of the report, as follows:

a. Floodlights

- i. That STC approves Seaford Town Football Club's (STFC) continued use of the floodlights in accordance with the planning permission LW/22/0739, subject to STFC informing STC in advance when the lights are to be used.

b. Adverts

- i. That, in accordance with STFC's lease, and subject to advertising consent LW/22/0740, STC continues to allow the display of adverts on the football stand until 7 August 2028.
- ii. That STC's Inspector (or suitable other officer, as required) will undertake a weekly inspection of the adverts fixed to the pitch side barriers and metal infill barriers and, where any areas are deemed to represent a health and safety risk, STC will require STFC to remove the danger within 24 hours. If the removal is not undertaken within 24 hours, STC will arrange for the work to be carried out themselves and will recharge STFC for the cost of this action.
- iii. In relation to the pitch side barrier and metal infill barriers and adverts that are deemed to be safe, these will be permitted to remain in situ until the end of the football season in May 2026. After this time, and until 7 August 2028, STC will require all adverts to be removed and henceforth for them to only be displayed during periods where they have hired the pitch – with adverts being erected and taken down on the day of hire. If the removal of the current adverts is not undertaken within seven days of the end of the football season, STC will arrange for the work to be carried out themselves and will recharge STFC for the cost of this action.

c. Gate Closures

- i. That STC understands that gates have to be shut during matches to comply with Football Association rules and are content to allow this to continue, subject to the below conditions being implemented and only during the period of matches where the gates are required to be locked closed by the football league.
- ii. STFC installs an intercom system on all gates at their own cost (specifications to be agreed in advance with STC officers).
- iii. That adequate signage must be displayed and maintained on both sides of the gates notifying the public of upcoming games and how they should alert someone to come and open it for them if they are locked in/out.

- iv. That emergency exit / panic push-bar type mechanisms will be installed by STC on the inside of each gate to allow swift crowd escape from The Crouch in the event of an incident that caused a mass evacuation from the site, to prevent a crush situation.
- v. That, with regards to timescales:
 - 1. until the emergency exit / panic push bar solution is installed, STFC must provide a volunteer to stand by each gate throughout the time they are locked ready to unlock them as necessary.
 - 2. if the intercom system and notices are not put in place by 30 November 2025, STC will withdraw the permission to close the gates and will change the padlocks/locks.

1. Introduction

- 1.1** Full Council is being asked to consider the recommendations of the Seaford Town Football Club Working Group (WG) in relation to permissions for the use of the floodlights, closure/locking of the gates, and display of the adverts by Seaford Town Football Club (STFC) within The Crouch.
- 1.2** This report sets out an overview of the background to this matter, an overview of the STFC WG considerations, and the subsequent recommendations that Full Council is now being asked to consider.

2. Background

- 2.1** In November 2022, STFC submitted planning applications to Lewes District Council (LDC) seeking permission to use the floodlights within The Crouch and display advertising on the pitch side barrier around the Crouch football pitch and on the football stand.
- 2.2** In August 2023 both planning permissions were granted, subject to conditions (further details are set out within this report).
- 2.3** In addition to planning permission, STFC was also required to gain Seaford Town Council's (STC) approval, as landowner. Whilst the above process was underway, STC took the stance that it would wait until the planning applications had been determined by LDC before considering whether or not it was going to grant approval as landowner. Full Council subsequently met in September 2023 to discuss the requests from STFC, the planning permissions granted and associated conditions, and whether or not STC itself would permit these

activities. In addition to this was consideration of a third request from STFC seeking STC's permission to close and lock the gates within The Crouch during match times.

- 2.4** There was a lengthy discussion by Full Council on these matters which resulted in the following outcomes:
- (a)** The adverts, use of floodlights and closing of gates were approved for an initial nine-month period i.e. until June 2024, and
 - (b)** The WG was established to further consider these matters (the gates, floodlights and adverts) and report back to Full Council within six months i.e. ahead of June 2024 and the expiry of the above temporary permissions.
- 2.5** Throughout the above timeline was a period of significant unrest for different users of The Crouch, resulting in a number of concerns, complaints and Freedom of Information requests being submitted to STC around the situation. These communications continued at a regular frequency and level of intensity until late-summer 2024.
- 2.6** In late-2023/early-2024, the decision was made to prioritise the handling of the complaints STC had received in relation to these matters onsite and delay the WG recommendations until these complaints had been resolved.
- 2.7** The WG did not reconvene to discuss these matters in 2024 and, as a result, STFC's operations onsite at The Crouch have rolled on in accordance with the initial permissions granted having not received instructions to the contrary.
- 2.8** Recognising the importance of bringing this to a conclusion, the WG was recently reconvened, meeting on 16 September and 25 September 2025, to discuss these matters and agree the WG's recommendations to Full Council. The WG consisted five councillors supported by the Town Clerk and Head of Place.

3. Seaford Town Football Club Working Group Discussions

- 3.1** Due to the urgency of this work, the WG covered a significant amount of ground during its meetings, including:
- (a)** Reviewing the original papers presented to Full Council in September 2023 to clarify the issues at hand, the scope of the WG and the planning permissions that had been granted by LDC (the September 2023 Full Council papers are included at **Appendix A**).

- (b) Clarifying the current situation onsite, what had happened in the intervening time since September 2023, and that the issues were still predominantly as reported to Council in 2023.
 - (c) Discussing each matter in great depth, with further details on this set out further in the report below.
 - (d) Agreeing recommendations on each matter for consideration by Full Council.
- 3.2** In terms of the specific matters to be covered, the key discussion points of the WG were as follows:
- 3.3** Floodlights
- 3.4** Based on councillor communications and interactions, feedback is that the public seem happier with the floodlights and STFC being more mindful with timings. STFC is also in the habit of telling STC when floodlights are going to be used, in accordance with the process agreed.
- 3.5** A query was raised around whether the floodlights can be used on a Sunday / Bank Holiday – it was confirmed the planning permission does not allow this.
- 3.6** The WG discussed that, providing STFC continues to let STC know when they are to be used, the WG would recommend that STFC can operate the floodlights in accordance with the planning permission until 7 August 2028 (aligning with the expiry date of the advertising consent). After which, further permission must be sought from STC and LDC by STFC.
- 3.7** Adverts
- 3.8** The adverts are in two locations: on the stand (allowed for within the lease) and on the current pitch surround barrier (subject to discretionary STC approval).
- 3.9** The WG discussed that there are several considerations:
- (a) Think about principles: amenity for residents versus the financial and sporting viability of the club and finding a balance between the two. A commercial value versus social value.
 - (b) Think about precedent for the rest of STC's assets in the absence of any applicable policy.
 - (c) Should STC be considering a change to the barriers/adverts mid-season or is this unreasonable due to the likely disruption to STFC?
 - (d) The white handrail barrier is STC's but the metal infill barriers underneath (housing the adverts) were installed by STFC following a grant from STC.

- (e) The current adverts are affixed to the barrier in way they cannot easily be erected and taken off on a regular basis.
- (f) STFC has shared concerns about a lack of volunteers to carry out the erection and removal of adverts for each match.
- (g) There are two issues at play – the current barrier and adverts, and the longer-term replacement of the barrier. It is necessary to separate the two for the purposes of the WG's recommendations to Full Council – the WG needing to consider adverts on the current barrier.

3.10 The WG discussed that there are a number of concerns with the current barriers and adverts:

- (a) Health & Safety issue – the danger of adverts and spindles from the infill barriers flying/coming off and risks posed to any users of the site.
- (b) Liability / Insurance – STC would likely be held liable for any accidents and/or incidents caused by the adverts/spindles.
- (c) Public Perception & Accessibility – the adverts may be viewed as an eyesore and inconvenience for residents.
- (d) Reputational - people are frustrated by the retrospective nature of this review and STC's historical lack of authority over the matters.
- (e) Financial - adverts generate income for STFC, but STC levies no charge for this and receives no compensation for it.
- (f) Comparators – Crouch Bowling Club erect and remove adverts for matches only and STFC used to use pop up adverts during matches. The same guidance has been applied to sports clubs based at The Salts.
- (g) Policy – there is no specific policy for the display of adverts on Town Council property (except where stipulated in a lease). However, a consistent approach of temporary adverts being permitted during pitch hire has been enforced.

3.11 The WG discussed a number of options that are available in relation to the adverts and the metal infill barrier that they are attached to, ranging from requiring the adverts to be removed immediately for the rest of the season except on match days, through to allowing the adverts to remain as they are for the rest of the season and then introduce any changes.

3.12 Ultimately, the WG was led by the health and safety risks of the metal infill barriers, the fact that these continue to deteriorate (for a number of reasons –

football's impact, possible vandalism, age and corrosion) and the ongoing risk that this poses to all users of the site. The WG agreed that any option would need to be taking reasonable steps to mitigate the health and safety risks.

3.13 The WG discussed the impact of any required changes to current process on STFC, the reasonableness of timescales for implementing these and options for hearing representations from STFC on the proposals.

3.14 During the discussion, it was confirmed that officers need a clear steer on how to manage the situation going forwards, to also enable a working relationship to be maintained with STFC. The key will be ensuring reasonableness with a firmness and enabling STC to take action if STFC are not complying. This will also help ensure a consistent approach across all sports clubs.

3.15 Following an in-depth discussion of the above options and points raised, the group agreed the following recommendations:

- (a)** In accordance with STFC's lease, to continue to allow the display of adverts on the football stand until 7 August 2028.
- (b)** That STC's Inspector (or suitable other officer, as required) will undertake a weekly inspection of the adverts and metal infill barriers and, where any are deemed to be a health and safety risk, will require STFC to remove this within 24 hours. If the removal is not done within 24 hours, STC will arrange for the work to be carried out and recharge STFC for this.
- (c)** In relation to the adverts and metal infill barriers that are deemed to be safe, these will be permitted to remain in situ until the end of the football season in May 2026. After this time, STFC will need to remove the adverts and only display these during periods where they have hired the pitch – putting them up and taking them down on the day of hire. If the removal of the current adverts is not done within seven days of the end of the football season in May 2026, STC will arrange for the work to be carried out and recharge STFC for this.

3.16 Gates:

3.17 The WG discussed a solution to aid with the operational logistics of the gate closures and take on board STFC's feedback about struggling with volunteers to staff the gates during matches:

- (a)** This would see STFC either installing an intercom system, allowing members of the public to 'ring the bell' when they wanted to enter the site,

which is linked to one central walkie talkie that would be held by an STFC volunteer who would then go and open the gate **OR** recruiting additional volunteers to ensure each of the gates are staffed. STC would reinforce the need for signage on both sides of the gates notifying of games and gate closures and how to get them open if this is needed.

- (b) The WG agreed that without a system like this in place, STC would have to stop the closure and locking of the gates.
- (c) STFC would be reminded that the gates are only to be closed when required by the football league for home matches.

3.18 The WG summarised that it understands that gates have to be shut during matches and are content to continue to allow this, subject to one of the above solutions being implemented, which satisfies STC's requirements.

3.19 In addition to the above, the WG had an in-depth discussion around the safety of the gates for those within The Crouch needing to use the gates in an emergency to exit the site. In particular, the gate by the Mercread Centre, but realistically impacting all gates.

3.20 The WG discussed requiring emergency exit mechanisms to be added to all the gates by STC, which would enable users of the site to safely and easily exit as required. In the interim, STFC will be given permission to lock the gates during matches, as required, but will need to ensure that each gate is staffed throughout the closure.

3.21 In the longer term, the emergency exit mechanisms will assist with STC complying with the requirements of Martyn's Law (anti-terrorism legislation due to be brought in that relates to public and community events). The WG also discussed that STC may review the hire fees onsite due to the new infrastructure that would be in place.

4. Lessons learned

4.1 STC has already made significant changes to try and avoid such a situation as the above being able to reoccur and improve its handling should such situations occur. This has included:

- (a) increasing the staff headcount to enable greater focus on:
 - i. partner and stakeholder relations and communication,

- ii. the requirements of STC as a landowner in balancing the needs of the various users and ensuring enforcement actions are taken where necessary,
 - iii. a dedicated staff member handling complaints,
 - iv. STC's legal obligations as a landowner,
 - v. policy work to ensure both a consistent approach (e.g. with advertising on STC's assets) and clarity of processes (e.g. with the complaints process)
- (b) stakeholder group meetings have also continued to be held to enable the key stakeholders of certain sites to come together with STC to discuss the site, any concerns or opportunities, future plans, etc.

5. Financial Appraisal

- 5.1** The installation of the emergency exit mechanisms on all gates will be the responsibility of STC. The exact costs require further investigation due to the different types of gates in situ. Officers anticipate this to be in the region of £500 - £1,000 and able to be met from The Crouch Building Maintenance budget.

6. Contact Officer

- 6.1** The Contact Officer for this report is Peter Cousin, Head of Place.

Report 74/23 - Full Council 21-Sept-23



Seaford Town Council

Report No:	74/23
Agenda Item No:	12
Committee:	Full Council
Date:	21st September 2023
Title:	Floodlights, Adverts & Gates – The Crouch
By:	Town Council Management Team
Purpose of Report:	To provide information for Full Council to consider floodlights, adverts and gates at The Crouch

Recommendations

Full Council is recommended:

1. To note and discuss the contents of the report.
2. To approve the Football Club displaying advertisements in accordance with planning permission granted (LW/22/0740).
3. To approve the Football Club operating the floodlights in accordance with the planning permissions granted (LW/22/0739).
4. To approve the concept of closing gates to The Crouch at certain times to facilitate the needs of the Football Club during matches – in accordance with the specifics to be agreed as set out within report XX-23.
5. To delegate power to the Head of Assets, Projects and Services, in consultation with the Chair of the Town Council and Chair of Community Services, to work with the Football Club and other users of the site to agree the most effective and reasonable operational details of the gate closures.

1. Introduction

- 1.1 This report is presenting three requests from Seaford Town Football Club ('the Football Club') relating to the Crouch Gardens.

2. Advertisements

- 2.1** In November 2022, the Football Club submitted a planning application to Lewes District Council seeking retrospective permission to fix advertising boards to the pitch side barriers and fascia signs to the football stand.
- 2.2** This application was determined by Lewes District Council's Planning Committee in July 2023.
- 2.3** Permission was granted, with conditions attached to ensure compliance with planning regulations and public amenity and safety. The decision notice is attached at Appendix A.
- 2.4** The key relevant conditions for the Town Council to be aware of are translated as:
1. The permission lasting for 5 years, at which point further consent needs to have been given or signage shall be removed.
 2. No further adverts will be added without advertising consent. The permission granted relates solely to the plans submitted with the planning application (see the link at 2.5 below for access to the application documents).
 3. The Football Club are to make a photographic and positional plan of the existing adverts (on pitch barriers and football stand) and submit this to the District Council within one month of permission being granted.
 4. The District Council will need to agree, in writing, the advertisement fixings being used to ensure they are secure.
 5. No external or internal advertisements will be illuminated.
 6. All advertisements and the site displayed on will be kept clean and tidy and not impair the visual amenity of the site.
 7. The structure or hoarding displaying the advertisements will be kept in a safe condition and not endanger the public.
 8. No advertisements will be sited or displayed without permission of the landowner (the Town Council) or any other person entitled to grant permission (not relevant in this instance).
 9. No advertisements will be sited or displayed that would hinder the operation of any devices on site for the purpose of security or surveillance (CCTV).

- 2.5** Full details of the planning application and subsequent granted permission can be found on the District Council's Planning Portal, [application reference LW/22/0740](#).
- 2.6** Full Council should also be aware of a number of public objections submitted to the District Council relating to this planning application.
- a. The written objections can be viewed on the [District Council's Planning Portal](#), and
 - b. The webcast of the District Council's meeting – and the objections raised verbally at this meeting – can be viewed on the [District Council's Committee meeting webpage](#).
- 2.7** Following planning permission being granted, the Football Club has submitted a request to the Town Council, as landowner. The request from the Football Club is for the Town Council to give permission for the Football Club to display the advertisements in accordance with planning permission granted.
- 2.8** The Football Club has informed the Town Council that, as per the conditions with the planning permission, a plan of the adverts has been submitted to the District Council. The District Council has also advised that that the Football Club needs to ensure that all advert fixings are changed to permanent fixtures i.e. no cable ties.
- 2.9** Full Council is now being asked to consider whether or not it grants permission to the request set out at 2.6.

3. Floodlights

- 3.1** In November 2022, the Football Club submitted a planning application to Lewes District Council seeking permission to vary the conditions relating the planning permission previously obtained in 2010 for use of floodlights. The variation sought was to permit up to 22 floodlit matches – increased from 12 matches - and the associated times.
- 3.2** This application was determined by Lewes District Council's Planning Committee at the same meeting as the advertisements, in July 2023.
- 3.3** Permission was granted, with conditions attached to help safeguard nearby residential amenity. The decision notice is attached at Appendix B.

- 3.4** Full details of the planning application and subsequent granted permission can be found on the District Council's Planning Portal, [application reference LW/22/0739](#).
- 3.5** Full Council should also be aware of a number of public objections submitted to the District Council relating to this planning application.
- a. The written objections can be viewed on the [District Council's Planning Portal](#), and
 - b. The webcast of the District Council's meeting – and the objections raised verbally at this meeting – can be viewed on the [District Council's Committee meeting webpage](#).
- 3.6** The lease grants the Football Club the right to erect and use floodlights, subject to: planning permissions being sought, being kept in a state of good repair and condition, and landowner permission being granted (not to be unreasonably withheld).
- 3.7** Following planning permission being granted, and in accordance with its lease, the Football Club has submitted a request to the Town Council, as landowner.
- 3.8** The request from the Football Club is for the Town Council to give permission for the Football Club to operate the floodlights in accordance with the planning permissions granted.
- 3.9** Full Council is now being asked to consider whether or not it grants permission to the request set out at 3.8.

4. Gate Closures

- 4.1** As a club within the Football Association's National League System, there are certain ground grading requirements to be met – these relate to provisions such as the clubhouse, toilets, perimeter boundaries, spectator access and so forth. Closing certain gates to The Crouch enables the Football Club to ensure that it is in control of spectator access.
- 4.2** Some years ago, the Town Council granted for a set number of gates to be closed for a maximum number of times per year, and with conditions attached e.g. the gates being supervised or clear signage about the closure being displayed.
- 4.3** It has been a number of years since the closures were last reviewed and as such, discussions have been taking place with the Football Club to

ascertain what arrangements they would like to see in place with the gates. The Town Council is also aware of a number of concerns raised by some residents relating to the gate arrangements.

- 4.4** Following on from this, it is vital to be mindful of the impact of the closures on other users of the site, to ensure the arrangements are fair and reasonable.
- 4.5** Due to the nature of football fixtures, there can be short notice postponements and rescheduling of matches. As such, it is recommended that Full Council delegates power to officers to be able to discuss and agree the gate arrangements directly with the Football Club. Full Council is however recommended to provide its approval of the concept of gates being closed, with officers then able to work with the Football Club – in consultation with the Chairs as per the motion - and other users of the site to agree the most effective and reasonable operational details of the closures.
- 4.6** The current request from the Football Club is to shut the gates to the eastern part of The Crouch – so not the gates from East Street, beside the entrance to the Bowling Green or from Mercread Road to beside the play area – on men's first team match days. The closures would start half hour before the match and gates opened again at half time.
- 4.7** Officers are intending, subject to Full Council approval at this meeting, to allow the gate closures as per 4.7 above on a trial basis.
- 4.8** During the initial trial period, there will be a period of public consultation to allow feedback on the gate arrangements from residents and the Town Council will be mindful of this consultation when it considers the results of the trial.
- 4.9** Officers will also ensure that the relevant risk assessments are undertaken to identify steps to mitigate any risks that may be involved.
- 4.10** Officers would report back to the Community Services Committee on how the trial basis has gone and overview of arrangements to be implemented, once known.

5. Fence Petition

- 5.1 Elsewhere on this agenda is a petition submitted against a previous proposal by the Football Club to erect a fence around the perimeter of the football pitch.
- 5.2 For clarity, this petition does not directly relate to the requests above but is deemed appropriate to be presented to, and discussed at, the same meeting where other Football Club matters are being considered.

6. Financial Appraisal

- 6.1 There are no direct financial implications as a result of this report.

7. Contact Officer

- 7.1 This report has been presented by the Town Council's Management Team.



Lewes District Council

Planning Services

Southover House, Southover Road, Lewes, East Sussex, BN7 1AB

Tel: 01273 471600 Fax: 01273 484452 Minicom: 01273 484488

www.lewes-eastbourne.gov.uk DX No. 3118 Lewes-1

Ian Fitzpatrick - Director of Regeneration and Planning

Appendix A

Mr T Webster
Seaford Town Football Club
c/o Mr M Greve
G3 Architecture
26 Sutton Park Road
Seaford
BN25 1QU

LW/22/0740

Town and Country Planning Act 1990

Town and Country Planning (Control of Advertisements) (England) Regulations 2007

Consent to Display an Advertisement

In pursuance of their powers under the above-mentioned Act and Regulations, Lewes District Council hereby notify you that it **GRANTS** express consent to display (an) advertisement(s) for the following development.

Advertisement Consent Application for Various business advertisement boards fixed to the pitch side barriers, fascia signs to the football stand

At Seaford Football Club Bramber Road Seaford East Sussex

Parish: Seaford

to be carried out in accordance with Plan and Application No. LW/22/0740 submitted to the Council on 4 November 2022.

By virtue of Regulation 14 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007, this consent lapses at the expiration of **FIVE YEARS** from the date of consent.

To meet the requirements of Regulation 14 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 this permission shall meet the following standard conditions:

(a) Any advertisements displayed, and any site used for the purpose of the display of advertisements, shall be maintained in a clean and tidy condition so that it does not impair the visual amenity of the site.

(b) Any structure or hoarding erected or used principally for the purpose of displaying advertisements shall be maintained in a safe condition that does not endanger the public.

(c) Where any advertisement is required under the said Regulations to be removed, the site is to be left in a safe condition that does not endanger the public and in a reasonably clean and tidy condition so that it does not impair the site's visual amenity.

(d) No advertisement shall be sited or displayed without the permission of the owner of the site (this includes land or buildings where the advertisement is displayed), or any other person with an interest in the site entitled to grant permission.

(e) No advertisement shall be sited or displayed that would render hazardous the use of any highway, railway, dock, harbour, waterway or aerodrome (civil or military); or obscure, or hinder the ready interpretation of, any road traffic sign, railway signal or aid to navigation by water or air; or hinder the operation of any device used for the purpose of security or surveillance (such as closed circuit television cameras) or for measuring the speed of any vehicle (speed cameras or other speed-measuring devices).

The application is also subject to the following specific conditions:

1. This decision relates solely to the following plan(s):

<u>PLAN TYPE</u>	<u>DATE RECEIVED</u>	<u>REFERENCE</u>
Design & Access Statement	3 November 2022	Design & Access Statement
Existing Elevation(s)	3 November 2022	2000.S03 - Existing Football Stand + Pitch Barrier Elevations
Existing Layout Plan	3 November 2022	2200.S01 - Existing Site Layout Plan
Location Plan	3 November 2022	2200.LP01 - Site Location Plan
Existing Block Plan	3 November 2022	2200.BP01 - Existing Block Plan

Reason: For the avoidance of doubt and in the interests of proper planning.

2. This consent shall expire 5 years from the date of this notice whereupon the signage shall be removed and any damage repaired unless further consent to display has been given by the Local Planning Authority.

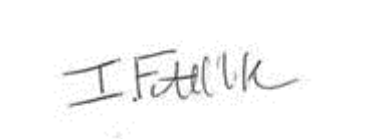
Reason: To accord with Regulation 14(7) of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 and for the purposes of amenity and public safety.

3. No further adverts will be added to the ground. No adverts will be externally or internally illuminated. No further adverts will be installed without advertisement consent.

A photographic and positional plan record will be made of the existing adverts on the football stand and pitch barriers and submitted to the Planning Authority within 1 month of this permission.

All Advertisement fixings to also be agreed in writing by the Local Planning Authority to ensure they are secure.

Reason: To comply with LP 2 DM31 policy on Advertisements and to ensure public amenity and safety

A rectangular box containing a handwritten signature in dark ink. The signature appears to read 'I Fitzpatrick'.

Ian Fitzpatrick
Director of Regeneration and Planning
Lewes District Council and Eastbourne Borough Council

Date: 8 August 2023

Please read the attached notes.

Note to applicant

Permission is granted subject to due compliance with The Building Regulations and general statutory provisions in force in the area and nothing herein shall be regarded as dispensing with such compliance and shall not be taken as granting any licence or approval for any other purposes whatsoever.

Your attention is drawn to the Party Wall Act 1996 and your responsibilities to your neighbours under this legislation.

Note:

The right to appeal

1. You have a right to appeal against the Local Planning Authority's:-
 - a) refusal of consent for an advertisement;
 - b) grant of consent for an advertisement subject to a condition with which you are dissatisfied
 - c) failure to issue a decision on an application with a specified time (namely 8 weeks from the date the application is formally acknowledged or such longer period you may have agreed in writing with the Council), provided the Council have not given you notice that they have declined to determine your application under the provisions of Section 70A of the Town and Country Planning Act 1990; or
 - d) 'Discontinuance Notice' requiring you to remove an advertisement or stop using an advertisement site.

The appeal is made to the Secretary of State and the procedure is very similar to the procedure for a planning appeal to the Secretary.

The choice of appeal procedure

2. There is a choice of two appeal procedures and the Planning Inspectorate will co-operate with you, or your agent, in enabling your appeal to be processed and decided in the way you would prefer. But the Planning Inspectorate may occasionally have to use a procedure which is not your own preference, in order to ensure that all aspects of the appeal are thoroughly and fairly considered. When this happens the Planning Inspectorate will explain why.
3. From the outset of an appeal you should give *precise* grounds of appeal. This enables the Local Planning Authority in their written statement to answer the relevant points and thus avoid unnecessary delays. You will be given the opportunity to respond to their representations.
4. The available appeal procedures are:
 - a) by written representations which you and the Local Planning Authority make, followed by (i) an *unaccompanied* site-inspection of the appeal site; or (ii) no site-inspection, but with consideration of photographs of the appeal site, *provided you and the Local Planning Authority both agree in advance to this arrangement*.
 - b) by hearing of the parties' oral representations, and (usually) an accompanied site-inspection of the appeal site, which are then reported to the Secretary of State. You should note that if you opt for this procedure, you may be liable for award of the Local Planning Authority's appeal costs against you if you are found to have behaved 'unreasonably' in the appeal proceedings. Further advice is given in DOE Circular 23/91.

The address for advertisement appeals and appeal forms

5. All advertisement appeals have to be submitted to the Secretary of State within 8 weeks of the receipt of the Local Planning Authority's decision against which you are

appealing. To appeal you should complete the official appeal form Form DOE 14075B for your appeal. These are specially designed, 3 part appeal forms using a copying process requiring no carbon paper. Please read the notes for guidance carefully *before* completing the forms. Form DOE 14075B can be obtain from this address:-

The Planning Inspectorate, Customer Service Team, Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN

The telephone number is: (Tel: 0303 444 5000) if you need more information or advice from the Planning Inspectorate. The fax number for urgent communications is 0117 372 8182.

6. On completion of the forms they should be returned as follows:-
 - a) white copy, to the Planning Inspectorate as the address above
 - b) yellow copy, to the Local Planning Authority against whose decision you are appealing
 - c) blue copy, for your own records.



Lewes District Council

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Ian Fitzpatrick - Director of Regeneration and Planning

Appendix B

Mr T Webster
Seaford Town Football Club
c/o Mr M Greve
G3 Architecture
26 Sutton Park Road
Seaford
BN25 1QU

LW/22/0739

Town and Country Planning Act 1990

**Town and Country Planning (Development Management Procedure)
(England) Order 2015**

Notice of Variation of Planning Condition

For: Amended description vary condition 1 of planning permission LW/10/0783 to permit up to 22 floodlit matches. Restriction on latest time of use to remain the same at 21:50 hours

At: Seaford Football Club Bramber Road Seaford East Sussex

Parish: Seaford

In pursuance of its powers and duties under the above-mentioned Act and Order, the Council hereby **GRANTS** Planning Permission for the above development in accordance with the plans and particulars submitted with your application received on 3 November 2022

The application is subject to the following conditions:

1. This decision relates solely to the following plan(s):

<u>PLAN TYPE</u>	<u>DATE RECEIVED</u>	<u>REFERENCE</u>
Location Plan	3 November 2022	2201.LP01 - Site Location Plan
Existing Block Plan	3 November 2022	2201.BP01 - Existing Block Plan
Technical Report	13 March 2023	88 point lux level test
Photographs	13 March 2023	Photos of floodlights in operation
Technical Report	13 March 2023	Ground grading guidance handbook
Additional Documents	13 March 2023	Covering letter

Reason: For the avoidance of doubt and in the interests of proper planning.

2. The floodlights hereby approved shall be used for up to a maximum of twentytwo (22) competitive evening games per football season (August - June). The Club shall provide advance written notification to the local planning authority of the dates when the 22 evening games are to be played. On each of the 22 evenings when games are played the floodlights shall not be illuminated after 9.50pm or after the completion of the competition event, (but only for the event purposes of "extra time or penalties" and not for any other purpose) and in any case with an absolute end of illumination on such occasions of 11pm.

Reason: To help safeguard nearby residential amenity, having regard to policies CP10 and DM25 of the Lewes District Local Plan and the NPPF

3. The floodlights hereby approved shall not be used for any purpose on Sundays, Bank or Statutory Holidays.

Reason: To help safeguard nearby residential amenity, having regard to policies CP10 and DM25 of the Lewes District Local Plan and the NPPF.

4. A maximum of four floodlight columns only shall be used on training sessions. On each of those evenings when training takes place the floodlights shall not be illuminated after 9pm.

Reason: To help safeguard nearby residential amenity, having regard to policies CP10 and DM25 of the Lewes District Local Plan and the NPPF.



Ian Fitzpatrick
Director of Regeneration and Planning
Lewes District Council and Eastbourne Borough Council

Date: 8 August 2023

Please read the attached notes.

Notes to applicant

Building Regulations – Your attention is drawn to the need for compliance with the Building Regulations and general statutory provisions in force in the area and nothing herein shall be regarded as dispensing with such compliance and shall not be taken as granting any licence or approval for any other purposes whatsoever. Your attention is

drawn to the Party Wall Act 1996 and your responsibilities to your neighbours under this legislation. Your attention is drawn to the provisions of Section 35 of the East Sussex Act 1981 regarding Access for Fire Brigade.



Seaford Town Council

Report No:	94/25
Agenda Item No:	15
Committee:	Full Council
Date:	23 October 2025
Title:	Seaford Health Stakeholders Group – Seaford Town Council Representation
By:	Isabelle Mouland, Community Engagement & Democratic Services Manager
Purpose of Report:	To appoint Seaford Town Council representatives to the Seaford Health Stakeholders Working Group

Actions

Full Council is advised:

1. To consider the contents of the report.
2. To move to a vote on the motions below.

Recommendations

Full Council is recommended:

1. To note the contents of the report.
2. To note the Terms of Reference for the Seaford Health Stakeholders Working Group at Appendix A.
3. To appoint up to four Seaford Town Council representatives to the Seaford Health Stakeholders Working Group.

1. Information

- 1.1** On 25 July 2024, the Town Council established the Seaford Health Stakeholders Working Group (this group was previously an Outside Body), agreeing its Terms of Reference and appointing two Town Council representatives to the Group.

- 1.2 The purpose of the Group is for Seaford Town Council to facilitate communication and engagement between stakeholders across health, social care, and health-related services across local communities including local people; to consider Seaford's health needs and assets with a view to identifying and improving health and wellbeing.
- 1.3 In recent meetings, this has included discussions around: health facilities within the town, access to mental health services for adults and young people, networking and shared problem-solving, and updates on activities, events and pressures / challenges experienced by the groups in attendance
- 1.4 The Group comprises of representatives from Seaford Town Council, East Sussex County Council, Lewes District Council, the Sussex Integrated Care Board, and other organisations delivering primary care, community health and social care, mental health and housing support, voluntary health and social support, and community and social enterprises.
- 1.5 This is an ongoing working group with no specific end date.
- 1.6 The Terms of Reference can be found at **Appendix A** and state that "Seaford Town Council representatives on the Group will be appointed annually at the Town Council's Annual Meeting"; unfortunately, this was overlooked at the Full Council meeting in May 2025 and this paper seeks to rectify that oversight.
- 1.7 Therefore, members are invited to consider putting themselves forward to join the Seaford Health Stakeholders Working Group.
- 1.8 The Group meets quarterly, usually on a Wednesday, 2-4pm in the Council Chamber, 37 Church Street, Seaford.
- 1.9 Full Council is recommended to appoint up to four Town Council representatives to the Group.

2. Financial Appraisal

- 2.1 There are no direct financial implications as a result of this report.

3. Contact Officer

- 3.1 The Contact Officer for this report is Isabelle Mouland, Community Engagement and Democratic Services Manager.



SEAFORD HEALTH STAKEHOLDERS GROUP TERMS OF REFERENCE

1. Purpose

Facilitation through Seaford Town Council of communications and engagement between stakeholders across health, social care, and health-related services across local communities including local people; to consider Seaford's health needs and assets with a view to identifying and improving health and wellbeing. This is an ongoing working group with no specific end date.

2. Membership

The membership of the Group will comprise of representatives from Seaford Town Council, East Sussex County Council, Lewes District Council, the Sussex Integrated Care Board, and other organisations delivering primary care, community health and social care, mental health and housing support, voluntary health and social support, and community and social enterprises.

The Town Council will keep a list of organisations invited to send representation to the Group. Any new organisation wishing to send representation to the Group can request so in writing to Seaford Town Council where it will be considered, in consultation with the Group's Chair.

Seaford Town Council representatives on the Group will be appointed annually at the Town Council's Annual Meeting.

3. Roles and Responsibilities

Members of the group will work together to ensure:

- Representation at meetings
- Identification of local needs and assets
- Fostering of collaboration
- Consideration of realistic solutions
- Championing of the network.

4. Meetings

- Quarterly, daytime meetings
- Chair is elected by the group, by consensus
- Meeting agendas are provided by the Chair through Seaford Town Council officers
- Minute taking is provided by Seaford Town Council officers.

5. Reporting

From time to time, it will be necessary for the Group to report information or make recommendations to Seaford Town Council.

Seaford Town Council representatives on the Group will be invited at each Town Council Full Council meeting to provide any updates or share information on current Group activities.

The Working Group will be invited by Seaford Town Council officers to submit an annual report at the Seaford Town Council Annual Meeting.

6. Amendment

This Terms of Reference may be amended, varied or modified in writing after consultation and agreement by members of the group and Seaford Town Council.



Seaford Town Council

Report No:	89/25
Agenda Item No:	16
Committee:	Full Council
Date:	23 October 2025
Title:	Chyngton Brooks Project – New Path and Associated Bench and Planting
By:	Peter Cousin, Head of Place, in conjunction with Amie Rai, Project Manager, South Downs National Trust
Purpose of Report:	To seek approval, subject to planning permission, from the Town Council for a new path and associated furniture and planting on Seaford Town Council land

Actions

Full Council is advised:

1. To satisfy itself regarding the proposal and the recommendation from the Golf, Open Spaces & Climate Action Committee to approve this.
2. Noting the slight difference to the proposed path discussed at GOSCA in June 2025.
3. To move to a vote on the motions below.

Recommendations

Full Council is recommended:

1. To approve, subject to planning permission, the new path and associated bench and planting, across Seaford Town Council land.
2. Subject to motion 1 being passed and the granting of the necessary permissions, to approve the Town Council adopting ownership of the new bench, fences and gates.

1. Project Overview

- 1.1 The Restoring Intertidal Habitats at Chyngton Brooks project, led by the National Trust in partnership with the Environment Agency, aims to restore 42 hectares of priority intertidal habitat at Cuckmere Haven, East Sussex. Through managed breaches along the western bank of the Cuckmere River, the project will enable tidal inundation and create a naturally functioning estuary, supporting biodiversity and aligning with strategic environmental goals.

2. Development & Objectives

- 2.1 The project supports nature recovery and has evolved through extensive research, design, and stakeholder engagement. Key goals include:
- (a) Restoring saltmarsh, mudflat, and saline lagoon habitats
 - (b) Improving tidal flow and reducing shingle blockages at the river mouth*
 - (c) Engaging communities on sustainable coastal change and climate resilience
 - (d) Supporting species diversity and ecosystem services like carbon storage and flood management

* Several studies have looked at various ways to model upstream flooding. There will be a reduction in upstream water levels and there will be a slight tendency for improved hydraulic efficiency on the ebb tide which should aid the mouth remaining clear of blockage by shingle for longer intervals than the present day.

- 2.2 The National Trust (NT) commissioned a study into the creation of salt marsh and mudflat at Chyngton Brooks in 2019, which was shared with the Cuckmere Estuary Group and is available as background to this report. This study was presented to the Golf, Open Spaces & Climate Action Committee (GOSCA) in June 2025 and can be viewed [online here](#) (page 130 onwards). The work was tendered and Royal Haskoning were the successful contractor. They have been working up the design of the breaches (see **Appendix A** of this report) and modelling impacts in order to submit a planning application.

3. New Footpath

- 3.1** An existing footpath FP27/b (the embankment footpath) will close as part of the project proposal to allow for five planned breaches that will create tidal inundation of Chyngton Brooks. The project supports a nature-led design, ensuring no new materials are bought on site. Nature based solutions are increasingly being supported by local and national restoration organisations and therefore, other options have not been deemed as viable.
- 3.2** It is recognised this is a well-loved site and it has been carefully considered how the planned breaches and flooding of the site will impact walkers. Flood mapping shows that there are sections of the Vanguard Way / King Charles III Coastal Path that will come under periodic flooding because of the managed breaches. Future models show that due to the low-lying gradient of the land, long-term sea level rises will flood sections of the Vanguard Way even without the project being in place. In recent years (2014 and 2024), storm surges have eroded the pathway and created a natural breach.

Fig 1. Breaching of flood embankment (2014)



Fig 2. Erosion of flood embankment (2024)



- 3.3** The alternative pathway offers long views of the landscape. The route has been tested and consulted on by many local stakeholders, most of whom have positively received the route, with adjustments reflected in the final route based on feedback.
- 3.4** The Town Council's tenant farmer supports the project and will adapt their management of the land to accommodate pathway use.
- 3.5** Planned signage will further act to inform walkers of changes to the route and flood information. Whilst one circular route is lost with the closure of the embankment, a circular route running across FP21/1 offers a year-round route.

4. Accessibility

- 4.1 Stiles will be replaced with gates to improve access and views, and the tenant farmer has been involved in discussions and is in agreement with the proposed accessibility changes. The new route has been designed with smooth gradients and clear transitions, as far as viable. Accessibility information will be shared on platforms like AccessAble, using practical language to enable visitors to decide on the suitability of the route.

5. Historic Features

- 5.1 The new path follows a historic route passing along the well, where it is proposed, a curved bench be installed to offer views and a resting place (a standalone bench not attached to the well). Other historic features at the site such as WWII camps are not along the alternative route. The path has been designed to avoid the flint wall along the farm track.

6. Ecology and Visual Impact

- 6.1 The proposal is for a mown pathway and selective scrub planting to preserve the landscape's character. A key aim of the project is to restore the site to a mosaic of mudflat and salt marsh, habitats known for their efficiency in carbon sequestration as well as providing a rich and much needed habitat for declining numbers of bird, fish and invertebrates.

7. GOSCA Consideration

- 7.1 A paper on the reroute of the footpath was previously considered by GOSCA on 5 June 2025, with the following motion passed:
- It was RESOLVED to APPROVE IN PRINCIPLE, the new path across Seaford Town Council land, subject to future planning permission being sought, and recommend approval, in principle, by Full Council.**
- 7.2 Since the GOSCA resolution there have been small changes to the route of the path, however, the STC Head of Place has walked the path with the National Trust's Project Manager, their lead ranger and the tenant farmer to review these changes and has agreed that the changes are very minimal. Cllr Bristow was also consulted as the Chair of GOSCA and was in agreement that the changes were not significant enough to take the matter

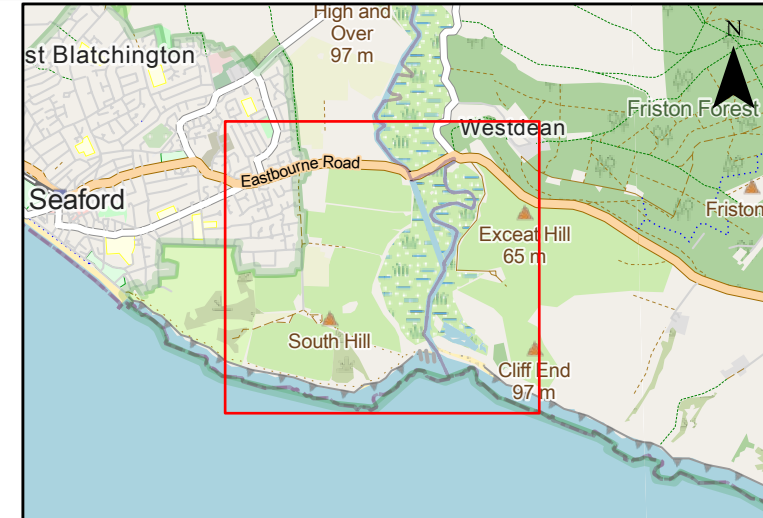
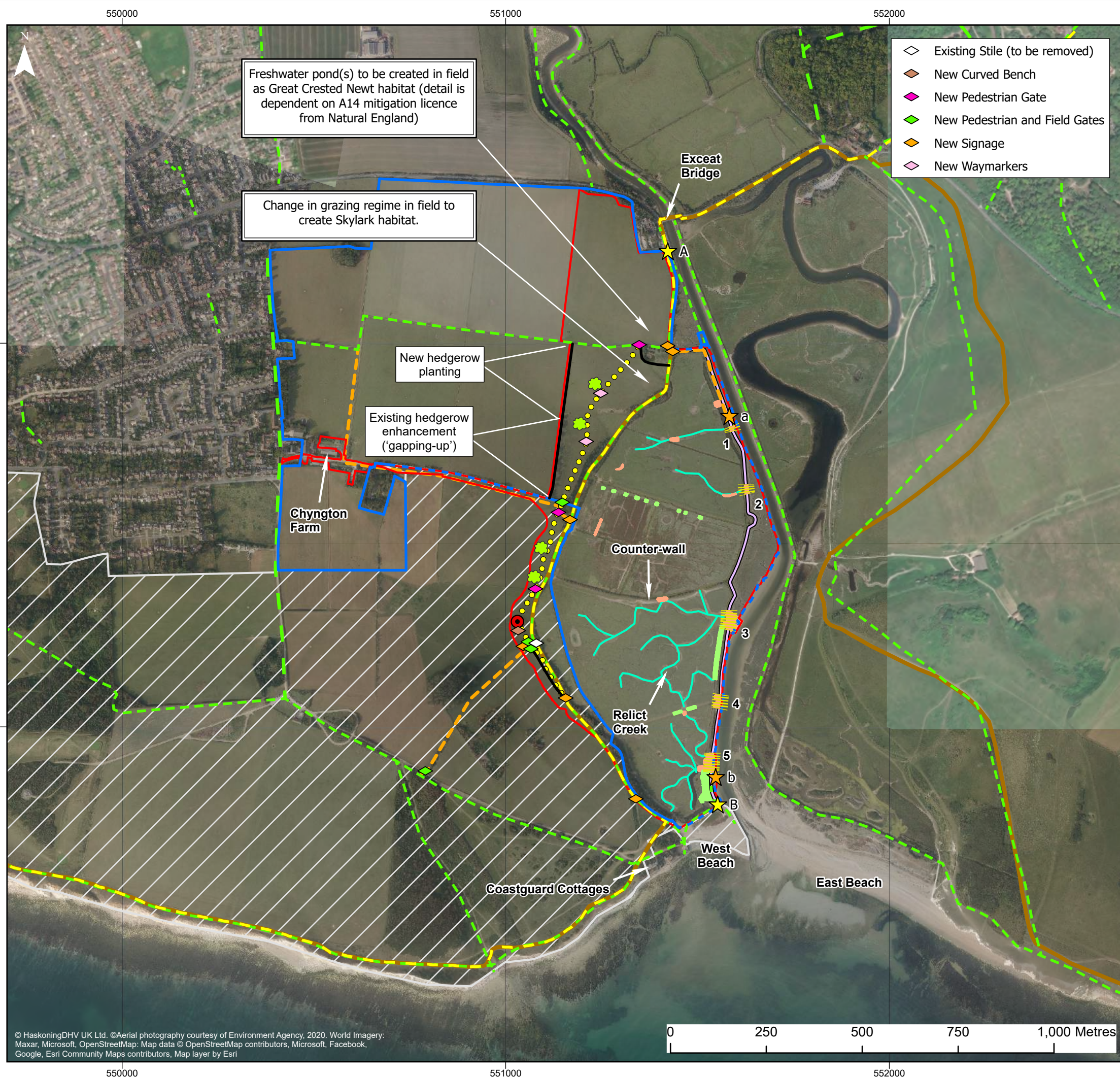
back to GOSCA for a fresh consideration and hence the GOSCA recommendation to Full Council stands.

8. Financial Appraisal

- 8.1** The National Trust has agreed to cover all reasonable costs associated with resurfacing, fencing, gates, the bench, signage and/or maintaining the path, alongside legal costs that may be incurred.
- 8.2** Whilst there would be no initial cost to the Town Council, it would mean adopting the bench, new fences and gates. As it stands, the fences and gates would be in significantly better condition than those currently elsewhere onsite, and thus maintenance costs would be budgeted for accordingly in future years. It is anticipated that around seven years after installation (the estimated lifetime of the bench before significant repairs are required), the Town Council would be asked to decide whether to replace or remove the bench and, again, could budget accordingly. In the interim, any other costs should be nominal, including the impact on the Town Council's public liability insurance premium.

9. Contact Officer

- 9.1** The Contact Officer for this report is Peter Cousin, Head of Place.



Legend

- Red Line Boundary
- Blue Line Boundary (National Trust owned land)
- Seaford Town Council Land Ownership
- King Charles III England Coast Path
- Vanguard Way
- Public Footpath
- Public Bridleway
- Permissive Way
- Remaining West Flood Embankment
- Existing Relict Creek
- Works - Breaches 1 - 5
- New Footpath
- Stopped-up Public Footpath A-B
- Dead-end Stubs a-b
- Well
- Scrub Planting
- Cut
- Fill
- New Fence (see Landscape and Ecological Management Plan)

Client:	Project:
The National Trust	Restoring Intertidal Habitats at Chyngton Brooks

Title: **Proposed Site Plan**

Figure: 1.3

Revision:	Date:	Drawn:	Checked:	Size:	Scale:
2	26/08/2025	TC	NJC	A3	1:10,000
1	18/08/2025	TC	NJC	A3	1:10,000

Co-ordinate system: British National Grid



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Seaford Town Council

Report No:	88/25
Agenda Item No:	17
Committee:	Full Council
Date:	23 October 2025
Title:	Memorial Policy – Exception to Pause October 2025
By:	Steve Quayle, Town Clerk
Purpose of Report:	To seek approval from Full Council for an exception to be made to the pause on the Memorial Policy

Actions

Full Council is advised:

1. To consider the proposal to make an exception to the Memorial Policy.
2. To move to a vote on the motion below.

Recommendations

Full Council is recommended:

1. To approve an exception to the pause on the Memorial Policy to allow a memorial bench in recognition of the late Jon Freeman's contribution to the town of Seaford.

1. Introduction

- 1.1** In 2023, Officers took a policy decision to place memorial requests temporarily on pause given the lack of available locations within the town, the lack of officer resources, and concerns around the increasing cost of maintenance and upkeep for memorial benches.
- 1.2** At Full Council in January 2025, this pause was formalised while officers investigated various options with a commitment to reinstate the Memorial Policy by 31 March 2026.

- 1.3 Alongside the formal pause, it was agreed that an exceptions process would be created allowing for exceptional one-off cases to be considered, in the event of at least seven elected Town Councillors writing to the Town Clerk expressing clear support for an exception to be made.
- 1.4 The Town Clerk can confirm that at least seven Town Councillors have written to him expressing clear support for an exception to the pause to be considered in the case of a memorial for Jon Freeman.

2. Background to the Exception

- 2.1 Councillor Adeniji has provided a rationale in support of the proposal, as follows:
- 2.2 *“Jon Freeman served as a Town Councillor from 1999 to 2011, Mayor of Seaford in 2003, and Leader of the Town Council from 2004 to 2011. The Town Council learnt with great regret of his passing.*
- 2.3 *Jon was part of the Town Council from its inception in 1999 and remained an active member for 12 years. During this time, he played an influential role in shaping the direction of the Council and the town.*
- 2.4 *As a councillor, Jon contributed to numerous projects and initiatives. As Mayor and later as Leader of the Council, he guided Seaford through both opportunities and challenges with a clear aim of improving the town and supporting its residents. He was deeply committed to ensuring that local voices were heard and that the Town Council acted in the best interests of the community.*
- 2.5 *Jon also held wider political and community roles, serving as a County Councillor for Seaford between 1993 and 2013, Chair of East Sussex County Council, District Councillor, Chair of Sussex Community Rail Partnership, Chair of Seaford Seniors Forum, Chair of Eastbourne and Sussex Fire Authority, and Chair of Seaford Community Partnership from 2004 to 2016.*
- 2.6 *He also supported education and young people as a school governor at Seaford Primary and Cradle Hill Schools and as a partner and volunteer at Mercread Youth Centre.*
- 2.7 *His voluntary and fundraising work included campaigns to save local services such as the Horder Day Centre, raising funds for the Seaford*

skate park, cycling from Land's End to John O'Groats for Sussex Samaritans, and supporting The View at Seaford Head Golf Club.

- 2.8** *Jon worked together with Cllr Adeniji in setting up the Campaign for Action on Seaford Health (CASH). He was instrumental in saving the Horder Day Centre from being sold to private developers, and he contributed immensely to the town over many years.*
- 2.9** *Other councillors have spoken warmly of Jon's support and leadership. Cllr Wallraven recalled awarding him a Mayor's Award in recognition of his work outside of the Council. Cllr R Honeyman praised his role as a prominent Chair of the Seaford to Brighton Line Community Rail Partnership, while Cllr O Honeyman described him as a great support to new councillors.*
- 2.10** *Jon's long record of service and his impact on the town make him a deserving candidate for an exception to the Memorial Policy."*

3. Proposal Details

- 3.1** Councillor Adeniji has provided the following narrative in relation to the proposal details:
- 3.2** *"The proposal is for a memorial bench.*
- 3.3** *Officers would work with the family to identify the most suitable type of plaque and assess the best location onsite.*
- 3.4** *The family has agreed to cover all the costs.*
- 3.5** *While benches do carry future maintenance requirements, in this case officers will monitor the situation closely.*
- 3.6** *Given the one-off nature of this exception and the family's willingness to work with the Town Council, it is not considered to set a precedent for further requests during the pause period."*

4. Financial Appraisal

- 4.1** There is the possibility of future maintenance costs to maintain the memorial bench. On its own, the addition of this bench should not have an impact on the Town Council's public liability insurance premiums.

5. Contact Officer

- 5.1** The Contact Officer for this report is Steve Quayle, Town Clerk.



Seaford Town Council

Report No:	98/25
Agenda Item No:	18
Committee:	Full Council
Date:	23 October 2025
Title:	Adoption of a Whistleblowing Policy
By:	Darryl Keech, Deputy Town Clerk & Responsible Financial Officer
Purpose of Report:	To present the recommendation from the Personnel Committee to adopt the Whistleblowing Policy

Actions
Full Council is advised:
1. To consider the Whistleblowing Policy. 2. To move to a vote on the motions below.

Recommendations
Full Council is recommended:
1. To note the contents of the report. 2. To adopt the Whistleblowing Policy, as recommended by the Personnel Committee.

1. Introduction

- 1.1 At its meeting in March 2025, Full Council deferred consideration of a draft Whistleblowing Policy back to the Personnel Committee.
- 1.2 As the first step of this review, the Personnel Committee met and considered the draft Whistleblowing Policy at its meeting on 9 October 2025.

- 1.3** This report is now presenting the proposed Whistleblowing Policy at **Appendix A** for consideration and adoption by Full Council, as recommended by the Personnel Committee.

2. Information

- 2.1** Report 85/25 to the Personnel Committee provided:
- (a)** An introduction to the Whistleblowing Policy,
 - (b)** Details of the review process and history of the consideration to date, and
 - (c)** An introduction to the revised policy format that officers are looking to introduce.
- 2.2** Should members wish to revisit the report presented to the Personnel Committee, this can be viewed on the [Town Council's website](#) (page 4 onwards).
- 2.3** The Committee discussed the proposed policy at great depth, covering: feedback on the proposed new policy branding, margins within the document, scene setting within the introduction, councillors coming within the scope of the policy and the processes to enable this, the legislation applicable to whistleblowers and the scope of this, continuity of terms used, adding contact email addresses to the policy, the differentiation between whistleblowing and a grievance, updates to the hierarchical table, the process for a Town Council decision to be called in by councillors and how a disclosure of a Town Council decision would differ, clarity around malicious disclosures, the examples of external agencies to make disclosures to, the inclusion of volunteers in the policy, and residents being able to use the complaints process for raising concerns.
- 2.4** The Committee recommended that Full Council adopt the Whistleblowing Policy, subject to changes discussed in the meeting. Officers have subsequently tracked the changes discussed by the Personnel Committee on 9 October on the attached version of the policy.
- 2.5** Full Council is asked to consider the proposed Whistleblowing Policy as recommended (and amended) by the Personnel Committee and adopt this.

3. New Policy Format

- 3.1** Since joining the Town Council, the Policy & Risk Officer and Deputy Town Clerk have been working on reviewing the Town Council's suite of policies,

scheduling review dates, identifying new policies that require introducing, mapping out the linkage between policies, and reviewing the standard policy format.

- 3.2** The schedule of proposed reviews, new policies to be introduced and details of policy linkage is due to be reported to the Finance & General Purposes Committee at its meeting on 18 December 2025.
- 3.3** The revised policy format has been created sooner however, to enable this to be rolled out as policies are reviewed or introduced.
- 3.4** The proposed Whistleblowing Policy has been presented in the revised policy format, enabling:
 - (a)** clear and consistent Town Council branding being applied to all policy documents,
 - (b)** easily identifiable policy status, version history and linkage with other policies,
 - (c)** a table of contents for ease of navigating the document,
 - (d)** consistency across policy documents in relation to the initial sections of each policy document: introduction, aim and scope, who the policy applies to, and key definitions.
- 3.5** Officers welcome councillor feedback on the revised policy format, ahead of this being rolled out across all policy documents.

4. Financial Appraisal

- 4.1** There are no direct financial implications as a result of this report.

5. Contact Officer

- 5.1** The Contact Officer for this report is Darryl Keech, Deputy Town Clerk & Responsible Financial Officer.



WHISTLEBLOWING POLICY

This policy sets out the procedure to ensure that the Town Council deals with whistleblowing concerns in a fair, transparent and consistent manner

"Working with our community to secure Seaford's best future"

Policy Status

Version	1.0	Last Review Date	October 2025
Adopted Date	October 2025	Next Review Date	October 2028
Review Period	Annually	Approving Body	Full Council

Version History

Date	Version	Approval	Status
{New policy}			

Related Policies and Other References

<u>Policy Reference Code</u>	<u>Policy Name</u>
PE5	Grievance Policy
PE3	Disciplinary Policy
CC2	Code of Conduct Policy

Table of Contents

Section	Title
1.0	Introduction
2.0	Aim and Scope
3.0	Policy Application <u>Who This Applies To</u>
4.0	Defining Whistleblowing
5.0	Whistleblowing Policy and Grievance Procedure
6.0	Legal Framework
7.0	Raising a Concern Internally <u>Making a Disclosure</u>
8.0	Confidentiality
9.0	Investigation of the Raised Concern <u>Disclosure</u>
10.0	Recording and Monitoring of Whistleblowing Complaints <u>Disclosures</u>

1. Introduction

- 1.1. Seaford Town Council is committed to conducting all its business in an honest, fair, transparent, and consistent manner. The Council expects all its officers, councillors, contractors and volunteers to maintain high standards, ensuring integrity across all areas of the Council, and to act at all times in accordance with the Council's Whistleblowing Policy.
- 1.2. However, in common with all organisations and other councils, the Council is obligated to manage the risk of any misconduct, including, but not limited to fraud, unethical conduct, wrongdoing, or financial misconduct.
- 1.3. Officers, councillors, contractors or volunteers would often be the first to realise if there was something seriously wrong within the Council. However, they may be reluctant to voice their concerns, as they could worry about being perceived as untrustworthy colleagues. Furthermore, they may fear harassment or victimisation after ~~reporting a~~ concerns disclosing concerns about wrongdoing within the Council. Under these circumstances, the risk of avoiding wrongdoing may arise, potentially leading to a delay in the necessary investigation for a suspected case of misconduct.
- 1.4. The Council is committed to the highest possible standards of openness, transparency, and accountability. In line with that commitment, we expect anyone who has serious concerns about any aspect of the Council's work to come forward and voice those concerns.
- 1.5. Therefore, to prevent misconduct and address it appropriately, the Council recognises that fostering a culture of openness and accountability is essential.
- 1.6. This policy document makes it clear that this can be done without any fear of victimisation, or discrimination. This Whistleblowing Policy is intended to ~~encourage and~~ enable anyone to raise serious concerns within the Council.
- 1.7. Hence, this policy is key to ensuring that any ~~concerns raised~~ disclosure made about wrongdoing ~~are~~ is addressed promptly and properly, and in a manner that fosters transparency and confidence in the Council's functioning.

2. Aim and Scope

- 2.1. The Whistleblowing Policy is primarily for ~~concerns~~ disclosures where the interests of the organisation or general public are at risk. This policy should be used if an incident arises that raises an ethical concern within the Council.
- 2.2. Therefore, the aim of the policy is to enable officers, councillors, contractors, and volunteers (hereafter 'Whistleblowers') to report unethical

misconduct that relates to an inappropriate or inadequate procedure, practice, or functioning within the Council.

2.3. This policy aims to:

- ~~Encourage~~Ensure Whistleblowers ~~to~~ feel confident in ~~raising serious concerns~~making a disclosure, questioning, and acting upon concerns about misconduct
- Provide avenues and flexibility for Whistleblowers to ~~raise concerns~~make a disclosure and receive feedback on any actions taken.
- Ensure that all Whistleblowers receive a response to their ~~concerns~~disclosure, where appropriate, and acknowledge that they have the right to ask for further information if the action taken is not satisfactory.
- Protect the confidentiality of a Whistleblower by ensuring they are protected from possible reprisals or victimisation if they have a reasonable belief that they have made a disclosure in good faith.

2.4. However, this policy shall not be used to deal with complaints or grievances which Whistleblowers may have about their employment and/or contractual terms.

3. Policy Application

3. Who This Applies To

- 3.1. This policy applies to all Council ~~employees~~officers, regardless of whether they are full-time, part-time, temporary, or permanent officers. The policy also applies to ~~all volunteers and~~ contractors, including their staff working for the Council (e.g., agencies, consultants, and providers of services and supplies).
- 3.2. Additionally, this policy applies to all councillors and volunteers, who have a level of exposure to and involvement in Town Council activities and processes and it is therefore felt only reasonable that they also have a prescribed route for making disclosures. A- albeit it is recognised by the Town Council that the strict definition of the term 'workers' in the legislation means they councillors and volunteers are not afforded the same level of legal protection.

4. Defining Whistleblowing

- 4.1. Whistleblowing is the term used when a worker passes on information concerning wrongdoing. In this Policy, the Council calls that making a “disclosure” or raising a “concern.” The wrongdoing will typically (although not necessarily) be something Whistleblowers have witnessed or become aware of at work.

- 4.2. Furthermore, it refers to a disclosure made in good faith and in the public interest by one or more Whistleblowers regarding wrongdoing, illegal acts or omissions witnessed.
- 4.3. The Council acknowledges a Whistleblower is a witness rather than a complainant.
- 4.4. Whistleblowing is not the same as making a complaint or raising a concern about poor treatment that that has been personally experienced. A Whistleblower is usually not directly or personally affected by the concern disclosed, although they may be indirectly.
- 4.5. This policy applies to ~~concerns~~disclosures regarding any aspect of service provision or the conduct of anyone acting on behalf of the Council.
- 4.6. The above-mentioned ~~concerns~~disclosures include but are not limited to the following:
 - A criminal offence has been committed, is being committed, or is likely to be committed.
 - Failure to comply with any legal or regulatory requirements or professional obligations.
 - Danger to the Council's standard operation (e.g., delays in projects or service provision)
 - Financial fraud or mismanagement of the Council
 - Breach of the Council's internal policies and procedures (e.g., disciplinary, health and safety policy).
 - Any types of conduct likely to harm the Council's reputation and trust and/or financial credibility.
 - Unauthorised disclosure of confidential information that may result in a breach of the Council's classified information and/or data protection.
 - Any deliberate damage to the environment (e.g., illegal dumping or dumping toxic waste that leads to water contamination).
 - Deliberate concealment of information tends to show any of the matters mentioned above.

5. Whistleblowing Policy and Grievance Procedure

- 5.1. The Council takes into consideration the distinction between whistleblowing and grievance while conducting its investigation into any incident of disclosing a concern, to proceed with the most proper procedure and suitable steps to investigate.
- 5.2. The Council's Whistleblowing Policy is designed primarily for ~~concerns~~disclosures where the interests of the Council are at risk.
- 5.3. The Whistleblowing Policy refers to a risk, unethical behaviour, or illegal activity that impacts others. It may involve situations that harm officers, volunteers, contractors, councillors, the Council as a whole, or the public. On the other hand, a grievance policy refers to an individual's complaint

regarding their employment situation, such as workplace relationships or the application and interpretation of employment terms and conditions.

- 5.4. If a Whistleblower is uncertain about which policy applies to the intended ~~concern~~disclosure, any uncertainty must be raised with the Council's HR & OD Manager for further clarification and consideration. Email address: HR@seafordtowncouncil.gov.uk

6. Legal Framework

- 6.1. The Council is committed to the Public Interest Disclosure Act (PIDA) 1998 ("The Act") and the Equality Act 2010, amended to provide protection for Whistleblowers to raise legitimate concerns regarding any misconduct within the Council, and to provide a guarantee against victimisation of Whistleblowers.
- 6.2. The Council acknowledges that a Whistleblower is not responsible for investigating the matter in any way. It is the Council's duty to investigate the ~~concerns raised~~disclosure.
- 6.3. A Whistleblower will not be protected under the Act if the law is broken when making a disclosure.

7. Raising A ~~Concern~~Disclosure

- 7.1. The Council acknowledges that the Whistleblower ~~raising~~making a ~~concern~~disclosure does not have to have firm evidence before doing so. Instead, the existence of a reasonable belief that wrongdoing is taking place is sufficient. Any evidence provided to the Council will be useful and would be considered in helping the Council investigate any ~~concern~~reporteddisclosure, although it could be that the Whistleblower is not able to provide any evidence. Therefore, the Council reserves the right to request further information and explanation regarding the circumstances that gave rise to the ~~concern~~disclosure as fully as possible.
- 7.2. An officer is typically expected to raise any ~~concern~~disclosure(s) either verbally or in writing to the attention of the associated line manager. Contractors or volunteers should ~~raise~~make a ~~concern~~disclosure in the first instance with their contact within the Council, usually the manager directly in charge. Afterwards, the manager will notify the designated Council's HR & OD Manager within three working days, whenever possible, to take the necessary action.
- 7.3. Any councillor/s wishing to ~~raise~~make a ~~concern~~disclosure about an officer, contractor or volunteer may do so by contacting the Town Clerk or Chair of Personnel Committee.
- 7.3-7.4. Any councillor/s wishing to make a disclosure about another councillor may do so by contacting the District Council's Monitoring Officer.

7.5. Please refer to 9.7 for the details of the hierarchical table for the whistleblowing process

7.4.7.6. The line manager responsible and the designated HR & OD Manager must take all concernsdisclosures seriously.

7.5.7.7. The Council will aim to respond to written concernsdisclosures and acknowledge them within five working days of receipt. Furthermore, the Council will address the matter as soon as possible, keeping the Whistleblower informed of the progress throughout, as required. However, where a detailed investigation is considered necessary then the Council may need an extended period to investigate the concernsdisclosure. Where this is the case, it will be communicated.

7.6.7.8. The Council encourages putting names to the allegations to investigate and assess the situation as thoroughly as possible, because anonymous concernsdisclosures are more difficult to investigate and impossible to provide feedback on.

7.7.7.9. Whilst the Council would strongly prefer any disclosure to be made directly to the Council, it is acknowledged that PIDA makes allowances for a concerndisclosure to alternatively be made to a prescribed body ~~(like the Information Commissioner's Office) or to a solicitor.~~ examples of relevant bodies/organisations below:

Information Commissioner's Office <https://ico.org.uk/>

The Citizens Advice Bureau <https://www.citizensadvice.org.uk/>

Protect (Independent whistleblowing charity) <https://protect-advice.org.uk>

Advisory, Conciliation and Arbitration Service (ACAS)

<https://www.acas.org.uk/advice>

7.8.7.10. If the matter has been signposted by the Council to be addressed via an alternative mechanism, for example an external body (for example External Auditors/HMRC) then the Whistleblower will be informed of this, and progress will be shared with them in line with the rules of the external body, and not under the Council's Whistleblowing Policy.

8. Confidentiality

8.1. Any concernsdisclosures investigated under the Council's Whistleblowing Policy will be examined comprehensively, swiftly, and with discretion.

8.2. The Council confirms that the ~~disclosed concern~~disclosure will be addressed in accordance with the provisions outlined in the Act to avoid any harassment, victimisation or bullying of the Whistleblower.

8.3. No Whistleblower will be subject to changes to, or any detriment to their employment status, benefits, or work-related training due to raisingmaking a legitimate concerndisclosure. Furthermore, any alleged victimisation of the Whistleblower will be investigated as a potential disciplinary offence in line with the Council's disciplinary policy.

- 8.4. However, the Whistleblower will not be protected from the consequences of making a disclosure if, by doing so, they commit a criminal offence.

9. Investigation of the ~~Raised Concern~~Disclosure

- 9.1. The ~~concern~~disclosure will be investigated, and as part of Council's investigation process, the Whistleblower will be interviewed and requested to submit a written statement detailing the nature and specifics of their report along with the rationale behind it.
- 9.2. This investigation may involve a formal review of internal processes or a more formal investigation.
- 9.3. The HR & OD Manager will contact the Whistleblower and remain the point of contact throughout the process. In their absence, the Deputy Town Clerk will manage the initial investigation.
- 9.4. The Whistleblower will not be penalised for ~~raising~~making a disclosure even if it is not upheld, unless the complaint was known to be untrue and/or made with malicious intent. Any intentionally malicious disclosures will be subject to a full investigation in line with the Council's Disciplinary Policy and may result in disciplinary action being taken.
- 9.5. The Council may, in certain circumstances, need to appoint an external investigator with relevant knowledge and understanding to complete the investigation process. The investigator (or investigators) may make recommendations for changes to minimise the risk of future wrongdoing. Therefore, the appointed investigators will undergo a thorough investigation, with possible outcomes being one or more of the following:
- Referral to the police,
 - Referral to an external auditor,
 - Referral to a disciplinary process, or,
 - No action to be taken depending on the outcome of the full investigation.
- 9.6. The Council may not be able to disclose specific actions taken during the investigation to ensure that it does not violate its obligations to maintain confidentiality regarding other individuals during the implementation of any internal procedure.

9.7. Below is the hierarchical table for the whistleblowing process.

<u>Concerns</u> <u>Disclosures</u> Relating To:	Stage 1 – Send To:	Stage 1 - Investigating Officer Options:	Stage 2 – Escalate To:
Town Clerk	Your line manager OR	Deputy Town Clerk (supported by Chair of	Chair of CCMG & Chair of Personnel

<u>Concerns Disclosures</u> Relating To:	Stage 1 – Send To:	Stage 1 - Investigating Officer Options:	Stage 2 – Escalate To:
	HR & OD Manager	Disciplinary & Grievance Panel)	
Deputy Town Clerk	Your line manager OR HR & OD Manager	Town Clerk	Chair of CCMG & Chair of Personnel
Head of Place	Your line manager OR HR & OD Manager	Town Clerk	Chair of CCMG & Chair of Personnel
All others <u>other staff/officers</u>	Your line manager OR HR & OD Manager	HR & OD Manager	Town Clerk
<u>A Councillor/s by an officer, contractor or volunteer</u>	Town Clerk OR Chair of CCMG & Chair of Personnel	External – District Council's Monitoring Officer	n/a
<u>A Councillor/s by another Councillor</u>	<u>External – District Council's Monitoring Officer</u>	<u>n/a</u>	<u>n/a</u>
A Council decision	Your line manager OR HR & OD Manager	Town Clerk OR Deputy Town Clerk OR Head of Place	External – District Council's Monitoring Officer

10. Recording and Monitoring of Whistleblowing Complaints

- 10.1. All incoming ~~concerns~~disclosures will be registered, documented, and stored in accordance with the Council's policies.

- 10.2. The HR & OD Manager will maintain a safe record of ~~concerns~~ raised disclosures made and the outcome of the investigation.
- 10.3. If ever unsure about the contents or any part of this policy, then the Whistleblower should speak to their line manager or the HR & OD Manager.

DRAFT



Seaford Town Council

Report No:	90/25
Agenda Item No:	19
Committee:	Full Council
Date:	23 October 2025
Title:	Review of the Bad Debt Policy
By:	Darryl Keech, Deputy Town Clerk & Responsible Financial Officer
Purpose of Report:	To present the recommendation from the Finance & General Purposes Committee to adopt the revised Bad Debt Policy

Actions

Full Council is advised:

1. To consider the revised Bad Debt Policy.
2. To move to a vote on the motions below.

Recommendations

Full Council is recommended:

1. To note the contents of the report.
2. To adopt the revised Bad Debt Policy, as recommended by the Finance & General Purposes Committee.

1. Introduction

- 1.1** The Town Council's Bad Debt Policy sets clear expectations for how the Town Council will handle its debtors and the processes to be followed.
- 1.2** The Policy was last adopted in October 2022 and was updated in March 2025 following amendments to the Financial Regulations.

- 1.3 As the first step of this review, the Finance & General Purposes (F&GP) Committee met and considered the revised Bad Debt Policy at its meeting on 25 September 2025.
- 1.4 This report is now presenting the proposed Bad Debt Policy at **Appendix A** for consideration and adoption by Full Council, as recommended by the F&GP Committee.
- 1.5 This policy is presented in the former policy format due to the initial review by F&GP having pre-dated the introduction of the revised policy format. Upon adoption, this policy will be transferred to the new format.
- 1.6 Due to the scale of revisions and the introduction of several new sections, it was considered undesirable to present the proposed document with tracked changes. Instead, a clean revised version has been produced for adoption.

2. Information

- 2.1 Report 78/25 to the F&GP Committee provided:
 - (a) An introduction to the Bad Debts policy
 - (b) Details of the review process, and
 - (c) An overview of the changes being recommended by officers
- 2.2 Should members wish to revisit the report presented to the F&GP Committee, this can be viewed on the [Town Council's website](#) (page 31 onwards). This link contains a copy of the previous policy for comparison against the proposed policy, if desired
- 2.3 The Committee were in support of the revised policy document, in particular with the policy now stipulating use of the Small Claims Court to pursue debtors and more clarity around the golf membership direct debit terms and process.
- 2.4 There have been no further changes to this policy since it was considered by the F&GP Committee.
- 2.5 Full Council is asked to consider the proposed Bad Debt Policy as recommended by the F&GP Committee and adopt this.

3. Financial Appraisal

- 3.1 There are no direct financial implications as a result of this report.

- 3.2** Adoption of the revised policy will support the Town Council in protecting its income streams, minimising financial risk, and ensuring fair but firm debt recovery practices.
- 3.3** Legal costs may be incurred in pursuing debts through the Small Claims Court; however, these costs can be added to the debt owed.
- 3.4** The golf direct debit provisions already apply in practice; including them in the policy ensures greater clarity for members and strengthens the Town Council's position in recovering arrears.

4. Contact Officer

- 4.1** The Contact Officer for this report is Darryl Keech, Deputy Town Clerk & Responsible Financial Officer.

N.B. This policy is presented in the former format due to the initial review by F&GP having pre-dated the introduction of the revised policy format. Upon adoption, this policy will be transferred to the new format



Seaford Town Council

Bad Debt Policy

Policy Ref.	F10
Date Last Adopted	October 2022 NB. Revised in March 2025 following the Financial Regulations Update
Current Review	September 2025
Possible Prompts for Earlier Review	• Use of the policy and areas for improvement identified • Change in legislation and/or codes of practice
Previous Adoption Dates	October 2022 June 2016 June 2015
Author	Finance Manager

Bad Debt Policy

1. Introduction

- 1.1 Seaford Town Council has a duty to all residents to ensure the prompt and cost effective invoicing, collection and recovery of all sums due to the Town Council.
- 1.2 This policy outlines Seaford Town Council's procedures for dealing with late payments and outstanding accounts (bad debts) in accordance with Financial Regulations.

2. Policy Objectives

- 2.1 The objective of this policy is to maximise the income of the Town Council by collecting all debts owing to it promptly, effectively, efficiently and economically, whilst ensuring unbiased and fair treatment to all debtors.

3. Framework and Purpose

- 3.1 This policy document sets out the procedures for enabling the prompt collection of all sums of money due, and for ensuring that a fair and consistent approach is taken to recover sums that are not paid on a timely basis.
- 3.2 This policy relates to the collection of all forms of revenue including:
 - Land / rents / leases / licences
 - Invoices raised
 - Sundry debts
 - Land rents and pitch hire
 - Golf Membership fees
- 3.3 Effective debt collection ensures that any adverse impact on cash flow is minimised and that the Town Council maintains a reputation of requiring full and prompt payment from its debtors.
- 3.4 In the event that a debt ultimately becomes uncollectable due to bankruptcy, insolvency, death, or the inability to trace the debtor or where the debt is uneconomic to pursue, such debts will be considered for write off in accordance with section 10 of this Policy.

4. Roles and Responsibilities

- 4.1 The Responsible Financial Officer (RFO), Finance Manager and Finance Officer will follow best practice and the most up to date legislation to ensure that the Town Council maximises the collection of debts and income in the most efficient and cost effective manner.
- 4.2 This policy provides clear guidance on the:

- Organisation and supervision of all income arrangements, including the recording, reporting, recovery and monitoring of income;
- Framework and timeframe for debt collection, enabling the Town Council to maximise the collection of debts and income in a fair, efficient and cost effective manner;
- Proper accounting of income within the Town Council's finance system, and on setting an appropriate annual provision for bad debts.

5. Raising Invoices

- 5.1 Invoices will be raised in advance of the provision of service or goods wherever appropriate to do so, to minimise the financial risk to the Town Council. This will particularly apply to all rents and hire charges.
- 5.2 Invoices will be supported by documentation where necessary detailing the service or goods provided, and any applicable hire charges, rents or fees evidenced, with VAT charged where applicable.
- 5.3 Invoices will be raised promptly and contain sufficient detail of the service or goods provided, the date/s to which the invoice relates and the due date for which payment should be received. This will be between 0 and 30 days from the date of the invoice dependent on the type of supply.
- 5.4 Where services or goods are provided over a period, invoices will be raised periodically under the terms of the agreed provision.

6. Payment Terms

- 6.1 The Town Council's preferred method of payment is BACS transfer. Payments may also be made by cash or cheque. For golf fee income only, payments can be made by credit/debit card or by direct debit (subject to an administration fee).

Note - the Town Council's administrative office does not currently accept debit or credit card payments; these are processed solely in relation to golf services from the Pro Shop.

- 6.2 Upon request from a debtor to vary the payment terms applicable to the debt, (such as where a debtor is not able to repay the debt completely, either immediately or within a reasonable timescale), each case will be considered individually by the RFO / Finance Manager with a view to establishing a repayment arrangement over a specific period of time. The repayment arrangement will be detailed in writing and agreed with the debtor.
- 6.3 Where a payment arrangement is made, failure to maintain regular payments as detailed in the repayment arrangement will result in further recovery action and reasonable costs may be added to the

debt. Recovery action may include any type of debt recovery process, up to and including bankruptcy proceedings if appropriate, as agreed by the RFO in conjunction with the Town Clerk.

- 6.4 Where golf membership direct debit payments fail, the Town Council's approach is set out in Section 8.7 of this policy.

7. Responsibilities of Debtors

- 7.1 Any person, organisation or company that owes money to the Town Council, or has a liability to pay, should comply with all legal obligations in respect of the liability by:

- Ensuring that payments reach the Town Council by the due date.
- Following instructions provided to ensure payments are able to be credited correctly against the amount due.
- Informing the Town Council of any changes in circumstances that may have an impact upon the amount to be paid, or the ability to pay.
- Notifying the Town Council of any change of address.
- Contacting the Town Council promptly if it is believed the amount due is incorrect.

8. Credit Control

- 8.1 All income due will be collected in accordance with Financial Regulations and any sums found to be irrecoverable or any subsequent bad debts shall be reported to the Finance & General Purposes Committee and where necessary, Full Council.

- 8.2 Unpaid income and bad debts shall be treated in the following manner:

- **Once the due date has passed** – a first reminder is sent requesting payment as soon as possible.
- **30 days overdue** – a second reminder is sent requesting payment within 14 days.
- **45 days overdue** – a third reminder letter issued, confirming that the Town Council's financial information, including bad debts, is reported to the Finance & General Purposes Committee.
- **60 days overdue** – the debtor is contacted directly to establish the reasons for non-payment and to agree a deadline.
- **90 days overdue** – final letter issued, notifying the debtor of the withdrawal of the service provided and confirming that Seaford Town Council will actively pursue all outstanding debts through the legal system, including the Small Claims Court or bankruptcy proceedings, where appropriate.

- 8.3 In exceptional circumstances, the RFO / Finance Manager may agree a structured repayment arrangement to assist recovery of the debt

before formal legal action is taken. The repayment arrangement will be detailed in writing and agreed with the debtor.

- 8.4 In the case of debts resulting in an application to the Small Claims Court or other legal process, the debtor will be liable for any fees incurred by the Town Council in recovering the debt.
- 8.5 In the case of leased property debts, such proceedings may result in forfeiture of the property and Court Action being taken to enforce the Council's rights as Landlord to recover amounts due on the property.
- 8.6 In terms of hire, no further hire agreements will be permitted until such time as the debt has been cleared. The Town Council reserves the right to refuse permission for future hire agreements where credit control has been an issue.
- 8.7 Golf Membership Direct Debit Payments are treated as follows:
 - 8.7.1 Where a golf membership direct debit payment fails, the Town Council reserves the right to apply a discretionary administration fee of £25 to cover additional processing and recovery cost.
 - 8.7.2 This fee will not normally be applied where the failure is due to an administrative error (e.g. incorrect bank details) and the debtor makes immediate payment in full by BACS transfer.
 - 8.7.3 Where payment is not received promptly, or where the failure is due to insufficient funds in the debtor's account, the administration fee will apply, and the Town Council may require that the balance of the annual membership fee be paid in full immediately. The debtor's right to play golf will be suspended immediately until all outstanding fees and charges (including any administration fee) have been settled.
 - 8.7.4 Any outstanding amount of the annual membership fee remaining unpaid, as well as any costs due will continue to be a debt to the Town Council. The Town Council will actively pursue the outstanding debt through the legal system, including the Small Claims Court or other legal process where appropriate.

9. Repayment of Arrears

- 9.1 Where a repayment arrangement has been agreed, the Town Council will seek repayment of all outstanding arrears as soon as possible, and by the end of the financial year wherever possible.
- 9.2 Repayment arrangements will only be considered where such an arrangement is more likely to result in the Town Council recovering the payment in full.
- 9.3 Repayment arrangements may not be agreed where the debtor appears to have sufficient funds/assets to pay the debt immediately.

10. Write off Bad Debts

- 10.1 The Town Council will seek to minimise the cost of write offs by taking all necessary action to recover what is due. Debts will be subject to the full recovery, collection and all reasonable legal procedures, including use of the Small Claims Court or bankruptcy proceedings where appropriate.
- 10.2 The Town Council recognises that where a debt is irrecoverable, prompt and regular write off of such debts is good practice. Whilst writing off bad debts is a non-routine function; all practical means should be taken to recover outstanding amounts due to the Town Council before the RFO / Finance Manager makes a recommendation to the Finance & General Purposes Committee. Before this decision is made, due diligence consideration should include the following:
- The cost of recovery against the amount owed.
 - The likelihood of success.
 - Were the correct credit control procedures followed.
 - Could procedure and practices be improved.
- 10.3 In accordance with section 13.3 of the Financial Regulations, any debts being considered for write off should be reported in the form of a write off schedule to the Finance & General Purposes Committee, who have delegated powers to write off bad debts of up to £5,000. Larger debts must be written off by Full Council. The write off schedule should contain the following information:
- Customer Reference.
 - Invoice number.
 - Date of invoice.
 - Amount of debt.
 - Reason for write off.
 - Recovery history.
 - Date of write off.
 - Authorisation of write off.

11. Year-end Write Offs

The RFO / Finance Manager should ensure any bad debts and debts unlikely to be repaid are correctly accounted for at year end.